



Variation No.6

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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
- SEA Screening & Determination – Proposed Variation No. 6
- AA Screening & Determination – Proposed Variation No. 6

Write your observations here:

I am making this submission because Proposed Variation No. 6 imposes an additional 1,200+ housing units on Bray, bringing the target to 6,299, without any full environmental assessment, without a completed Local Planning Framework, without demonstrating infrastructure capacity, and without meaningful public consultation. I only discovered this consultation by chance on Facebook. This is top-down, target-driven planning that sets numbers first and expects communities, infrastructure, and the environment to absorb the consequences afterwards. It is not sustainable, it is not transparent, and it should not be adopted without serious reconsideration. Please see attached observation and submission. Thank you

Upload a File (optional)

Submission on Proposed Variation No 6 - Alison Wildes.docx, 0.02MB

Submission on Proposed Variation No. 6 Wicklow County Development Plan 2022–2028

As a resident of Bray, I am making this submission to express serious concern about Proposed Variation No. 6 and its impact on our community.

Inadequate Public Notification and Consultation

I wish to raise concern about the adequacy of public notification and consultation for this Proposed Variation. Many residents, including myself, only became aware of this consultation at an extremely late stage. Given the significance of the changes proposed, including a substantial increase in housing targets for Bray, the level of public awareness and engagement appears to have been minimal. I found this by chance posted by a local councillor, on Facebook.

Effective public participation in environmental and planning decisions is a requirement under the Aarhus Convention, to which Ireland is a signatory. This includes the right to access information in a timely manner and to participate meaningfully in decision-making processes that affect the environment. I am concerned that the notification and publication process for Proposed Variation No. 6 may not have fulfilled these obligations, and I ask that this be reviewed.

Concerns Regarding Strategic Environmental Assessment and Appropriate Assessment

I note that both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) were screened out for Proposed Variation No. 6, meaning that no full environmental assessment was undertaken at this stage. This is remarkable given that SEA is specifically designed to apply to plans and programmes, or to anything that functions as a plan, regardless of what it is called. Proposed Variation No. 6 materially increases housing targets across the county, including a significant uplift for Bray. It strengthens delivery-focused policy language and alters the strategic context within which future planning decisions will be made. In substance, this functions as a plan with real environmental consequences.

The decision to screen out SEA and AA raises serious questions:

- How can a variation of this scale and consequence fall outside the scope of strategic environmental assessment?
- What safeguards exist to ensure that environmental considerations are not simply bypassed through procedural categorisation?
- Is the intention to defer environmental resolution to later stages, or to avoid it entirely?

I am concerned that the screening-out of SEA and AA is not merely a deferral of environmental safeguards but may in practice serve to circumvent them altogether. This undermines the purpose of strategic assessment, which is to examine cumulative and in-combination effects at the stage where meaningful choices can still be made.

Scale of the Proposed Changes for Bray

Based on the Proposed Variation documentation and clarification provided by a local councillor:

- Under the current County Development Plan, Bray was targeted to grow by 5,062 housing units between 2016 and 2031, representing approximately 45% growth from the 2016 baseline.
- Under Proposed Variation No. 6, Bray's housing target is increased to 6,299 units for the period 2022 to 2031, representing approximately 50% growth from the 2022 baseline.
- Allowing for housing already constructed since 2022, this equates to approximately 5,526 additional units still to be delivered between 2026 and 2031.

Bray is already designated as a Level 1 settlement (Key Town), the highest level in the county's settlement hierarchy. The Proposed Variation therefore increases housing numbers on top of an already

maximal strategic designation. These figures are drawn from Tables 3.3 and 3.5 of the Proposed Variation to Chapter 3 (Core Strategy) of the Wicklow County Development Plan.

Sequencing and Governance Concerns

These higher housing targets are being set before the Bray Local Planning Framework is completed. The Bray LPF, which will determine where development should go, what infrastructure is required, and how environmental impacts will be managed, is still in preparation. This means housing quantum is being fixed at Core Strategy level, while place-based resolution is deferred to later stages. This tightens the policy context for future decisions and reduces flexibility at local level.

By strengthening delivery-support language, the Proposed Variation increases the weight of housing targets in the planning balance. **There is a real risk that these targets become determinative rather than contextual in future planning decisions.**

Setting a Precedent for Future Developments

Recent planning experience in Bray demonstrates how Core Strategy housing targets and compact growth objectives are frequently relied upon in development management to justify increased scale and density, even where local constraints remain unresolved. In practice, this increases the likelihood that developments similar in nature and scale to recent proposals, such as The Maltings (a highly contentious development that was widely objected to by local residents), will be afforded greater weight on the basis of strategic housing targets, even where local constraints and cumulative impacts remain contested or unresolved.

The Proposed Variation risks reinforcing this dynamic by increasing Bray's housing target while deferring place-based resolution to later stages.

Bray's Physical and Infrastructural Constraints

Bray is already a physically and infrastructurally constrained settlement, shaped by:

- coastal and fluvial systems (including the Dargle River),
- steep topography,
- limited transport corridors, and
- cumulative demands on established services.

Areas such as Shankill Castle estate are already experiencing infrastructure constraints, including electricity and sewerage capacity issues (based on local knowledge, not official sources), yet housing targets are being increased before these existing deficits are addressed. While the Development Plan refers to infrastructure-led growth and flood risk avoidance, the Proposed Variation does not demonstrate how the revised housing target for Bray can be accommodated within existing or planned capacity over the relevant timeframe.

Cumulative Environmental, Biodiversity, Pollution, and Infrastructure Effects

While Proposed Variation No. 6 is framed as strategic and non-spatial, the scale of the revised housing targets for Bray has clear knock-on cumulative effects that warrant explicit consideration at Core Strategy stage. Increasing housing numbers without parallel strategic assessment risks compounding pressures across multiple interconnected systems.

Environmental and biodiversity impacts may include but not limited to:

- increased pressure on coastal, estuarine, and riverine environments,
- incremental habitat disturbance and fragmentation,
- indirect impacts on protected species, and
- reduced ecological resilience under intensified development pressure.

Pollution and environmental quality concerns include but not limited to:

- additional wastewater and surface water loading,
- diffuse pollution from construction and urban activity, and
- cumulative air quality and noise impacts linked to increased traffic and servicing demands.

Infrastructure and services pressures include but not limited to:

- strain on wastewater and drainage systems,
- transport congestion,
- pressure on social and community infrastructure, and
- increased exposure to flood risk and climate-related impacts where development intensifies within constrained catchments.

These effects may not arise from any single development in isolation, but from the aggregation of multiple developments over time, driven by the strategic housing targets now being set. Deferring consideration of these cumulative impacts to later plan-making or development management stages reduces the opportunity to shape growth in a coordinated, preventative, and genuinely sustainable manner.

What Sustainable Planning Requires

Sustainable development means more than meeting housing targets. It means:

- Stewardship: protecting the environment for future generations, not treating it as a constraint to be managed around.
- Lived reality: planning based on what residents actually experience, not modelled projections.
- Infrastructure-led growth: development should follow demonstrated capacity, not the reverse.

Setting higher targets first and dealing with impacts later risks undermining that objective. When housing numbers are fixed in advance of place-based planning, and when environmental and infrastructural resolution is deferred to later stages, or bypassed entirely through procedural screening, the result may be development, but it is not sustainable development in any meaningful sense.

Conclusion

For these reasons, I ask that:

1. The adequacy of public notification and consultation for Proposed Variation No. 6 be reviewed, having regard to Ireland's obligations under the Aarhus Convention. Residents have a right to be informed about decisions that will directly affect their communities, and that right has not been upheld in this case.
2. The decision to screen out Strategic Environmental Assessment and Appropriate Assessment be reconsidered, given the scale and substance of the proposed changes. A variation that increases housing targets by over 1,200 units for Bray alone, and strengthens delivery language across the county, cannot reasonably be said to have no significant environmental effects.
3. The implications of Proposed Variation No. 6 for Bray be holistically and realistically reconsidered, taking into account the lived reality of residents, not just modelled projections, or national targets.
4. Housing targets be more clearly aligned with infrastructure capacity, environmental limits, and completed local planning frameworks before the Variation is adopted. Growth should follow capacity, not precede it.
5. The precedent-setting effect of increased housing targets on future planning decisions be explicitly considered. Once targets are embedded in policy, they will be used to justify developments regardless of local constraints.

Note on Public Access to Information

Planning decisions of this nature will shape the future of Bray for decades. Residents have a fundamental right to know about, understand, and participate in decisions that will affect their homes, their environment, and their quality of life. That right is not a formality. It is the foundation of democratic planning.

When consultations are conducted with minimal publicity, when significant variations are buried in technical documents, and when residents only learn of them by chance through social media, the system is not serving the public. It is excluding them.

I ask that Wicklow County Council reflect on how this consultation was conducted and commit to clearer, more accessible, and more proactive public engagement for all future planning decisions that affect our community.

Kind regards,

Alison Wildes [REDACTED]