

	<h1>Variation No.6</h1>
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Who are you:	Agent
Name:	Glenveagh Homes Ltd.
Reference:	VAR6-114554
Submission Made	January 16, 2026 11:51 AM

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- Chapter 1 – Proposed Variation No. 6
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On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the proposed variation no. 6 relating to the Wicklow County Development Plan 2022-2028 (as varied).

Please see enclosed submission.

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GLENVEAGH HOMES LTD SUBMISSION TO DRAFT VARIATION NO. 6

Prepared on behalf of
Glenveagh Homes Ltd

January 2026

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DOCUMENT CONTROL SHEET

Client:	Glenveagh Homes Ltd.
Project Title:	Submission to Variation no. 6 WCC CDP
Document Title:	Submission to Variation no. 6

Rev.	Status	Author(s)	Reviewed By	Approved By	Issue Date
DV1	Draft	RK	IL	RK	13-01-2026
F01	FINAL	RK	IL	RK	16-01-2026

1.0 INTRODUCTION

On behalf of our client Glenveagh Homes Ltd. Block C, Maynooth Business Campus, Straffan Road, Maynooth, Co Kildare we wish to make a submission on the proposed variation no. 6 relating to the Wicklow County Development Plan 2022-2028 (as varied).

Glenveagh is an Irish homebuilder who deliver high-quality new homes with an emphasis on high-quality design, innovation, sustainability, and people friendly communities. In this regard Glenveagh are uniquely positioned to help address the chronic housing shortage due to their ability to deliver large quantities of new homes in an efficient manner.

Glenveagh Homes welcome the publication of the proposed variation no. 6 and support the need for the increased core strategy numbers to guide the future development of the County, in the short term.

The purpose of this submission is to ensure that Variation no. 6 achieves the goal of the Housing Growth Guidelines in activating sites that can deliver housing in the short-term, within the remaining life of the County Development Plan to 2028. This will require a pivot away from the long-term strategic land banks to the smaller/medium sized sequentially serviced landbanks.

Within this context, this submission seeks to demonstrate the suitability of the lands at Keatingstown in the key town of Wicklow (see Appendix 1) for residential development to ensure housing can be delivered on the site in the short-term to contribute to the increased housing target for the County within the lifetime of the Development Plan.

We note the separate but related “*Call for Sites: Land Suitable for Residential Development Non-Statutory Consultation*” made by Wicklow County Council at the end of December 2025, which invites landowners, homebuilders and other interested parties (including members of the public) to make a submission, identifying possible sites that they suggest could be considered for zoning for new housing development and could meet the objectives of the Guidelines in terms of contributing to the acceleration of housing delivery.

Our client supports the call for sites and will make a submission in due course on same. In the interim, we suggest that the call for sites should be used to inform the activation of the core strategy housing targets in the short term to 2028 for the remainder of the current Development Plan and beyond.

For the Planning Authority to realise the future growth requirements and accelerated housing delivery in the short term, there needs to be a significant pivot towards sequentially serviced landbanks within towns such as Wicklow/Rathnew and our client's lands, particularly where there is an active developer willing to bring the site forward for development in the short-term, subject to an appropriate zoning context.

2.0 FUTURE DELIVERY OF HOUSING GROWTH

We note the Wicklow County Council Meeting held on 3rd November 2025 and published minutes on the Council's website. This included discussion on WCC's recent meeting with the Taoiseach, the Tánaiste, the Minister for Housing and Minister for State and Housing in relation to additional delivery of housing within the county and the targets that have been set for Wicklow by the NPF Implementation Guidelines. In this respect, the Chief Executive noted during the meeting that:

*"We have now been asked at that meeting on Thursday to increase again. I think our housing target was 2,084 per annum, Minister Cummins says he wants us to deliver **more than 3,000 units per year**". (JSA emphasis)*

This target of over 3,000 units per annum aligns with the inclusion of 50% additional provision to the figure of 2,068 units per annum as set out in Appendix 1 of the Guidelines. Importantly, we note that in the meeting with WCC, the Taoiseach advised the Chief Executive that *"you zone land, we'll deliver the infrastructure"*. This is clear commitment from the Government to WCC that the delivery of more than 3,000 units per annum will be facilitated by the necessary infrastructure.

The meeting transcript also notes that WCC have been *"asked to look at additional zoning that's serviced around the county, lands that are serviced around the county"*. This confirms that existing serviced lands should be identified, sought out and brought forward for development in the short term to meet the target per annum set out in the figures in Appendix 1 plus the 50% additional provision included in Policy & Objective 2 of the NPF guidelines.

2.1 CORE STRATEGY AND ACTIVATION/COMPLETION RATES – EVIDENCE FROM PREVIOUS DEVELOPMENT PLANS

The challenge to the delivery of housing is apparent in the housing completions is illustrated below. It is noted that completions in Wicklow County Council at 5,502 units were c. 53% of the target of 11,028 (1,838 per annum) over the CDP period 2016-2022, resulting in a shortfall of 5,526 no. dwellings over that period. Therefore, the CDP clearly does not meet this key requirement to ensure that the CDP core strategy has made adequate provision for zoned and serviced sites that will come forward during the lifetime of the plan.

Table 2.1: Total Housing Completions and Core Strategy Wicklow 2016-2022

	2017	2018	2019	2020	2021	2022	Total 2016-2022
Completions	478	586	1,115	1,038	747	1,538	5,502
WCC CDP Core Strategy 2016-2022	1,838	1,838	1,838	1,838	1,838	1,838	11,028
Difference/Shortfall	-1,360	-1,252	-723	-800	-1,091	-300	-5,526

Source: CSO & JSA. Note Plan adopted in November 2016. Figures for 6 yrs 2017-2022.

It is noteworthy that for the current Development Plan period 2022-2028 the core strategy numbers for Wicklow decreased by 2,561 dwellings or c. 23% from 11,028 (1,838 per annum) for the 2016-2022 Plan to 8,467 dwellings (1,411 per annum).

For the period since the adoption of the 2022 Plan, we note that completions were 1,428 in 2023, 1,338 in 2024 and 1,276 to Q3 in 2025 (CSO 2025). While this represents a noteworthy increase, the average across the first 3 years is less than 50% of the requirements of the Government which envisages c. 3,000 new dwellings for Wicklow County and which illustrates

the challenges in meeting the delivery of units. In order to meet the challenging targets, the Council needs to harness all of the available zoned land and identify suitable sites, which can deliver in the short to medium.

Table 2.2: Difference between Housing Target 2016 WCC CDP and 2022 WCC CDP for 2028

Existing Housing Stock 2011	Target Housing Stock 2022 (2016 WCC CDP)	Actual (Census 2022)	(A) Target Housing Stock 2028 (2016 WCC CDP)	(B) Target Housing Stock 2028 (WCC 2022-2028 CDP)	Difference between 2016 WCC CDP and 2022 current WCC CDP Target for 2028 (A-B)
54,351	69,822	59,629	85,589	68,096*	-17,493

*Using 2022 Census Baseline + 8,467 (Table 3.2)

The 2016 CDP also indicated a target housing stock of some 69,822 dwellings in 2022. From the Census the overall housing stock in 2022 was 59,629 no. dwellings (including holiday homes) or a shortfall/difference of some 10,193 dwellings. Using the 2016 WCC CDP as a baseline, the observed shortfall of target housing stock for 2028 envisaged in the 2016 Plan and the 2022 Plan is some 17,493 dwellings for Wicklow. While the proposed variation no. 6 will increase the targets, they will still be below the targets set some 10 years ago.

Table 2.3: WCC CDP Annual Targets, 2016 CDP, 2022 CDP & Proposed Variation no. 6

Year	2016 CDP Annual Housing Target	2016 CDP and 2022-2028 CDP Annual Housing Target	2016 CDP, 2022-2028 CDP & Proposed Variation no. 6
2017	1,838	1,838	1,838
2018	1,838	1,838	1,838
2019	1,838	1,838	1,838
2020	1,838	1,838	1,838
2021	1,838	1,838	1,838
2022	1,838	1,838	1,838
2023	1,838	1,411	1,411
2024	1,838	1,411	1,411
2025	1,838	1,411	1,411
2026	1,838	1,411	2,068
2027	1,838	1,411	2,068
2028	1,838	1,411	2,068
Total	22,056	19,494	21,465
Difference compared to 2016 WCC Housing Targets	N/A	-2,562	-591

Using the annual housing targets from the 2016 WCC CDP, 2022 CDP and proposed variation no. 6. it can be seen that there is a slight decrease from the housing targets of 2016 of some **591** no. housing units. Given the housing crisis it is incumbent on Wicklow County Council to increase the housing targets to at least 3,000 units per annum. In conjunction, with this Wicklow County Council needs to identify the lands which can actually deliver these dwellings over the timeframe of the remainder of the County Development Plan period.

3.0 KEY RECOMMENDATIONS AND REQUESTS

3.1 REQUEST/RECOMMENDATION NO. 1 APPLICATION OF “ADDITIONAL PROVISION” AND “FURTHER ADDITIONAL PROVISION” TO THE CORE STRATEGY

3.1.1 APPLICATION OF ‘ADDITIONAL PROVISION’

In the view of our client, it is imperative that Wicklow County Council utilise and apply the full 50% ‘additional provision’ as set out by Policy & Objective 2 of the NPF Implementation Guidelines and ‘further additional provision’ for the county. Whilst the updated Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions set out in Table 3.5 of the proposed Core Strategy may include some additional provision, this does not make sufficient provision to accommodate the anticipated population growth in Wicklow in the period to 2031 and beyond to 2040.

It is a policy and objective of the Ministerial Guidelines that an ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority is reflected within the Development Plan.

Appendix 1 of the Housing Growth Guidelines 2025 requires a new annual housing allocation of 2,068 units in county Wicklow in the period 2025-2034, equating to an additional 657 units per annum. Applying 50% additional provision as advised by the NPF implementation guidelines, an allocation of 3,102 units would be required, equating to an additional 1,691 units per annum across the county.

Table 3.5 of the proposed variation allows for a housing target of some 17,098 between 2025 and 2031, which equates to just under 3,000 units per annum, reduced to 12,054 no. dwellings. However, this figure is reduced to c. 2,000 units per annum, through the exclusion of current dwellings under construction and extant permissions. It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction and therefore **do not** provide additional residential capacity as they are historic permissions.

It is recommended that extant/permitted units should also not be included in the core strategy as a large number of them were likely permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery. The practice of continued use of extant permissions to reduce future housing targets should be discontinued.

We would further highlight that the new housing target is predicated on the inclusion of lands which have been zoned for development for extended periods but will not come onto stream in the short to medium term in any meaningful way. We would strongly urge that Wicklow County Council adjust Table 3.5 to a more realistic appraisal of deliverable housing, in the short term, rather than relying on sites which are tier 2 lands. The call for sites consultation should be used to ascertain the lands which are capable of delivering much needed housing in the short term and Table 3.5 adjusted accordingly.

We understand that Wicklow County Council has been instructed by the Minister for Housing, Local Government & Heritage and An Taoiseach to progress with making provision for the implementation of in excess of 3,000 units per annum, in accordance with the NPF Implementation Guidelines to accommodate projected population growth in the county. It is therefore imperative the proposed variation includes housing allocations to reflect this.

3.1.2 APPLICATION OF 'FURTHER ADDITIONAL PROVISION'

The Housing Growth Guidelines state that:

"Lands which offer the potential to meet the objectives of these Guidelines but are not serviced or serviceable during the lifetime of the current adopted development plan, may be identified as 'Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' in order to give clear strategic direction to future development locations."

*The residential development capacity associated with the parts of these sites/areas that are not likely to come forward for development within the period of the current adopted plan may be considered as further 'additional provision' over and above the baseline housing growth requirements and the up to 50% 'additional provision' referenced above. (**Page 10 NPF Implementation Guidelines, 2025**).*

It is submitted that the reliance of Wicklow County Council on such Tier 2 sites or sites which are effectively *Long-Term Strategic and Sustainable Development Sites/Opportunity Areas* is contrary to the correct application of the Section 28 NPF Implementation Guidelines which clearly state that these long term development sites/opportunity areas ***"may be considered as further 'additional provision' over and above the baseline housing growth requirements and the up to 50% 'additional provision' referenced above."*** (JSA emphasis added).

From the above, it is evident that the S28 Guidelines recognise the challenge in short term delivery and are clearly requiring that the Long-Term Development Sites to be considered as ***"further additional provision" in addition to the "50% additional provision"***.

In light of this we urge WCC to take the opportunity to rectify the core strategy numbers and allocate additional core strategy provisions to towns such as Wicklow/Rathnew which have the necessary infrastructure already in place to deliver much needed housing.

This may entail some of the lands in the Long Term Strategic Sites (Tier 1) being brought forward quicker as ***"additional provision"*** where they can be serviced while other lands which are clearly Tier 2 (such as lands in Bray) will revert to being ***"further additional provision"***, which would be over and above the additional core strategy growth.

This approach is further confirmed and outlined in the Section 28 Guidelines which state that there should be a *"particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan."*

It would also be in compliance with NPO 101 of the NPF which requires that *"Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan."*

Furthermore, the Guidelines encourage that the assessment of the availability of lands to come forward for development within the remaining period of the plan *"should take into account factors including the planning history of zoned lands and activation of sites, and the availability of or potential for servicing."*

Crucially the S28 Guidelines state that *"Where the planning authority considers that lands may not come forward for development within the remaining period of the existing plan, it may be necessary **to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium term.**"* (JSA emphasis added).

REQUEST/RECOMMENDATION NO. 1 APPLICATION OF “ADDITIONAL PROVISION” AND “FURTHER ADDITIONAL PROVISION” TO THE CORE STRATEGY

Glenveagh Homes Ltd., have serviced lands in Keatingstown Wicklow (see Appendix 1) which can deliver upon the proposed variation no. 6 which are capable of delivering new homes in a scalable and sustainable manner to make up the shortfall in the “*additional 50% provision*” contained in the proposed variation through the inclusion currently of ‘*further additional provision*’ lands (Long Term Development Sites/Tier2) in the final Table 3.5.

Given the housing crisis it is incumbent on Wicklow County Council to increase the housing targets to at least 3,000 units per annum (excluding dwellings under construction and extant permissions. In conjunction, with this Wicklow County Council needs to identify the lands which can actually deliver these dwellings over the timeframe of the remainder of the County Development Plan period.

3.2 REQUEST/RECOMMENDATION NO. 2 UPDATED INFRASTRUCTURAL ASSESSMENT

The Housing Growth Guidelines 2025 require that Planning authorities “***in all instances should prepare a ‘Settlement Capacity Audit’ as part of a review or variation process in line with the provisions of the “Development Plans - Guidelines for Planning Authorities” (2022), in order to both identify zoned serviced/serviceable lands, and to highlight infrastructural requirements.***” (JSA emphasis added).

According to the Housing Growth Guidelines the Settlement Capacity Audit should “*identify zoned serviced/serviceable lands with residential development potential in all relevant settlements, specifying enabling infrastructure, for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, schools provision and community facilities.*”

WCC have not prepared a Settlement Capacity Audit (SCA), from a review of the proposed variation. While there was an Infrastructural Assessment prepared as part of the 2022 CDP review, it should be updated to reflect advances in the provision of infrastructure in the interim. It is submitted that it is critical that a SCA is be undertaken so that there is clarity on the actual delivery of much needed housing for the remainder of the CDP period to 2028.

It is recommended that the Council undertake a detailed examination of the lands which can deliver much needed housing in the short to medium term rather than relying on landbanks which will take 10-15 years to actually build out the allocations currently assigned for the remainder of the current plan to 2028 and beyond to 2031. This could be undertaken as part of the “*call for sites*” consultation.

Where the Planning Authority considers that lands may not come forward for development within the remaining period of the plan, the Housing Growth Guidelines (section 3.1) state that it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium-term.

We strongly urge that WCC consider options to rectify this delivery gap until the Tier 2 lands become available. This ultimately should entail revisions to the methodology of the core strategy table 3.5 to provide a realistic examination and evidence-based approach to ensure the delivery of housing in the short to medium term, to include the remainder of the current Development Plan period and beyond. Ultimately this will require the zoning of additional residential lands that are not so infrastructurally constrained, or specifying opportunities for other landbanks to be brought forward earlier.

We note the “*Non-Statutory Consultation*” made by Wicklow County Council at the end of December 2025, which invites landowners, homebuilders and other interested parties (including members of the public) to make a submission, identifying possible sites that they suggest could be considered for zoning for new housing development and could meet the objectives of the Guidelines in terms of contributing to the acceleration of housing delivery over the next 15 years.

REQUEST/RECOMMENDATION NO. 2 UPDATED INFRASTRUCTURAL ASSESSMENT

There is no assessment in the variation of the likelihood of the lands which “*will come forward for development within the remaining period of the plan*” which is required by the Housing Growth Guidelines.

Our client supports the call for sites and will make a submission in due course on same. In the interim, we would suggest that the call for sites should be used to inform the activation of the core strategy housing targets in the short term to 2028 for the remainder of the current Development Plan and beyond such as our client’s landholding at Keatingstown, Wicklow (see Appendix 1).

Where the Planning Authority considers that lands may not come forward for development within the remaining period of the plan, the Housing Growth Guidelines (section 3.1) state that it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium-term.

We strongly urge that WCC consider options to rectify this delivery gap until the Tier 2 lands become available. This ultimately should entail revisions to the methodology of the core strategy table 3.5 to provide a realistic examination and evidence-based approach to ensure the delivery of housing in the short to medium term, to include the remainder of the current Development Plan period and beyond. Ultimately this will require the zoning of additional residential lands that are not so infrastructurally constrained or specifying opportunities for other landbanks to be brought forward earlier.

3.3 REQUEST/RECOMMENDATION NO. 3 CORE STRATEGY - POPULATION AND HOUSING TARGETS – TABLE 3.1

Table 3.1 identifies some 6,204 no. units over the remaining 3 years of the Development Plan over the years 2026-2028. However, it is submitted that the increase does not go far enough to ensure a sustainable supply of new housing and should be increased to include the additional provision of up to 50%.

Table 3.1 of Proposed Variation No. 6 sets out revised housing targets, identifying a requirement for 7,238 units for the period Q1 2025 to Q2 2028 and 14,476 units for the period Q1 2025 to Q4 2031. These figures accord with the Housing Growth Guidelines, which establish an updated growth benchmark of approximately 2,068 dwellings per annum for County Wicklow to 2034 and a longer-term target of 26,666 units to 2040.

It is clear that the Housing Growth Guidelines see a 3 stage approach to the review of Core Strategy housing targets as follows:

- Stage 1 relates to the inclusion of the new NPF targets as set out in Appendix 1 of the Housing Growth Guidelines.

JSA Commentary: This has been undertaken by WCC in Table 3.1. However, the transition to Table 3.5 and the application of additional provision is unclear and is recommended to be updated.

- Stage 2 relates to the inclusion of up to 50% **additional provision**.
JSA Commentary: This has not been undertaken by WCC in Table 3.1. It is unclear due to the timelines employed by WCC in table 3.5 whether this has been included.
- Stage 3 relates to **further ‘additional provision’** over and above the baseline housing growth requirements (stage 1) and the up to 50% ‘additional provision’ (stage 2). Required where there are tier 2 lands (and long term development sites) included in the core strategy table which is clearly the case with table 3.5. These are lands “***that are not likely to come forward for development within the period of the current adopted plan.***” (Housing Growth Guidelines pg. 9).
JSA Commentary: This has not been undertaken. It is recommended that a full review of serviced lands is undertaken and identified and clarified in the final core strategy table.

From our review, however, it is not clear how the level of “*additional provision*” referenced in Policy & Objective 2—which envisages scope for 50% additional growth above the baseline targets—has been reflected in the figures presented for the period to 2031. Further explanation on this aspect would be welcomed and would so as to ensure an adequate supply of zoned residential lands.

In the view of our client, it is imperative that Wicklow County Council utilise and apply the full 50% ‘additional provision’ as set out by Policy & Objective 2 of the NPF Implementation Guidelines for the county and include in Table 3.1.

Glenveagh are seeking that the planning authority’s decision not to account for the full 50% ‘*additional provision*’ over and above the standard housing provision requirements laid out in Appendix 1 of Guidelines is allocated as a matter of urgency in Table 3.1.

The NPF Implementation: Housing Growth Requirements Guidelines 2025 are clear and require the Local Authorities to assess whether the lands identified are capable of delivering within the lifetime of the plan and where that is not the case alternative lands should be zoned. It is submitted that the sites included in the variation will not deliver within the remaining lifetime of the Plan and therefore alternative sites should be included such as our clients’ landholdings outlined in this submission.

REQUEST/RECOMMENDATION NO. 3 CORE STRATEGY - POPULATION AND HOUSING TARGETS – TABLE 3.1

We note Appendix 1 of the Housing Growth Guidelines 2025 requires a new annual housing allocation of 2,068 units in county Wicklow in the period 2025-2034, equating to an additional 657 units per annum. Applying 50% headroom as advised by the NPF implementation guidelines, an allocation of 3,102 units would be required, equating to an additional 1,691 units per annum across the county.

We understand that Wicklow County Council has been instructed by the Minister for Housing, Local Government & Heritage and An Taoiseach to progress with making provision for the implementation of in excess of 3,000 units per annum, in accordance with the NPF Implementation Guidelines to accommodate projected population growth in the county.

It is therefore imperative that the proposed variation includes housing allocations of c. 3,000 units per annum to reflect this in Table 3.1.

3.4 REQUEST/RECOMMENDATION NO. 4 - TABLE 3.3

Table 3.3 sets out the rationale for targeted settlement growth for the period 2022-2031. It is recommended that further consideration is given to the deliverability of the housing targets set out for the individual towns. It is highly unlikely that Bray will deliver the 6,299 dwellings (indicated for the period 2022-2031), having regard to the constraints of the geography of the town's footprint and the long term development site at Fassaroe which while some development will likely come on stream in the short term, the site would be expected to deliver a long term stream of development over a series of development plans due to the infrastructural deficits. As such we would urge that WCC consider reallocating a proportion of the core strategy allocation to other towns such as Wicklow/Rathnew.

It is recommended that further justification is provided for the various towns to include wastewater treatment infrastructure & water supply commentary which is already contained in Appendix 9 of the current Wicklow CDP.

For example, for Wicklow Town and Enniskerry we would recommend the inclusion of the following additional text in **green**:

Table 3.1: Recommended Additional Text – Table 3.3

Level	Town	Housing Stock 2022	Housing Growth 2022-2031	Commentary
2	Wicklow	6,231	3,739	Key Towns are identified for substantial growth rates of not less than 50% having regard to their identification in the RSES as towns suitable for higher levels of growth. Wicklow Town – Rathnew is determined to have the capacity to achieve and slightly exceed 50% in the short to medium term, particularly taking into account that it is due to be served in the short to medium term by enhanced rail services (electrification of line to Wicklow Town). Served by the Wicklow Wastewater Treatment Plant currently operating below design capacity (34,000pe, operating at c. 19,000pe) and has capacity to accommodate the growth targeted by the Core Strategy (including Ashford) Supplied with potable water from the Vartry water supply and is well within operational capacity. Upgrade to increase capacity is due for completion in 2021. Local level supporting infrastructure to be provided in accordance with the implementation of relevant local planning permissions and the Council's capital investment programme.
4	Enniskerry	729	437	Enniskerry is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Enniskerry is well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County. Served by the Enniskerry Waste Water Treatment Plant currently operating below design capacity (6,000pe, operating at c. 2,500pe) and has capacity to accommodate the growth targeted by the Core Strategy." Supplied with potable water from the Vartry water supply and is well within operational capacity. Upgrade to increase capacity is due for completion in 2021." Local level supporting infrastructure to be provided in accordance with the implementation of relevant local planning permissions and the Council's capital investment programme."

REQUEST/RECOMMENDATION NO. 4 – TABLE 3.3

It is recommended that further consideration is given to the deliverability of the housing targets set out for the individual towns. It is highly unlikely that Bray will deliver the 6,299 dwellings (indicated for the period 2022-2031), having regard to the constraints of the geography of the town's footprint and the reliance on long term development sites which would be expected to deliver a long term stream of development over a series of development plans due to the infrastructural deficits.

As such we would urge that WCC consider reallocating a proportion of the core strategy allocation to other towns such as Wicklow/Rathnew.

It is recommended that further justification is provided for the various towns to include wastewater treatment infrastructure & water supply commentary which is already contained in Appendix 9 of the current Wicklow CDP as outlined above in **green**.

3.5 REQUEST/RECOMMENDATION NO. 5- TABLE 3.4

Table 3.4 outlines the future housing capacity for Wicklow (for Level 1-6 settlements). We would question the phasing and priority assigned to the towns for the column which relates to *“of which is subject to Phase 2/ Priority 2 designation”*. The footnote states that Where ‘0’ stated, this means that no land is subject to the Phase 2 / Priority 2 designation – all lands is ‘Phase 1’.

From a review of table 3.4 it is respectfully submitted that greater clarity is provided in respect of the terminology. While recent Planning Frameworks within the administrative area of Wicklow, have introduced the concept of Phase 1/Phase 2 lands, it is important that the core strategy and the future housing capacity is clear on what lands that (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan (as per NPO 101) which states:

“Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.”

Currently the table suggest that the entirety of the zoned land in Bray is serviceable which is clearly not the case as the zoned land Bray is reliant to a substantial degree on the long term development site at Fassaroe which while some development will likely come on stream in the short term, the site would be expected to deliver a long term stream of development over a series of development plans due to the infrastructural deficits and unlikely to deliver any meaningful contribution to the core strategy for the remaining 3 years of the current Development Plan period to 2028. This is acknowledged in the footnote of table 3.4 which states that the lands are *“serviceable by 2031”*, which is clearly outside the current development plan period. As outlined in the Infrastructural Assessment of the current plan (Appendix 9) the lands relating to the strategic sites (Fassaroe and Golf Club) are Tier 2 lands arising from a wide range of strategic transportation upgrades.

For Bray the table indicates that the entirety of the estimated 7,405 is Tier 1/Priority designation. While this may be the case in respect of the now expired Bray LAP, as the LAP did not include such designations, it is recommended that this table is clarified, particularly as Bray contains significant areas of land which is in fact Tier 2 lands as set out in the Infrastructural Assessment Report (Appendix 9 of the 2022-2028 CDP refers).

REQUEST/RECOMMENDATION NO. 5 – TABLE 3.4

From a review of table 3.4 it is respectfully submitted that greater clarity is provided in respect of the deliverability of the units identified in the core strategy. Currently the table suggest that the entirety of the zoned land in Bray is serviceable which is clearly not the case as the zoned land in Bray is reliant to a substantial degree on the long term development site at Fassaroe which while some development will likely come on stream in the short term, the site would be expected to deliver a long term stream of development over a series of development plans. As outlined in the Infrastructural Assessment of the current plan (Appendix 9) the lands relating to the strategic sites (Fassaroe and Golf Club) are Tier 2 lands arising from a wide range of strategic transportation upgrades.

As such we would urge that WCC consider reallocating a proportion of the core strategy allocation from Bray and Arklow to other towns such as Wicklow/Rathnew.

3.6 REQUEST/RECOMMENDATION NO. 6 - TABLE 3.5

Our client is disappointed with the lack of growth identified for Wicklow town and is seeking that the future core strategy takes into account existing sites which can cater for the required growth identified by the Government.

3.6.1 REAPPRAISAL OF INCLUSION OF UNDER CONSTRUCTION AND EXTANT PERMISSIONS

It is submitted that an updated Table 3.5 needs to firstly exclude the 2,768 no. units identified as being under construction as these units are already under construction and therefore do not provide additional residential capacity over the remainder of the development plan period and beyond. It is respectfully submitted that future housing targets should not be relying on previously accounted for permitted dwellings. It is recommended that this 'double counting' is removed from the final update to the core strategy.

In addition, it is recommended that permitted units should also not be included as they were permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery. A significant proportion of permissions are not activated. Reasons for this include physical infrastructure such as roads and water, as well as social infrastructure such as schools and community facilities. In our experience many permissions will not be delivered during the plan period. The practice of continued use of extant permissions to reduce future housing targets should be discontinued.

3.6.2 HOUSING TARGET ALLOCATIONS

The table below provides a comparison of the allocations for the settlements for the existing core strategy 2022 -2028 and the proposed variation (2025-2031).

Table 3.2: Comparison of Housing Growth 2022-2028 & 2025-2031

Settlements Levels 1-6 (excludes villages Levels 7-10)	Existing 2022-2028 Plan	% Allocation	Proposed Variation no. 6 (Table 3.5) 2025-2031	% Allocation
Bray	4,026	50.4%	5,526	30.9%
Wicklow Rathnew	1,267	15.9%	3,170	17.7%
Arklow	790	9.9%	3,793	21.2%
Greystones Delgany	508	6.4%	1,717	9.6%

Settlements Levels 1-6 (excludes villages Levels 7-10)	Existing 2022-2028 Plan	% Allocation	Proposed Variation no. 6 (Table 3.5) 2025-2031	% Allocation
Blessington	393	4.9%	806	4.5%
Baltinglass	85	1.1%	170	0.9%
Enniskerry	36	0.5%	418	2.3%
Kilcoole	140	1.8%	878	4.9%
NTMK	433	5.4%	545	3.0%
Rathdrum	68	0.9%	190	1.1%
Ashford, Aughrim, Carnew, Dunlavin	129	1.6%	489	2.7%
Avoca, Donard Kilmac, Newcastle Roundwood	114	1.4%	206	1.2%
Total	7,989		17,908	

It is recommended that the allocation for Wicklow/Rathnew is increased further. We note that the increase for Arklow is c. 3,000 units. While we note that the recently constructed WWTP will cater for growth in Arklow, it is submitted that there is already sufficient capacity in the existing Wicklow WWTP operating at just 55% of its capacity (of c. 34,000 PE) as set out in the Infrastructural Assessment of the current CDP.

REQUEST/RECOMMENDATION NO. 6 – TABLE 3.5

Given the timelines involved in delivering housing, it is unlikely that 3,000 dwellings in Arklow will be delivered over the 6-year period identified to 2031. As such our client is seeking that additional allocations are provided to the key town of Wicklow/Rathnew over the lower order town of Arklow.

We would also query the additional 1,500 allocation to Bray as there are acknowledged constraints in delivery which will extend beyond the remainder of the current CDP to 2028 and indeed beyond the 2031 period identified in Table 3.5 of the proposed variation no. 6.

Having regard to the above, our client is seeking that an additional 2,000 units are allocated to the key town of Wicklow/Rathnew to reflect the already significant investment in infrastructure with no particular issues regarding capacity for services.

3.7 REQUEST/RECOMMENDATION NO. 7 - DENSITY CALCULATIONS

Using the figures in Table 3.5, we note that the effective densities set out are towards the higher end of the density ranges set out in the Compact Settlement Guidelines 2024. While our client supports the general content of the Compact Settlement Guidelines, the use of the higher threshold has the effect of reducing the amount of zoned land potentially required to deliver medium density compact development, which the Guidelines are striving to achieve.

This specific issue has already been addressed in a letter from the Minister for Housing to the Chief Executives of all the City and County Councils on the 11th of December 2025. This letter, which was signed by Minister James Browne TD and Minister John Cummins TD, advised Councils to apply “*realistic and deliverable residential density assumptions*”

Our client is concerned that the densities assumed in the proposed variation will give rise to a development format that is economically unviable. In such a situation, whilst the population and housing targets may have been increased through this variation, in practice because of the economic unviability, the measure will not give rise to the expansion in housing delivery that is urgently required and which is stated Government Policy. The result of the densities in

the proposed Variation No 6 is to place a reliance on the delivery of a development format which is well known to be economically unviable and has not generally come to fruition.

For example, for Bray the assumed density appears to be of the order of 75 dph whereas Wicklow/Rathnew, Arklow, and Greystones/Delgany have a density of c. 49.5, 43, and 49.6 respectively.

REQUEST/RECOMMENDATION NO. 7 – TABLE 3.5 DENSITY CALCULATIONS

It is recommended that the amount of land required is adjusted upwards to encourage the delivery of commercially viable medium density schemes, with appropriate densities. In this regard we would recommend that the final figures should:

- Reduce the density assumptions inherent in the tables and that net densities be reduced to 50uph in Bray and to 35uph in Levels 2 & 3 Settlements.

It is recommended that the amount of land required is adjusted upwards to encourage the delivery of commercially viable medium density schemes, with appropriate densities.

3.8 REQUEST/RECOMMENDATION NO. 8 EXCLUSIONS FROM CORE STRATEGY

It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction and therefore **do not** provide additional residential capacity as they are historic permissions. At the very least we request that the 2,768 no. units currently under construction are omitted from the final core strategy table and the remaining core strategy housing targets adjusted upwards accordingly and directed towards areas of the county where the short-term growth can be readily accommodated such as our client's lands.

In addition, it is recommended that extant/permitted units should also not be included in the core strategy as a large number of them were likely permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery. It is widely recognised that a significant proportion of permissions are not activated. Reasons for this include physical infrastructure such as roads and water, as well as social infrastructure such as schools and community facilities. In our experience many permissions will not be delivered during the plan period. The practice of continued use of extant permissions to reduce future housing targets should be discontinued.

We would query whether all of the 2,819 extant permissions will be built over the period indicated and therefore should also be omitted from the final core strategy table and the remaining core strategy housing targets adjusted upwards accordingly. It is noted that the 2022 CDP outlined some 3,153 extant units.

We would query how realistic is it that planning permission will be granted for 12,054 new units in time for that number of houses to be completed by 2031. Planning permission for substantially more than 3,000 units per annum would need to be granted each year 2026 – 2029 and construction would need to commence on all of them in the next 2-3 years at the latest to meet the targets.

For the Planning Authority to realise the future growth requirements there needs to be a significant pivot in the short term in terms of strategy by the Planning Authority away from the long term strategic land banks to the smaller/medium sized sequentially serviced landbanks within towns such as Wicklow/Rathnew and our client's lands, particularly where there is an

active developer willing to bring the site forward for development in the short-term, subject to an appropriate zoning context.

REQUEST/RECOMMENDATION NO. 8 EXCLUSIONS FROM CORE STRATEGY

We request that the 2,768 no. units currently under construction are omitted from the final core strategy table and the remaining core strategy housing targets adjusted upwards accordingly and directed towards areas of the county where the short-term growth can be readily accommodated such as our client's lands.

It is recommended that extant/permitted units should also not be included in the core strategy as a large number of them were likely permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery.

3.9 REQUEST/RECOMMENDATION NO. 9 – WICKLOW HOUSING ALLOCATIONS

It is clear from Appendix 9 of the CDP, that Wicklow is well served by wastewater treatment facilities and that there is additional capacity available not only to accommodate the core strategy increase indicated in the proposed variation but also for the additional provision of up to 50%. Wicklow town and environs from the commentary the Infrastructural Assessment report (Appendix 9 of the CDP) the WWTP was operating at just 55% of its capacity.

For the Planning Authority to realise the future growth requirements there needs to be a significant pivot in the short term in terms of strategy by the Planning Authority away from the long term strategic land banks to the smaller/medium sized sequentially serviced landbanks within towns such as Wicklow/Rathnew and our client's lands, particularly where there is an active developer willing to bring the site forward for development in the short-term, subject to an appropriate zoning context.

REQUEST/RECOMMENDATION NO. 9 – WICKLOW HOUSING ALLOCATIONS

Our client's lands at Keatingstown in Wicklow represent a consolidated, sequential, and policy-attuned opportunity for the sustainable evolution of the key town of Wicklow and request that consideration be given to increasing the core strategy allocations to Wicklow/Rathnew in an updated core strategy table 3.5. Based on a density of c. 35 dph, the subject lands have a capacity of some 450-500 dwellings (with a net site area of c. 14 hectares).

The subject lands can be connected to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development. The subject lands also meet the 2022 Guidelines suitability criteria based on the following:

- Road Access/ Pedestrian & Cycle Access – Direct via the recently completed Rocky Valley Road Part 8 improvement scheme to the south and Keatingstown Road to the north
- Foul Sewerage – Can be serviced and connected to existing infrastructure in the area.
- Water Supply – Can be serviced and connected to existing infrastructure in the area.
- Surface Water – Attenuation and discharge possible in line with SuDS and Wicklow CDP.
- Community Facilities – The subject site benefits from its close proximity to schools and local social infrastructure.

3.10 REQUEST/RECOMMENDATION NO. 10 – ENNISKERRY

Our client welcomes and supports that Enniskerry *“is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17.”* We would urge that the final Core Strategy table removes the existing units under construction as they do not contribute towards the future growth figures as they are effectively double counted from previous core strategy numbers.

3.10.1 ENNISKERRY TIER 1 LANDS

For Enniskerry from the commentary the Infrastructural Assessment report the WWTP was operating at just 41% of its capacity stating that Enniskerry town is: *“Serviced by the Enniskerry Waste Water Treatment Plant currently operating below design capacity (6,000pe, operating at c. 2,500pe) and has capacity to accommodate the growth targeted by the Core Strategy.”*

For water supply the Infrastructural report outlines that Enniskerry is: *“Supplied with potable water from the Vartry water supply and is well within operational capacity. Upgrade to increase capacity is due for completion in 2021.”*

In addition, no particular issues were identified in respect of Transport where the Infrastructural report outlines that: *“Local level supporting infrastructure to be provided in accordance with the implementation of relevant local planning permissions and the Council’s capital investment programme.”*

REQUEST/RECOMMENDATION NO.10 – ENNISKERRY

It is recommended that existing zoned Tier 1 serviced/zoned lands within the Enniskerry town boundary of the now expired Bray and Enniskerry LAP are maintained to assist in meeting the acknowledged short-term need for housing in the north Wicklow area.

4.0 CONCLUSIONS

This submission has been prepared on behalf of our client, Glenveagh Homes Ltd., in response to the public consultation on the proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028.

We would highlight that the additional dwellings identified by Wicklow County Council are not capable of being delivered over the remainder of the development plan period – a fact confirmed by the Tier 2 status of much of the remaining lands within Bray which are Tier 2 and not capable of being delivered within the remainder of the life of the current plan to 2028 and which are *Long-Term Strategic and Sustainable Development Sites/Opportunity Areas*.

We respectfully request that the recommendations set out within this submission are considered in Variation 6 of the Wicklow County Development Plan in relation to revised Core Strategy for County Wicklow.

We would be pleased to discuss this submission or the lands to which it relates, should the Council have any queries.

APPENDIX 1 CONTRIBUTION OF LANDS AT KEATINGSTOWN FOR COMPACT AND SUSTAINABLE GROWTH

1.0 INTRODUCTION

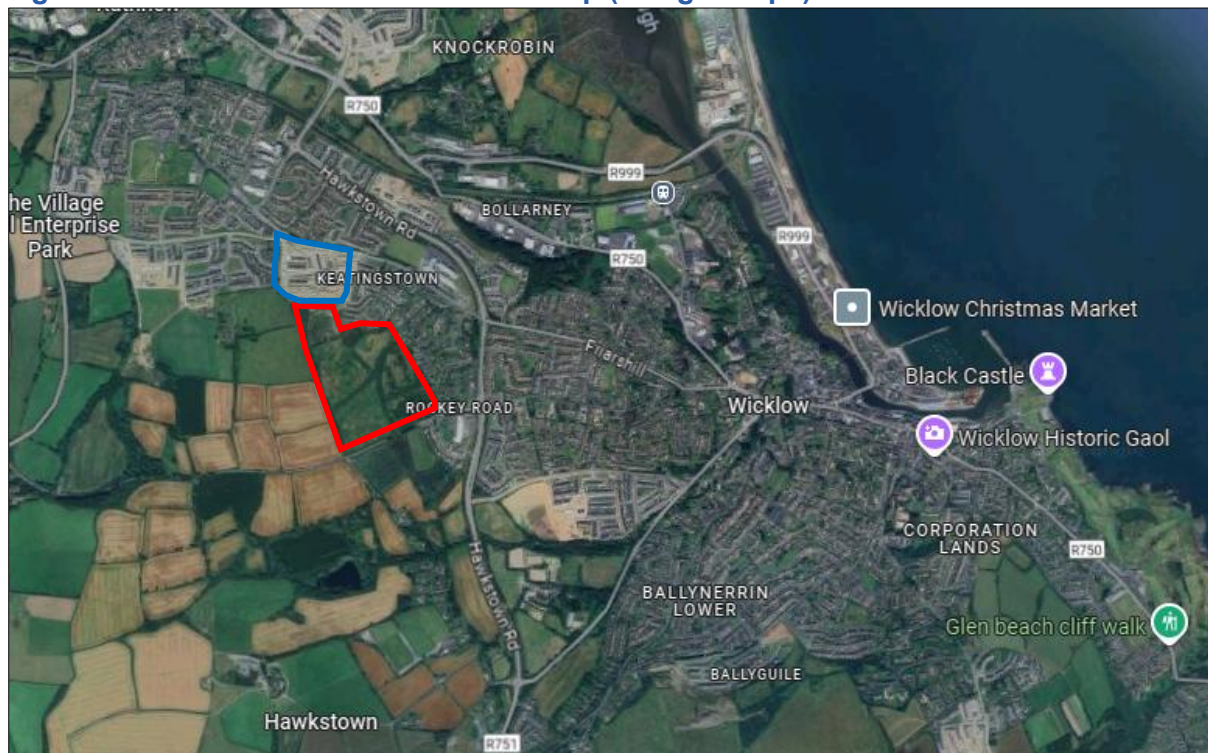
As has been highlighted throughout this submission, our client believes that specific lands situated at, Keatingstown and Enniskerry constitute appropriately serviced, accessible and sequential lands which are able to deliver residential development in the short to medium term.

The subject lands were previously zoned under residential use under older plans for Wicklow/Rathnew. It is submitted that in preparing the proposed Variation No. 6 to the CDP 2022-2028 that the Planning Authority need to be cognisant of the need to plan for significant future growth in the County, as incorporated by the proposed Variation in accordance with the *'NPF Implementation: Housing Growth Requirements'* guidelines.

2.0 SITE LOCATION AND CONTEXT

The subject lands of some 17.6 hectares are situated within immediately adjacent to the existing built-up area of Wicklow. The greenfield site is located in the townland of Ballynerrin, at the western edge of Wicklow town immediately adjacent to the existing built area of Carraigbawn, Keatingstown, and the Friary residential area.

Figure 1: Site Location & Client Ownership (Google Maps)



The lands are located c. 1.5 km from Wicklow town centre (via the Rockey Road) to the east and are located c.1 km to the east of the M11. The site is bounded by Rockey Road to the south lands under construction to the north (which includes a link road access to the site) and agricultural lands to the west. Agricultural access is currently provided from the Rockey Road. The subject site location is noted in red within Figure 1, below, with the area outlined in blue under ownership of the applicant. It is proposed that the new link road will form the western perimeter of the site, linking Rockey Road in the south with the existing roundabout at

Broomhall Court, which bounds the parcel of land under ownership of the applicant to the north.

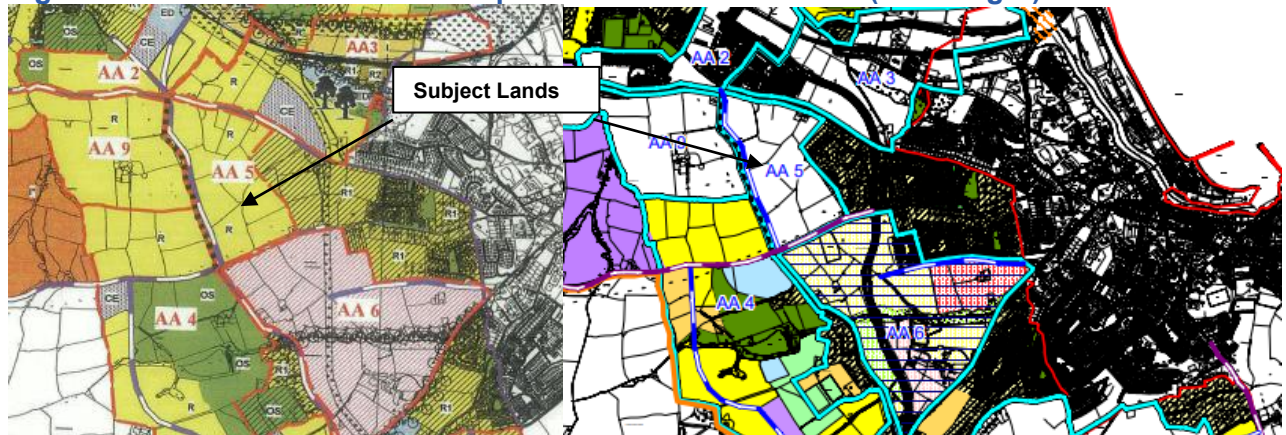
The site is notably accessible to both Wicklow town centre to the east and the M11 to the west. The area is well connected by local bus and train links, with Wicklow train station located approximately 1km north east. Cycling lanes are in place along Harmonstown Road, a short distance to the east of the site, accessed by Broomhall Court and Rockey Road respectively.

A range of local facilities including a Centra, pharmacy and hot food takeaway are located north west of the Broomhall roundabout adjacent to existing residential development and approximately 500m north west of the subject lands boundary. Educate Together Wicklow National School abuts the site across Rockey Road immediately to the south east and Colaiste Chill Mhantain located on Broomhall Court within short walking distance to the north. Rathnew AFC and GAA clubs are located further west, accessed by Seaview Heights. Broomhall Business Park lies beyond this area to the north. The site is therefore ideally placed to benefit from a range of facilities and services accessible to the subject lands.

3.0 PREVIOUS ZONING OF LANDS

The subject lands were previously zoned for residential land use within the previous Wicklow Town & Environs Local Area Plan 2008 and partially occupied a 25ha zoned area with an indicative capacity of 700 units. The lands have been identified for residential purposes dating back as far as 2001 and were re-designated as strategic land bank within the existing Wicklow-Rathnew Development Plan 2013-2019.

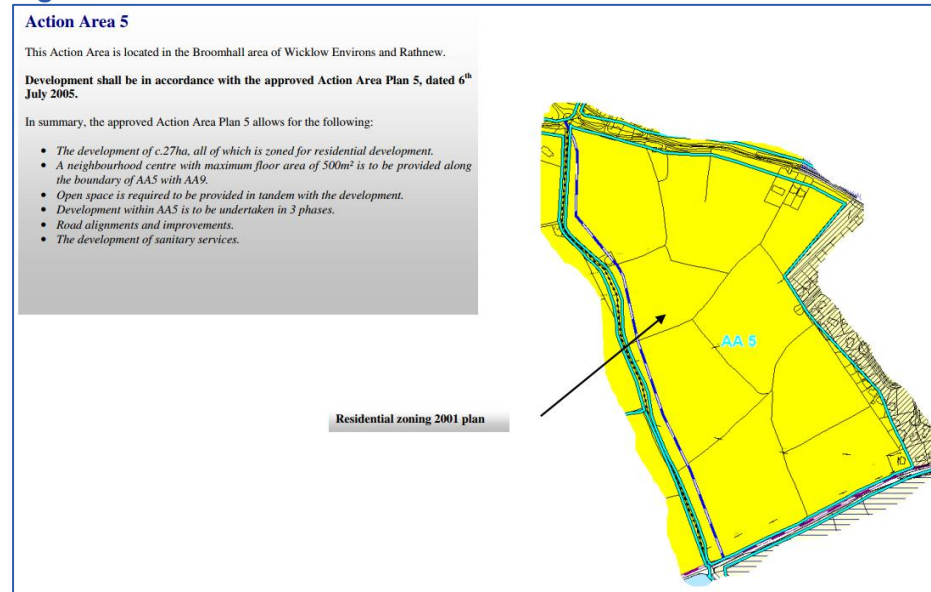
Figure 2: Wicklow Environs Development Plan 2001 and 2008 (left to right)



The subject lands were previously zoned Action Area 5 'AA5' within the previous Wicklow Environs Plan 2008-2014 as part of the phased development of the lands.

It is noted that the residential zoning 'R' at 'AA5' was identified for such use by the Wicklow Environs Local Area Plan 2001 Land Use Zoning Matrix. This highlights the substantial period of time which the site was deemed suitable for residential purposes by the planning authority, having been included in the Action Area Plan 5 of 2005 and retained with a residential zoning within the Wicklow Environs/Rathnew Local Area Plan 2008-2014. This forms a firm precedent for the acceptability of residential development at the subject lands in a present day context.

Figure 3: Action Area Plan 5



Source – Wicklow Environs/Rathnew Local Area Plan 2008-2014

3.0 REVIEW OF SUBJECT SITE – TIER 1 LANDS PROXIMITY OF SUBJECT LANDS TO SERVICES

Owing to its location and proximity to a wide range of services, facilities and amenities, the subject site is a highly suitable and accessible location for sustainable, sequential, residential-led development.

Consolidating future urban and residential development within the strategic consolidation zone identified in the figure will contribute to the following higher level policy objectives and population requirements to 2031:

- The consolidation of the area will contribute to meeting the future housing growth requirements from 2022 to 2031.
- It will contribute to compact growth and the consolidation of the urban form of Wicklow, thereby contributing to sustainable development.
- The strategic consolidation lands are readily serviced by extension of existing services and are all accessible by road and cyclepaths/footpaths to the south and the recently upgraded Rocky Road (as part of a Part 8 improvement scheme).
- Prioritisation of the area as tier 1 development lands would accord relevant policy provisions (Wicklow CDP Core Strategy and Development Plan Guidelines 2022)
- Wicklow Town - Rathnew is designated as the Level 2, 'Key Town' within the Core Region; a large economically active service town and county town, with high quality transport links and the capacity to act as a growth driver to complement other growth centres in the region.
- Wicklow Town is serviced by rail and bus and is located on the N/M11 strategic transport corridor. Wicklow port is of regional significance.

It is noted that the permitted development to the north included the first section of a potential distributor road between Broomhall Crescent and Rocky Road/Ashtown to the south. It is recommended that the adopted LAP includes a road objective so as to provide an enhanced interconnected road network in the area. The development of the lands would also allow for the provision of footpaths along the Rocky Road (as they relate to Glenveagh lands), to augment the recently completed Part 8 Rock Road Improvement Scheme located on the southern side of the Rock Road.

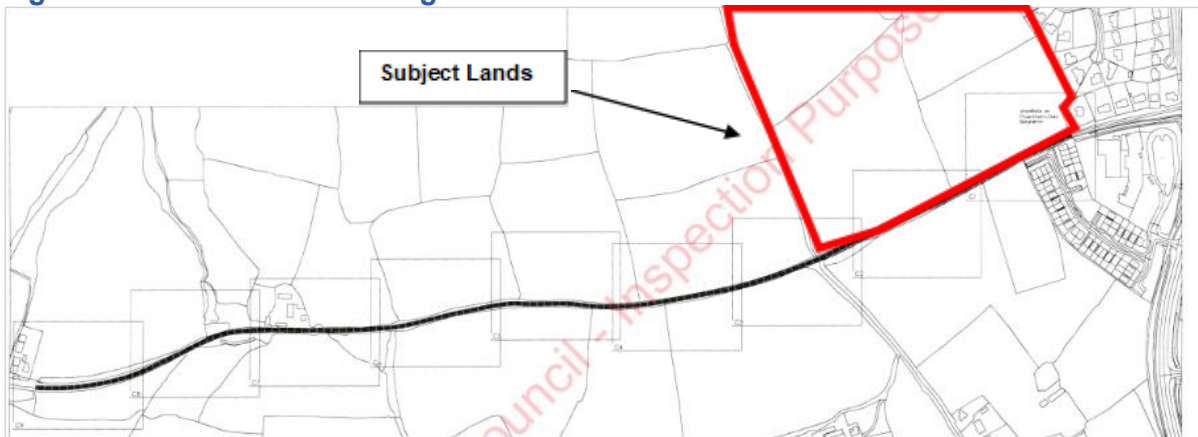
Figure 4: Recently Completed Rocky Road Improvement Scheme**Figure 5: Part 8 Road Widening**

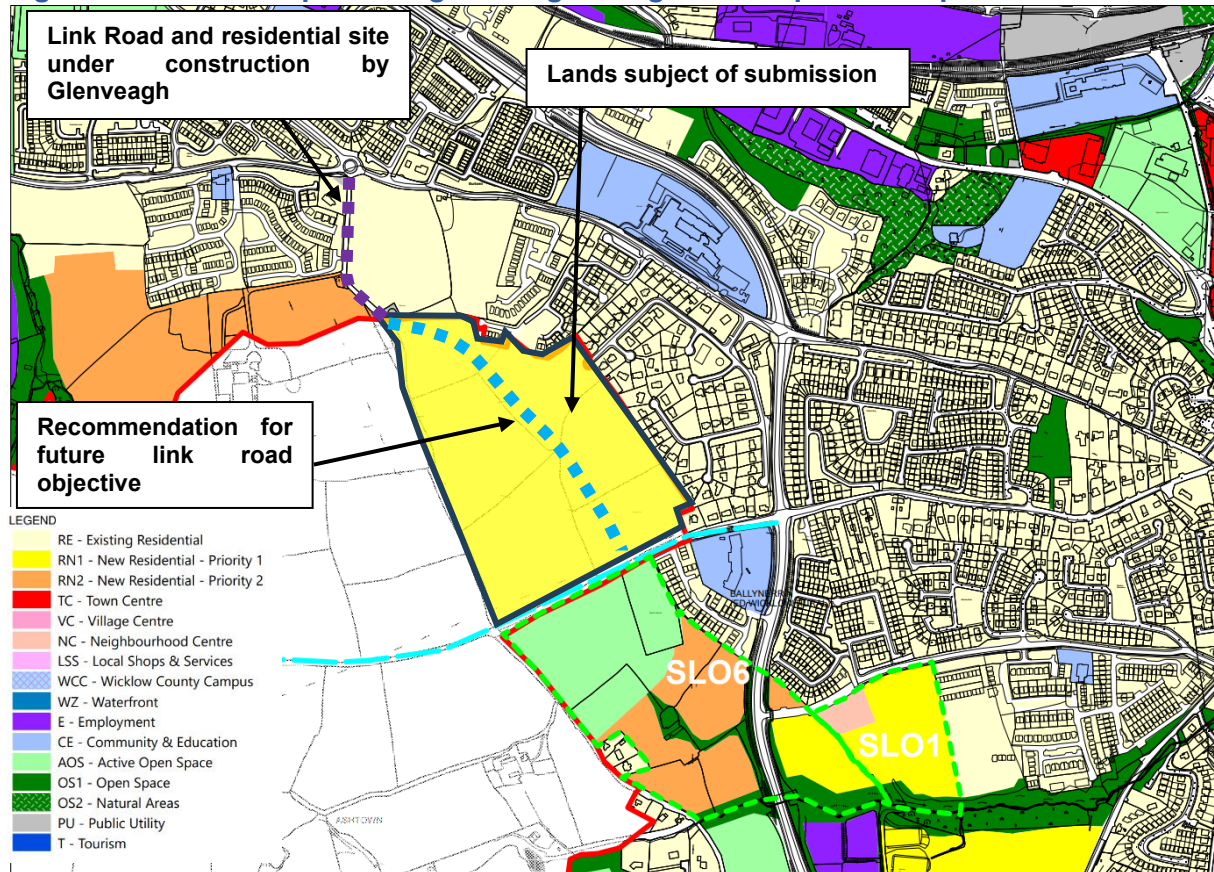
Figure 6: Extract - Map showing existing zonings and Sequential Expansion of Wicklow

Figure 7: Proposed Concept Diagram

Based on a density of c. 35 dph, the subject lands have a capacity of some 450-500 dwellings (with a net site area of c. 14 hectares).

KEATINGSTOWN WCC CDP 2022 - Appendix 9 Infrastructural Assessment Report

Appendix 9 of the Wicklow CDP outlines a high-level Infrastructural Assessment report. It is recommended that this report is updated to reflect the Tier 1/Tier 2 sites that are actually available for development in the short term to fulfil the objectives of securing the core strategy numbers for the remainder of the CDP period 2026-2028 and beyond.

WICKLOW TOWN TIER 1 LANDS

It is clear from Appendix 9 of the CDP, that the main population centres of Wicklow are well served by wastewater treatment facilities and that there is additional capacity available not only to accommodate the core strategy increase indicated in the proposed variation but also for the additional provision of up to 50%.

For example, for Wicklow town and environs from the commentary the Infrastructural Assessment report the WWTP was operating at just 55% of its capacity stating that Wicklow town is:

“Serviced by the Wicklow Wastewater Treatment Plant currently operating below design capacity (34,000pe, operating at c. 19,000pe) and has capacity to accommodate the growth targeted by the Core Strategy (including Ashford).”

For water supply the Infrastructural report outlines that Wicklow is:

“Supplied with potable water from the Vartry water supply and is well within operational capacity. Upgrade to increase capacity is due for completion in 2021.”

In addition, no particular issues were identified in respect of Transport where the Infrastructural report outlines that:

“Local level supporting infrastructure to be provided in accordance with the implementation of relevant local planning permissions and the Council’s capital investment programme.”

Having regard to the above, it is recommended that the core strategy recognises the surplus capacity in services which could be utilised in the short-term to deliver much needed housing.



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