



Variation No.6

Who are you:	Agent
Name:	Ardale Property Group
Reference:	VAR6-141318
Submission Made	January 16, 2026 2:20 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

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Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

16 January 2026

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

Dear Sir / Madam,

We, Brock McClure Planning & Development Consultants, 63 York Road, Dún Laoghaire, Co. Dublin, are instructed by our client, **Ardale Property Group, Unit B4, Oakfield Industrial Estate, Ninth Lock Road, Clondalkin, D22 XS28**, to make this submission in response to Proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028. Submissions are invited until 5 pm 16 January 2026 and this submission is made within this timeframe.

From the outset, we commend the Planning Authority for their proactive approach in varying the Wicklow County Development Plan 2022-2028, and in particular the Core Strategy to align with the NPF Implementation: Housing Growth Requirements (DHLGH, July 2025). We acknowledge the necessity of ensuring that housing growth projections are consistent with national policy and support the principle of plan-led, sustainable growth across the county.

In the first instance, we would like to raise significant concerns over the high density standards applied to calculate the amount of zoned land required to accommodate further growth up to 2031. Blanket assumptions at the upper limits and maximum standards should not be assumed particularly given that the Sustainable Residential Developments and Compact Settlements Guidelines assumes that “*in forecasting the capacity of lands for housing delivery where non-residential uses, such as main roads, retail, employment and major open spaces are being planned in conjunction with housing, an allowance needs to be made in the density assumption for the land that will be occupied by such uses, which may be upwards of 25% when forecasting the capacity of a land.*” In addition, the Compact Settlement Guidelines set out that densities should also correspond to established development patterns in certain locations and as such, we ask the Planning Authority to satisfy themselves as to whether the quantum of zoned residential lands identified under the Variation is sufficient to realistically meet the stated housing growth requirements, having regard to appropriate density ranges and local context.

Further, this submission relates specifically to the Level 6 settlement of Newcastle, and the implications of the proposed approach to population and housing growth for the future development of the settlement.

It is our considered view that the needs of Newcastle are not best served by the application of a cumulative growth rate across all Level 6 settlements, as currently proposed as part of the Core Strategy. The proposed housing target of 206 new residential units for the period 2025-2031 is to be accommodated across six



separate Level 6 settlements. However, the Variation does not provide clarity as to how this target is to be apportioned between individual settlements, including Newcastle.

The cumulative approach lacks transparency and fails to provide settlement-specific clarity, which is fundamental to effective development management and long-term planning. Newcastle has distinct characteristics, development pressures, and service needs that differ from the other five Level 6 settlements within the County. Treating growth as a shared or cumulative allowance across Level 6 settlements risks obscuring these needs and undermines the ability to plan positively and proactively for the future of the settlement. In the absence of a defined, settlement-specific growth allocation, there is a lack of certainty for landowners, developers and the local community, which is contrary to the objectives of proper planning and sustainable development.

Of particular concern is the potential for unintended and unreasonable development management outcomes arising from the cumulative approach. In practical terms, it appears possible that a future planning application in Newcastle could be refused or constrained on the basis that housing growth has already occurred in another Level 6 settlement, such as Donard. Such an outcome would be unreasonable and unsound from a planning perspective, as it would result in Newcastle being adversely affected by development patterns elsewhere, rather than being assessed on its own merits, capacity and needs. Each settlement should be evaluated individually, with due regard to its role, infrastructure capacity and potential for sustainable growth, rather than being subject to an aggregated ceiling that does not adequately reflect local circumstances.

We further question the rationale for the application of a 20% growth rate to Level 6 settlements, as opposed to a growth rate in excess of 30%. The statement that “*the towns in Level 6 are not considered to have capacity to grow at a rate in excess of 30%; a cumulative growth rate of 20% is deemed appropriate*,” lacks sufficient explanation or supporting evidence. In the absence of a clear and robust justification, this lower growth threshold appears overly restrictive and may not adequately reflect local housing need or the capacity of certain settlements, including Newcastle, to accommodate sustainable growth. A more flexible, settlement-specific approach would better support the delivery of housing, services and community infrastructure in a manner consistent with national and regional policy objectives. It is considered that the Planning Authority should be much more ambitious and aim for a growth rate in excess of 30% across the entire County.

Based on the housing growth projection figures provided, it is indicated that approximately 5 ha of land would be required to accommodate the new 206 housing units across all Level 6 settlements, resulting in an average density of approx. 40 dph. Notwithstanding this, the Planning Authority’s revised density standards intended to align with the Sustainable Residential Development and Compact Settlements Guidelines state that residential density should respond positively to the scale, form and character of individual small town centres and densities of 25-40 dph are identified as appropriate at the edges of small towns. Should development in the Level 6 settlements proceed at the lower end of this density range, having due regard to local character and context, it follows that a greater quantum of zoned residential land would be required to meet the projected housing demand.

Our client has consulted with various members across the community in Newcastle and these discussions have highlighted significant deficiencies in amenities and infrastructure even in the context of a Level 6 settlement. There is a strong consensus locally, that Newcastle needs a clear, long-term plan for its future development. This will require housing delivery potential in the village to be ring fenced to ensure that when an upgrade to the treatment plant is completed, that development can proceed without the concern that Donard or other Level 6 Settlements have already used up the allocations. In addition, the allowance of a growth rate in excess of 30% for a Village like Newcastle will assist in driving private investment of critical service and amenity infrastructure delivery.

In conclusion, while we support the overarching objectives of Proposed Variation No. 6 and the alignment of the Core Strategy with national policy, we respectfully request that the Planning Authority reconsider the cumulative approach to growth for Level 6 settlements, provide greater settlement-specific clarity for Newcastle, and clarify the basis for the growth rate applied. We consider these matters to be essential in ensuring that Newcastle can develop in a sustainable, coherent and plan-led manner over the lifetime of the Plan.





We respectfully request that the matters raised in this submission be taken into account in the preparation of the Chief Executive's Report and in any subsequent decision regarding the adoption of Proposed Variation No. 6.

We confirm that we act on behalf of Ardale Property Group, and request that all future correspondence in relation to this matter be directed to this office.

Yours sincerely,

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