



# Variation No.6

Who are you:	Agent
Name:	Michael Browne On behalf of BBA Architecture
Reference:	VAR6-143851
Submission Made	January 16, 2026 2:50 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Chapter 1 – Proposed Variation No. 6
- Chapter 3 – Proposed Variation No. 6
- Chapter 6 – Proposed Variation No. 6

## Write your observations here:

We write to make a submission to the proposed variation No.6 of the Wicklow County Development Plan 2022-2028.

We welcome the proposed variation at a time of a housing crisis in Ireland.

We note the content of the Minister's letter to the Local Authority on 11th December 2025. In particular, the items noted for identifying suitable lands.

We further note the comments on the Greystones/Delgany/Kilcoole, Draft LPF by the Office of the Planning Regulator (OPR).

We would comment as follows

- The 2016 CPD projected a population of 185000 and 85000 units in the county. This was reduced by de-zoning in the 2022 CPD plan. We would suggest that the figure for 2031 should be in excess of 200,000 population and in the area of 95,000 units.

- We would further suggest that all villages and smaller towns contribute to

population growth in the county to assist the sustainability of schools and sporting clubs, etc.

- We therefore suggest that all lands de-zoned in the 2022 CPD and currently being de-zoned in the Draft LPF for Arklow and Greystones be restored and that further lands be zoned for residential use as suggested by the Minister.
- We would suggest that these are significant lands in Newtownmountkennedy and Greystones that are serviceable and capable of absorbing growth.
- In this regard we note that Newtownmountkennedy is adjacent to the M11 and that Greystones/Delgany is serviced by the DART and has capacity in its Waste Water Treatment Plant.
- We would suggest that the 50% headroom suggested by the Minister be applied to population figures.
- We further suggest that a growth of 30% is too low in Greystones, a town that is serviced, on the DART and has new primary and secondary schools.
- In this regard there are also ample suitable lands for zoning to the South, North and West of the current (reduced) settlement area boundaries in Greystones and Delgany.
- In particular, we suggest that the CORE STRATEGY OBJECTIVE 1 in chapter 3 be amended to read as follows;
- All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1/ Priority 1 and Phase 2 / Priority 2 lands will be considered positively and equally for permission during the lifetime of this plan subject to the sustainable development objectives set out in this plan.

In order that phasing and sequencing shall not be a constraint on Development as directed by the Minister's letter of 11th December 2025, to the Chief Executive of Wicklow County Council.

This is in order to avoid a potential Developer committing substantial funds to a planning application and subsequently receiving a planning refusal on a sequential or a phasing basis.

- We suggest that minimum densities of 50dph may be inappropriate and unviable in certain areas of metropolitan towns and that flexibility may be required in this regard.

#### **Upload a File (optional)**

Proposed Variation No.6.pdf, 0.11MB

16<sup>th</sup> January 2026

**RE: PROPOSED VARIATION NO.6**

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To whom it may concern,

With regards to the above please see enclosed. Should you have any queries please do not hesitate to contact me at the following

Michael Browne  
Suite 3  
The Eden Gate Centre  
Delgany  
Co. Wicklow  
[Michael.Browne@bba.ie](mailto:Michael.Browne@bba.ie)

Yours Faithfully



Michael Browne

Encls.



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**Contact**

Michael Browne	Chartered Engineer, M.I.E.I M.I. Struct E. Dip. Const. Law, Dip. EIA Mgmt.
Luis Reis	B Arch. MRIAI
John Healy	Dip Arch. Tech.

## PROPOSED VARIATION NO. 6

We write to make a submission to the proposed variation No.6 of the Wicklow County Development Plan 2022-2028.

We welcome the proposed variation at a time of a housing crisis in Ireland.

We note the content of the Minister's letter to the Local Authority on 11<sup>th</sup> December 2025. In particular, the items noted for identifying suitable lands.

We further note the comments on the Greystones/Delgany/Kilcoole, Draft LPF by the Office of the Planning Regulator (OPR).

We would comment as follows

- The 2016 CPD projected a population of 185000 and 85000 units in the county. This was reduced by de-zoning in the 2022 CPD plan. We would suggest that the figure for 2031 should be in excess of 200,000 population and in the area of 95,000 units.
- We would further suggest that all villages and smaller towns contribute to population growth in the county to assist the sustainability of schools and sporting clubs, etc.
- We therefore suggest that all lands de-zoned in the 2022 CPD and currently being de-zoned in the Draft LPF for Arklow and Greystones be restored and that further lands be zoned for residential use as suggested by the Minister.
- We would suggest that these are significant lands in Newtownmountkennedy and Greystones that are serviceable and capable of absorbing growth.
- In this regard we note that Newtownmountkennedy is adjacent to the M11 and that Greystones/Delgany is serviced by the DART and has capacity in its Waste Water Treatment Plant.
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- We further suggest that a growth of 30% is too low in Greystones, a town that is serviced, on the DART and has new primary and secondary schools.

# bba

- In this regard there are also ample suitable lands for zoning to the South, North and West of the current (reduced) settlement area boundaries in Greystones and Delgany.
- In **particular**, we suggest that the **CORE STRATEGY OBJECTIVE 1** in chapter 3 be amended to read as follows:
  - All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively **and equally** for permission during the lifetime of this plan ~~subject to the sustainable development objectives set out in this plan.~~

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