



# LPF Variation No.6

Who are you:	Private Individual
Name:	Eileen and Roy Byrne
Reference:	VAR6-090700
Submission Made	January 8, 2026 9:08 AM

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:

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - has been appointed by Roy and Eileen Byrne of [REDACTED] to make this submission on their behalf to Wicklow County Council for consideration as part of the advertised (see Appendix 1) proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 and the advertised 'Call for Sites'. This submission pertains to lands owned by our client at Ballybeg, Rathnew, Co. Wicklow. Please find a copy of this submission attached in PDF. Best wishes, Brendan Buck MIPI.

**Upload a File (optional)**

BPS Submission to Wicklow County Council - for Roy & Eileen Byrne - 8.1.2026.pdf,  
5.22MB



**Planning & Development  
Consultants**

**M** 087 261 5871  
**T** 01 539 4960  
**E** info@bpsplanning.ie  
**W** www.bpsplanning.ie

PO Box 13658  
Dublin 14

**SUBMITTED VIA THE WCC CONSULTATION PORTAL<sup>1</sup>**

Variation No. 6 & 'Call for Sites' Consultations,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96.

8 January 2026

Dear Sir/Madam,

***Submissions to Proposed Variation No. 6 of the Wicklow County Development Plan 2022 – 2028 & the advertised 'Call for Sites'. Submissions request the re-zoning to 'Residential' of lands at Ballybeg, Rathnew, Co. Wicklow.***

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - has been appointed by Roy and Eileen Byrne of [REDACTED] [hereafter "client"] to make this submission on their behalf to Wicklow County Council [hereafter "WCC"] for consideration as part of advertised (see Appendix 1) proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 and the advertised 'Call for Sites'.

This submission pertains to lands owned<sup>2</sup> by our client at Ballybeg, Rathnew, Co. Wicklow.

WCC has issued two consultations to which our client wishes to respond. A single report is attached which responds to both.

These submissions are lodged prior to the issued deadlines of:

- 5pm on 16 January 2026; and
- 5pm on 2 of February 2026.

We trust this is in order.

If you require any further details, please contact BPS using the details supplied on this letterhead.

With best wishes,

*Brendan Buck*

**Brendan Buck MIFI  
Managing Director  
BPS Planning & Development Consultants LTD**

*Encl:* Submission report.

<sup>1</sup> <https://consult.wicklow.ie/en/user/password?current=homepage>

<sup>2</sup> We confirm that our owns the lands described below and which are the subject of this submission. Documentary proof of this can be provided on request.

---

Submissions to Proposed Variation No. 6 of the Wicklow County Development Plan 2022 – 2028 & the advertised 'Call for Sites'. Submissions request the re-zoning to 'Residential' of lands at Ballybeg, Rathnew, Co. Wicklow in the context of Variation No. 6.

Submission produced for and on behalf of  
Roy and Eileen Byrne of [REDACTED]  
[REDACTED]

# Document Control Sheet

Project	Submissions to Wicklow County Council in respect of Variation No. 6 of the County Development Plan and the advertised 'Call for Sites'.
Project No.	2026-101.
Document title	Development Plan Submission

Contents	No. of pages
Cover page	1
Control sheet	1
Table of contents	1
Text	19
Total No. of Pages	22

Rev.	Distribution	Author	Checked	Approved	Day	Month	Year
1	Client	BB	FB	EB	2	1	2026
2	Wicklow County Council	BB	FB	EB	8	1	2026

**BPS Planning & Development Consultants LTD**

PO Box 13658, Dublin 14, D14RW01  
Tel: 01 539 4960 / 087-2615871  
Email: [info@bpsplanning.ie](mailto:info@bpsplanning.ie)  
Web: [www.bpsplanning.ie](http://www.bpsplanning.ie)

This document has been prepared for the exclusive use of our client and unless otherwise agreed in writing with BPS Planning & Development Consultants LTD, no other party may use, make use of, or rely on the contents of this document. The document has been compiled using the resources agreed with the Client, and in accordance with the agreed scope of work. BPS Planning & Development Consultants LTD accepts no responsibility or liability for any use that is made of this document other than for the purposes for which it was originally commissioned and prepared, including by any third party, or use by others, of opinions or data contained in this document. BPS Planning & Development Consultants LTD accepts no liability for any documents or information supplied by others contained or referenced in this document. It is expressly stated that no independent verification of any documents or information supplied by others for this document has been made. BPS Planning & Development Consultants LTD has used reasonable skill, care, and diligence in compiling this document. It should be noted that no changes of whatsoever nature are to be made to any wording, information or details set out or contained in any BPS document unless the express consent has been obtained in advance, in writing, from BPS.

**Date: 8 January 2026**

# Contents

## **1.0 Introduction**

## **2.0 Purpose of these submissions**

- 2.1 Purpose of this submission as regards Variation No. 6
- 2.2 Purpose of this submission as regards the issued 'Call for Sites'

## **3.0 Location & description of the subject lands**

## **4.0 Relevant existing planning designations, etc:**

- 4.1 Lands are located within the landscape characterised as 'Corridor Area 4(a)'
- 4.2 Lands contain a national monument uncovered by the N11/M11 works

## **5.0 Land use zoning history of these lands**

## **6.0 Grounds for the subject lands adding to WCC's supply of housing lands**

### **6.1 Addressing the criteria issued by WCC under its 'Call for Sites' advertisement**

- 6.1.1 Are likely to contribute to the delivery of housing in the period up to 2040
- 6.1.2 The lands are located in areas where a level of housing demand exists
- 6.1.3 Would support the development of infill housing, housing on brownfield land
- 6.1.4 These lands can be serviced
  - 6.1.4.1 Road access is available
  - 6.1.4.2 Pedestrian access is available via new pedestrian paths under reg. ref. 2460756
  - 6.1.4.3 Public transport is available at Rathnew and in Wicklow Town
  - 6.1.4.4 The lands are located in an area with good social infrastructure
- 6.1.5 Zoning these lands would provide certainty as regards sequential development
- 6.1.6 No impacts would arise from the future development of these lands
- 6.1.7 No significant legal, topographical or environmental / heritage impediments to development
- 6.1.7.1 No impacts on adjoining properties
- 6.1.7.2 No visual impact concerns arise

## **7.0 Conclusion & recommendation**

### **Appendix 1: Consultation advertisements issued by Wicklow County Council**

## 1.0 Introduction

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - has been appointed by Roy and Eileen Byrne of [REDACTED] [hereafter "client"] to make this submission on their behalf to Wicklow County Council [hereafter "WCC"] for consideration as part of the advertised (see Appendix 1) proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 and the advertised 'Call for Sites' (see also Appendix 1).

This submission pertains to lands owned<sup>1</sup> by our client at Ballybeg, Rathnew, Co. Wicklow.

WCC has issued two consultations to which our client wishes to respond:

- ***Variation No. 6***

A consultation in respect of proposed Variation No. 6 which has been the subject of a Notice issued pursuant to Section 13 of the Planning and Development Act 2000 (as amended).

We understand WCC intends to revise the Wicklow Core Strategy and associated housing targets, and a number of related housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement. This is to take account of 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025).

You have invited submissions on the proposed revised Wicklow Core Strategy and associated housing targets, and the proposed revised housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement.

The deadline for written submissions is 5pm (17:00) on 16 January 2026. This submission is made via the online consultation portal at [www.wicklow.ie](http://www.wicklow.ie). The submission is clearly marked with 'Proposed Variation No. 6'. This submission includes our client's name and a contact address and those of BPS as 'agent' and a map and other details as set out in this report.

We acknowledge that this proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow and does not relate to the potential zoning of new lands for residential development. However, our client considers it necessary to comment on the Variation to set the context for their submission pertaining to your 'Call for Sites'. We are therefore submitting this report to WCC in respect of both consultations.

- ***'Call for Sites'***

As noted above, WCC has issued two consultations, the second is a 'Call for Sites' for "Land Suitable for Residential Development". This is a Non-Statutory Consultation which responds to the new Ministerial Guidelines on NPF Implementation: Housing Growth Requirements which were published on the 29 July 2025 on [www.gov.ie](http://www.gov.ie) with the aim of updating development plans to reflect the requirements of the Revised National Planning Framework (NPF) and achieving a significant acceleration in housing delivery. The Guidelines provide for an increased annual housing growth requirement for Wicklow County Council, and an 'additional provision' mechanism to support the zoning of additional lands in areas where it can be justified.

This submission identifies lands owned by our client which they ask to be considered for zoning for new housing development. These lands could meet the objectives of the Guidelines in terms of contributing to the acceleration of housing delivery over the next 15 years.

The consultation is now also open with a deadline of 2 of February 2026. This submission is made via the online consultation portal.

This submission includes a completed 'Call for Sites Questionnaire' form. We have completed Part 1 and Part 2 of the 'Call for Sites' submission process.

We trust that this joint submission made to both consultations adequately represents our client's position as regards the matters raised by WCC. They ask that the Core Strategy and associated housing targets be revised to increase lands zoned for housing at Ballybeg, Rathnew and that the subject lands be considered for re-zoning as residential

---

<sup>1</sup> We confirm that our owns the lands described below and which are the subject of this submission. Documentary proof of this can be provided on request.

## 2.0 Purpose of these submissions

### 2.1 Purpose of this submission as regards Variation No. 6

Our client considers that there is a need to increase the quantum of residentially zoned lands at Ballybeg, Rathnew, Co. Wicklow under Variation No. 6. WCC is asked to consider:

- Revising the Wicklow Core Strategy and associated housing targets, and housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement to take account of 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025).

As Section 3.1 of Chapter 3 'Proposed Variation' confirms, WCC's existing housing supply targets are far below 'NPF Implementation: Housing Growth Requirements':

- ❖ The new housing target for the period Q1 2025-Q2 2028 is 7,238 units.
- ❖ The new housing target for the period Q1 2025 – Q4 2031 is 14,476 units.
- ❖ The new housing target for the period Q1 2025 – Q4 2040 is 26,266 units.

These targets must be reflected in the CDP and it is a policy and objective of the new Guidelines that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 [of the guidelines] is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

Section 3.34 'Population & Housing Allocations' of Chapter 3 'Proposed Variation' states: "The new housing targets are taken as a minimum levels of housing to be supported by zoning / development objectives in the 2025-2031 period".

**Table 3.1 Housing Targets for County Wicklow 2025-2040**

Year	Target	Cumulative total
2025	2,068	2,068
2026	2,068	4,136
2027	2,068	6,204
Q1+Q2 2028	1,034	<b>7,238</b>
Q3+Q4 2028	1,034	8,272
2029	2,068	10,340
2030	2,068	12,408
2031	2,068	<b>14,476</b>
2032	2,068	16,544
2033	2,068	18,612
2034	2,068	20,680
2035	931	21,611
2036	931	22,542
2037	931	23,473
2038	931	24,404
2039	931	25,335
2040	931	<b>26,266</b>

The new housing target for the period Q1 2025-Q2 2028 is **7,238 units**.

The new housing target for the period Q1 2025 – Q4 2031 is **14,476 units**.

The new housing target for the period Q1 2025 – Q4 2040 is **26,266 units**.

*Fig. 1: Housing Targets for County Wicklow 2025-2040 (Source: Table 3.1 of Chapter 3 'Proposed Variation')*

- Amending the Wicklow Town - Rathnew Local Area Plan 2025 – 2031 to provide for sufficient housing supply within Wicklow Town and Rathnew as required by the new guidelines. This aligns with each of the amended National Policy Objectives set out in Fig. 2.

<b>NPO11</b>	<i>Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.</i>
<b>NPO17</b>	<i>In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework<sup>6</sup>, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:</i> <ul style="list-style-type: none"> <li>▪ <i>Agreement (regional assembly, metropolitan area and/or local authority as appropriate);</i></li> <li>▪ <i>Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and</i></li> <li>▪ <i>A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.</i></li> </ul>
<b>NPO42</b>	<i>To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.</i>
<b>NPO43</b>	<i>Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.</i>
<b>NPO92</b>	<i>Ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.</i>
<b>NPO97</b>	<i>The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.</i>
<b>NPO101</b>	<i>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.</i>
<b>NPO103</b>	<i>When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.</i>

Fig. 2: Revised NPOs of the Revised NPF

- Revising the boundary of the Wicklow Town - Rathnew Local Area Plan 2025 – 2031 so as to allow well serviced lands adjoining that boundary to be included in the Core Strategy's housing targets. This is in line with Table 3.3 'Targeted Settlement Growth 2022-2031' of Chapter 3 'Proposed Variation'.

Having regard these new housing growth objectives, WCC has undertaken a review of existing zoned lands in the towns in Levels 1-6 of the Settlement Hierarchy (the location of 'zoned lands') to cater for the Housing Growth Requirements figures has been undertaken in Q3 2025 and is shown in Figs. 3 and 4.

WCC states:

*Taking into account: the number of units under construction as of Q3 2025 (c. 2,800); the number of units for which permission has been granted but as yet to commence (c. 2,800 units) and the capacity of the land occupied by these permissions in the event that these developments do not proceed; the capacity of zoned and serviced / serviceable (by 2031) lands without permission (c. 16,000 - 20,000 units); there is capacity for the development of c. 21,500 – 25,500 units under the provisions of this County Development Plan and existing local plans as of Q3 2025.*

***This quantum of zoned land would not be sufficient to meet the longer term housing target requirements up to 2040 as set out in the Guidelines (as detailed in Table 3.1).***

In order to support the immediate term delivery of housing on said zoned lands, WCC sets out how 3 no. objectives will apply. These objectives pertain to housing delivery on existing zoned lands or lands with planning permission.

Table 3.3: Targeted Settlement Growth 2022-2031

Level	Town	Housing Stock 2022	Housing Growth 2022-2031	RATIONALE
2	Wicklow - Rathnew	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).

Fig. 3: Table 3.3 'Targeted Settlement Growth 2022-2031' of Chapter 3 'Proposed Variation'.

Table 3.4 Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)

Level	Town	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Zoned land with no live permission <sup>2</sup> (ha)	Estimated capacity of zoned land with no live permission (units)	Of which, subject to 'Phase 1/Priority 1' designation or no phasing designation	Of which, subject to 'Phase 2/Priority 2' designation <sup>3</sup>	Estimated capacity of zoned and currently fully serviced <sup>4</sup> land with no live permission (units)	Estimated capacity of zoned and serviceable <sup>5</sup> land with no live permission (units)
1	Bray	157	575	135	101	7,405	7,405	0	7,405	7,405
2	Wicklow - Rathnew	502	639	0	59	2,916	1,779	1,137	2,916	2,916

Fig. 4: Table 3.4 'Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)'

- Achieving compliance with the National Planning Framework's First Revision (April 2025) by setting out new housing growth requirements (see pages 7 and 8 of Chapter 1 'Proposed Variation'<sup>2</sup>. Our client respectfully submits that additional lands need to be zoned to achieve the required future housing capacity in Wicklow and at Rathnew/Wicklow.

Table 3.5 WICKLOW CORE STRATEGY  
Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-6<sup>13</sup>)

Level	Town	New housing target 2025-2031 <sup>14</sup> (units)	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Further growth required up to 2031 (units)	Amount of zoned land required to accommodate further growth up to 2031 (ha)	Amount of zoned and serviced land available up to 2031 (ha)
1	Bray	5,526	157	575	135	4,659	62	101
2	Wicklow - Rathnew	3,170	502	639	0	2,029	41	59

Fig. 5: Table 3.5 'WICKLOW CORE STRATEGY Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-6<sup>13</sup>)'

- The subject lands can contribute to a sustainable pattern of residential development at Ballybeg within this part of Rathnew. National Policy Objectives 68 of the NPF states:

*A Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to:*

- ✓ *any relocated growth being in the form of compact development, such as infill or a sustainable urban extension;*
- ✓ *any relocated growth being served by high capacity public transport and/or related to significant employment provision; and*
- ✓ *National Policy Objective 9, as set out in Chapter 4* (emphasis added).

Our client submits that the proposed amendments set out in Variation No. 6 point to a need to look beyond existing zoned lands and existing permissions to consider new lands for residential development. Section 2.2. of this report points to how lands at Ballybeg, which are on the eastern boundary of the Wicklow Town - Rathnew Local Area Plan 2025 – 2031, could be seamlessly added to the supply of residentially zoned lands in County Wicklow and available to the Rathnew and Wicklow Town areas.

## 2.2 Purpose of this submission as regards the issued 'Call for Sites'

Our client appreciates WCC's 'Call for Sites'. They own lands at Ballybeg, with an area of 8.0937ha., which are on the western boundary of the Wicklow Town - Rathnew Local Area Plan 2025 – 2031, could be seamlessly added to the supply of residentially zoned lands in County Wicklow and available to the Rathnew and Wicklow Town areas.

They are seeking to achieve the future sustainable use of these lands that is compatible with the expanding and rapidly developing adjoining area of Rathnew. These lands have previously been zoned commercial; however, they are presently unzoned.

The subject lands, illustrated in Figs. 6, are near the N11/M11, they are connected to the Wicklow Town - Rathnew Local Area Plan 2025 – 2031 via an underpass under the road and there are several houses in the immediate vicinity. The lands have become less and less suitable over time for agriculture use. During the construction of the N11/M11 these lands were used for construction storage, etc.

There is a need to decide on a possible future use for these lands over the coming years. The lands would be suitable for the development of a residential estate.

<sup>2</sup>

[https://www.wicklow.ie/Portals/0/adam/Documents/6dLZayN3sUOCGPsWLaNZgg/Link/Chapter%201%20Introduction%20&%20Strateg ic%20Context\\_Proposed%20VAR6.pdf](https://www.wicklow.ie/Portals/0/adam/Documents/6dLZayN3sUOCGPsWLaNZgg/Link/Chapter%201%20Introduction%20&%20Strateg ic%20Context_Proposed%20VAR6.pdf)

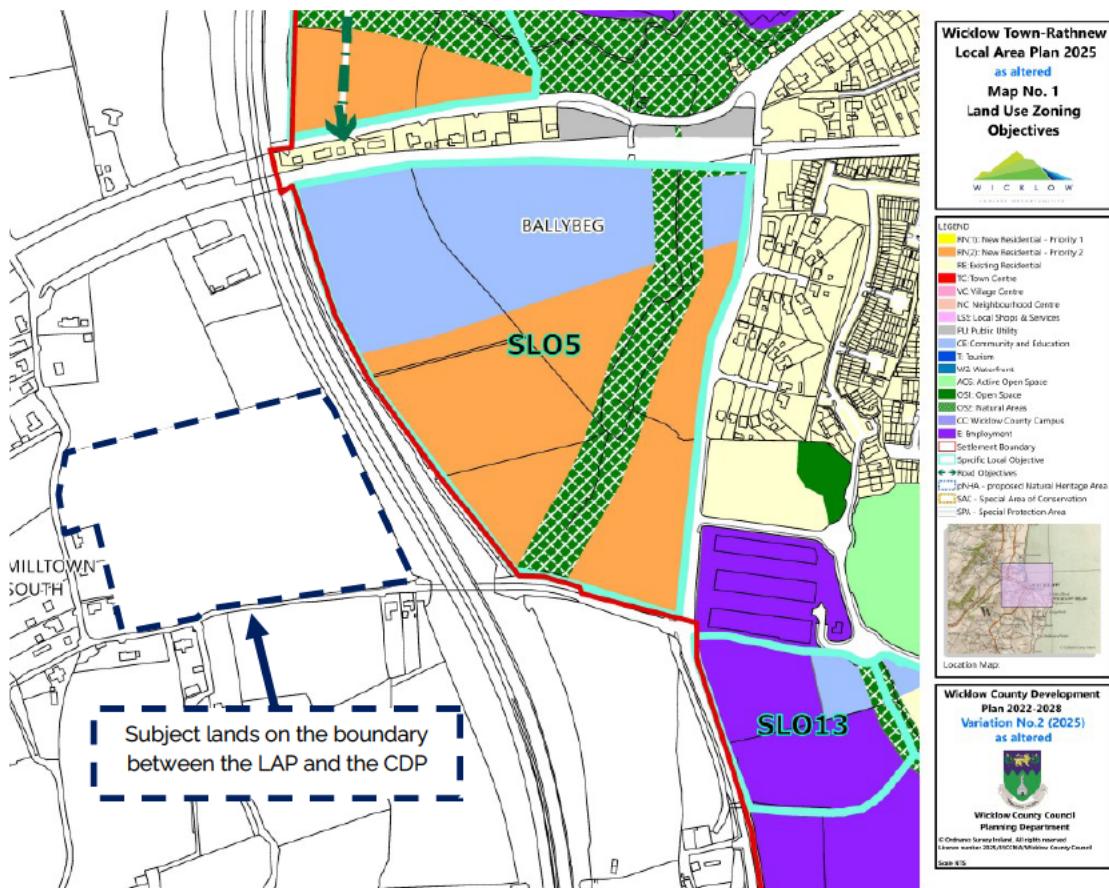


Fig. 6: The location of the lands relative to the boundary of the Wicklow-Rathnew Local Area Plan 2025

### 3.0 Location & description of the subject lands

The subject lands, with an area of 8.0937ha., are located 1.4km from the centre of Rathnew and are accessible by way of an underpass from the R772 onto Milltown Lane. Figs. 7 to 10 illustrate the siting, appearance, and accessibility of these lands to Rathnew.

Despite having been zoned previously, these lands remain undeveloped and in agricultural use. There is a significant drop in ground level from the N11/M11 to these lands, while the lands themselves are sloping in nature. There are several existing residential dwellings located in the immediate vicinity of these lands.

The lands located to the east (under the underpass) are zoned 'RN2' - 'New Residential – Priority 2'. The subject lands would essentially form an extension of those existing zoned lands (albeit with the N11/M11 in between).

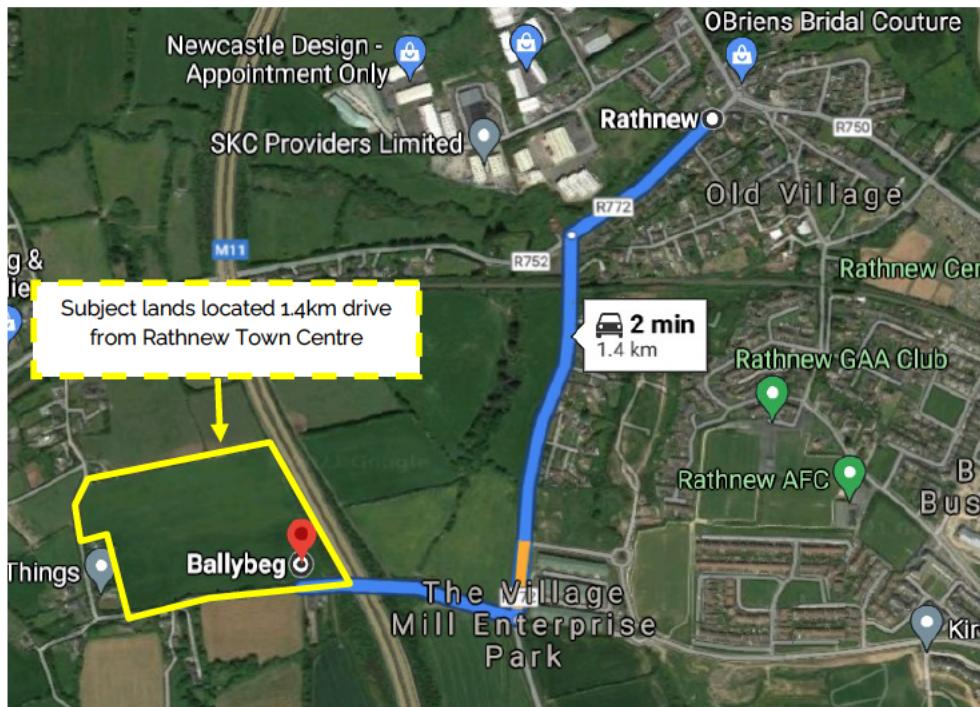


Fig. 7: Distance of client lands from the centre of Rathnew – as per Google Maps



Fig. 8: Milltown Lane underpass – passing under the N11/M11



Fig. 9: View of client lands from the N11/M11 – lands north of Milltown Lane (in view)



Fig. 10: Aerial view of client lands relative to Rathnew (Google Earth)

#### 4.0 Relevant existing planning designations, etc:

##### 4.1 Lands are located within the landscape characterised as 'Corridor Area 4(a)':

Chapter 17 of the WCC CDP 2022-2028 refers to 'NATURAL HERITAGE & BIODIVERSITY'. The chapter places the subject lands in 'Corridor Area 4(a) - The N11 Corridor':

*This area covers the main access corridor area along the east of the County. The boundary of the eastern access corridor generally follows what is considered to be the areas upon which the greatest influence is exerted by this primary access route. This route, for the most part, runs through the more low lying and accessible tracts of land, dissects the Glen of the Downs wood in the north of the County and provides expansive coastal views north of Wicklow Town. This landscape area acts as the main connection between the major towns along the east coast of the County.*

The CDP makes it clear how the "Vulnerability" of the Corridor area is "Medium".

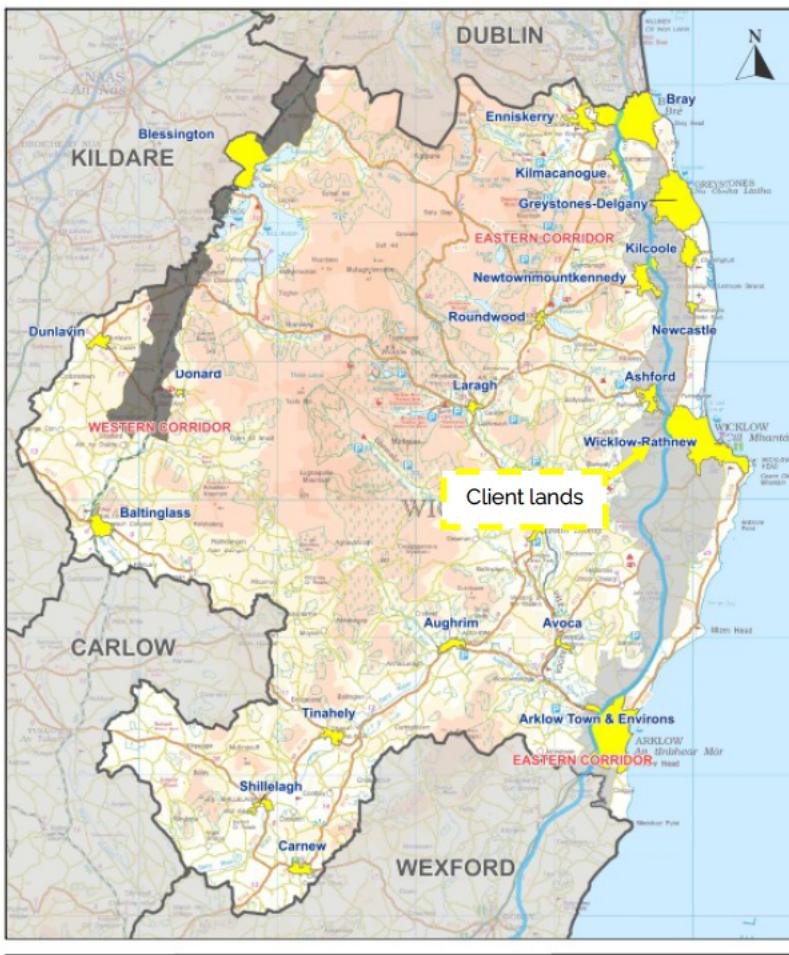


Fig. 11: The subject lands are located within the 'Corridor Area East'

#### 4.2 Lands contain a national monument uncovered by the N11/M11 works:

The subject lands contain a national monument, ref. Wl02882, which refers to Excavation Licence No. 04E0039. The Draft WCC CDP 2021-2027 stated:

*This licence was issued in respect of features exposed during a monitored topsoil-strip over the area of a borrow pit adjacent to the route of the N11 Ashford-Rathnew bypass. Agreement was reached between the developer and the National Monuments Service that these features could be preserved in situ, covered with geotextile and sand prior to the total reinstatement of the field, having been lightly cleaned, planned and recorded. The features, in the main, would appear to represent aspects of a severely truncated prehistoric landscape. The most substantial remains are the traces of a subcircular foundation trench, 4.9m by 5m in diameter. The trench is likely to be quite shallow, given the level of truncation over this area as a result of deep ploughing. This feature would appear to represent the remains of a small, prehistoric house. The other features are far more ephemeral in nature, being largely small, amorphous spreads and deposits and occasional areas of localised burning. The absence of any diagnostic material from the site renders it difficult to date the activity (Bennett 2007, 475-6).*

This national monument represents a small portion of this entire land area and, as with the N11/M11 100m setback requirement applied generally along the road corridor, a setback boundary could be placed around the National Monument in the event these lands were developed.

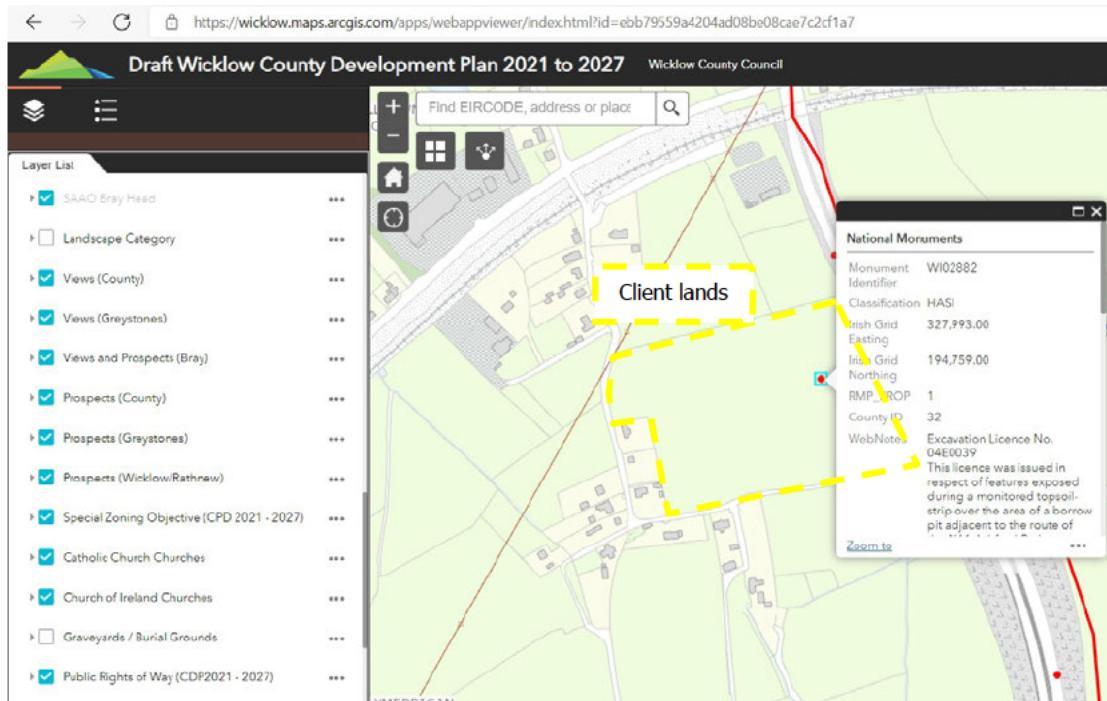


Fig. 12: The subject lands contain a national monument

## 5.0 Land use zoning history of these lands

In drafting and adopting the 2004-2010 WCC CDP, 10 acres of our client's lands were zoned for commercial use. It was made clear that: "Any development would be the subject of an EIS and shall be setback 100m from the N11 in accordance with CDP policy on building lines".

These lands were not developed in the lifetime of the 2004-2010 CDP because lands to the east, now located outside the Wicklow Town - Rathnew Local Area Plan 2025 – 2031 were not developed along a timescale that had been predicted in 2004.

There have subsequently been several planning applications made on lands to the east and the opportunity once again arises to consider zoning our client's lands in a manner that is compatible with and supports the development of lands to the east.

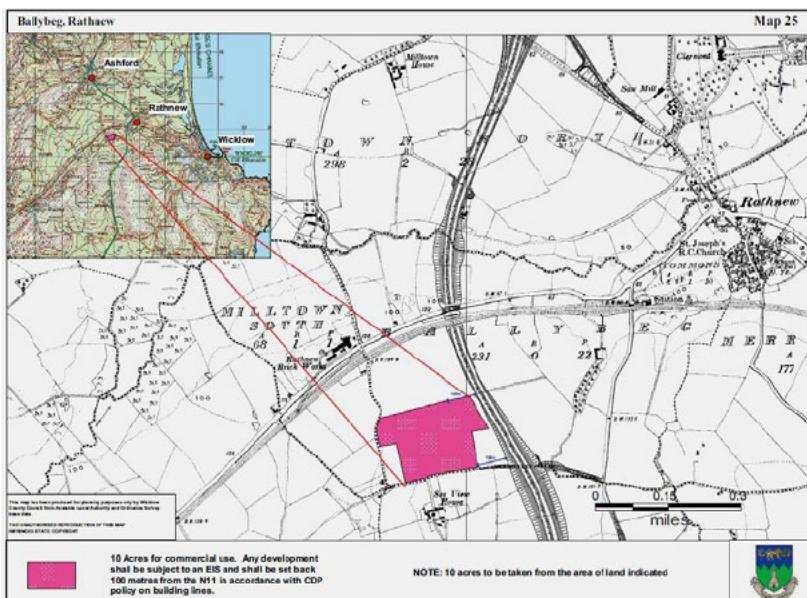


Fig. 13: Subject lands as zoned under the 2004-2010 WCC County Development Plan

## 6.0 Grounds for the subject lands adding to WCC's supply of housing lands

Our client maintains that there are several grounds for considering these lands suitable for inclusion in WCC's amended housing supply calculations as set out in the, to be amended, Wicklow Core Strategy's Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-613).

We note how the starting point for this submission is recommending that more lands be zoned for residential development at Ballybeg.

The future re-zoning of these lands to contribute to Wicklow's housing supply targets would be welcomed as a sustainable land use for these lands into the future. These lands have, due to their siting closely adjoining the N11/M11 corridor and Rathnew, become less and less suitable for agricultural use.

The lands have previously been zoned 'Commercial' under the WCC CDP 2004-2010 on the basis that they would be developed in a compatible manner with similarly zoned lands to the east. Those lands are now zoned 'RN2' - 'New Residential – Priority 2' under the LAP. If re-zoned, the subject lands would essentially form an extension of those existing zoned lands (albeit with the N11/M11 in between).

Milltown Lane and the existing underpass offers a direct connection between the zoned lands to the east and our client's lands. This is why our client's land is suitable, and no other parcels of land located to the west of the N11/M11 corridor are suitable, for development (as recognised by WCC in its 2004 zoning of these lands).

The CDP makes it clear how the "Vulnerability" of the Eastern Corridor is "Medium" (see Section xx of this report). The proposed re-zoning which would provide for residential development on these lands in a manner compatible with the emerging form and pattern of development of the built environment to the east, would not unduly impact on the Eastern Corridor. Any such development would be read visually as part of Rathnew.

Regarding the national monument on these lands, we note how it represents a small portion of this entire land area and, as with the N11/M11 100m setback requirement applied generally along the road corridor, a setback boundary could be placed around the National Monument in the even these lands were developed.

Our client submits that these lands could be re-zoned to permit residential development without causing any undue environmental, landscape or heritage impacts, and the benefit of the re-zoning is that these lands could connect to and contribute to the development of the existing, zoned, lands to the east.

### 6.1 Addressing the criteria issued by WCC under its 'Call for Sites' advertisement

#### 6.1.1 Are likely to contribute to the delivery of housing in the period up to 2040

If re-zoned, these lands would contribute to the delivery of housing in the period up to 2040. There has been very little house building in Ballybeg in recent years with lands to the east (across the M11/N11) the subject of a recent planning application reg. ref. 2460756, for:

*... development comprising total of 15,717 square metres of light industrial and warehouse floorspace, to include ancillary office floorspace, plus a creche (271 sq. m), a cafe (175 sq. m) and 1,037 sq. metres of office floorspace and 88 dwellings – 15no. 4 bedroom, 53 no. 3 bedroom and 20no.1 and 2 bedroom. The development includes on site car and bicycle parking, the provision of services, landscaping proposals (including SUDS), provision of roads, ancillary site development works and a new vehicular entrance to the R772. All on a site of 7.45 hectares*

This planning application obtained conditional permission on 7/7/2025. Figs. 14 and 15 illustrate the scale and extent of this development.

We submit that our client's lands would allow a natural extension of this development. Given the scale of this scheme, to be constructed at a time when WCC states – in Variation No. 6 – that it will be an objective to proactively work with developers to deliver housing, it would appear to in accordance with the proper planning and sustainable development of this area to re-zone these lands. Our client is open to proactively working with WCC to contribute to housing supply at this location at the earliest opportunity.



Fig. 14: Mixed use & residential development to the east granted planning permission under reg. ref. 2460756 (1)



Fig. 15: Mixed use & residential development to the east granted planning permission under reg. ref. 2460756 (2)

### 6.1.2 The lands are located in areas where a level of housing demand exists

These lands are located in areas where a level of housing demand exists. Pressure for housing in Rathnew and Wicklow Town is acute. The housing development which forms part of planning permission reg. ref. 2460756 will quickly sell.

In making this submission, our client has regard to the County Development Plan and to development and emerging housing supply growth objectives, including the amount of zoned housing land and phasing / prioritising objectives anticipated for County Wicklow, Wicklow Town, and Rathnew (see Section xx of this report).

This submission has considered also the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning PART A - iii Authorities' (DoHLGH 2022) and the 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025).

We submit that the proposed residential zoning included in this submission are on the basis of providing enough housing land to address the new housing supply requirements set out in Variation No. 6.

the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP, with flexibility in the zoning provisions to ensure that: (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise, and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

This submission adheres to the compact growth, sequential development and phasing principles set out in the existing CDP and LAP while having regard to Variation No. 6.

#### 6.1.3 Would support the development of infill housing, housing on brownfield land

The zoning of these lands would support the development of infill housing as the context for these lands is characterised by single houses and the emerging development permitted under planning permission ref. 2460756.

#### 6.1.4 These lands can be serviced

There would not appear to be any infrastructural constraints which would prevent the zoning of these lands for development. A residential development can be served by road, mains water, surface water, foul water and electricity infrastructure. This is confirmed by the Mixed use and residential development to the east granted planning permission under reg. ref. 2460756.

##### 6.1.4.1 Road access is available

The evolving distributor road network in this area has already been determined by existing developments and planning permissions.

These lands can be accessed via Milltown Lane which connects to the R772 which connects into Rathnew Village and into the N11/M11 (see Fig. 16).



Fig. 16: Road access from onto Milltown Lane connecting to Rathnew and the N11/M11 (Source: Google Earth)



*Fig. 17: Road access via Milltown Lane underpass connecting to Rathnew and the N11/M11 with footpaths on either side of the road – east side of the underpass*



*Fig. 18: Road access via Milltown Lane underpass connecting to Rathnew and the N11/M11 with footpaths on either side of the road – west side of the underpass*

#### 6.1.4.2 Pedestrian access is available via new pedestrian paths under reg. ref. 2460756

It is submitted that the subject lands can be accessed in a manner which would be in keeping with the proper planning and sustainable development of this area of Rathnew. As Figs. 17 to 19 show, the N11/M11 underpass maintains guarded and handrailed footpaths on either side of the road. The subject lands extend up to the underpass. The recent permission reg. ref. 2460756, on the east side of the underpass, will provide footpaths onto Milltown Lane and passing into Rathnew's existing pedestrian network. A residential development of the subject lands would, visually and practically, represent an extension of the permitted scheme to the east.



*Fig. 19: Pedestrian access via Milltown Lane underpass connecting to Rathnew and the N11/M11 with footpaths on either side of the road – west side of the underpass*

#### 6.1.4.3 Public transport is available at Rathnew and in Wicklow Town

The site is located where there are good public transport services including bus services and access to mainline rail in Wicklow Town.

#### 6.1.4.4 The lands are located in an area with good social infrastructure

The lands are located adjoining Rathnew and Wicklow Town which each have good social infrastructure with capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure. The WCC decision under recent permission reg. ref. 2460756 confirmed this to be the case.

#### 6.1.5 Zoning these lands would provide certainty as regards sequential development

Zoning gives a degree of certainty to residents, developers, etc. Variation No. 6 and the 'Call for Sites' consultation process needs to provide landowners and developers in the town with a clear idea of the future shape of Rathnew and an understanding of exactly how new housing supply targets will be met. Our client suggests that the CDP and LAP be amended to add their lands.

The zoning of these lands would contribute to sustainable, compact and sequential patterns of growth.

The lands are more than 0.4 hectares (1 acre) in size and have capacity for 10 or more homes –

#### 6.1.6 No impacts would arise from the future development of these lands

The zoning of these lands would not appear to raise any impacts on any sensitive designations or on any adjoining properties.

These lands could be zoned without raising any objection. This would appear to provide a balance between the need for additional housing land and the need to prevent impacts.

## 6.1.7 No significant legal, topographical or environmental / heritage impediments to development

The subject lands are essentially zoned 'Corridor Area'. They can reasonably be called peri-urban. Beyond this general landscape designation, these lands are not within, or within the vicinity of, any of the following amenity, landscape, environmental or other designations:

1. Natural Heritage Area,
2. Special Area of Conservation,
3. Special Protection Area,
4. Protected Structure,
5. Architectural Conservation Area,
6. Preserved views or prospects,
7. Tree Preservation Orders, etc.

The lands are suitable for residential use as now sought as they would connect into the emerging development to the east and can offer quality public and communal open spaces. The subject lands can also offer a landscaped boundary to lands that would remain outside of the LAP boundary.

### 6.1.7.1 No impacts on adjoining properties

The zoning of these lands for housing would not impact on any adjoining properties and certainly no residential properties.

### 6.1.7.2 No visual impact concerns arise

The zoning of the subject lands for residential development would not have any discernible impact on the landscape, but would facilitate modern settlement and development needs.

## 7.0 Conclusion & recommendation

Arising from the above analysis, it is the professional opinion of BPS, as an accredited firm of town planning consultants, that:

- Variation No. 6 places WCC in a position where it needs to consider how to achieve significant increases in the supply of residentially zoned land. There is a need to proactively consider all possible lands.
- The 'Call for Sites' issued by WCC is made in the context of Variation No. 6. Our client offers their lands at Ballybeg, with an area of 8.0937ha., as suitable for re-zoning for residential development. These lands almost adjoin a large recent mixed use planning permission issued under reg. ref. 2460756. Critically, the lands:
  - ❖ Are likely to contribute to the delivery of housing in the period up to 2040.
  - ❖ Are located in areas where a level of housing demand exists.
  - ❖ Would support the development of infill housing, housing on brownfield land or address vacancy and dereliction.
  - ❖ Are serviced or have the potential to be serviced (i.e. have the ability connect to roads infrastructure and water, wastewater, surface water and electricity networks).
  - ❖ Are located in areas with good public transport services.
  - ❖ Are located in or adjoining towns or villages with good social infrastructure with capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure.
  - ❖ Can Contribute to sustainable, compact and sequential patterns of growth.
  - ❖ Are greater than 0.4 hectares (1 acre) or more in size and have the capacity for 10 or more homes.
  - ❖ Are not subject to any significant legal, topographical or environmental / heritage impediments to development coming forward.

The re-zoning of these lands would support WCC's new housing supply targets and help it to achieve the new objectives set out in the Revised NPF. The 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025) clearly require significant re-working of the County Development Plan and the Local Area Plan as regards

zoned housing land. This submission offers a previously zoned site as one which could be zoned to address the current national policy of increasing housing supply.

*Signed:*

*Brendan Buck*

**BPS Planning Consultants LTD**  
Members of the Irish Planning Institute  
8 January 2026

## Appendix 1: Consultation advertisements issued by Wicklow County Council

 **WICKLOW COUNTY COUNCIL**  
COMHAIRLE CHONTAE CHILL MHAINTÁIN

 **WICKLOW**  
LOCAL GOVERNMENT



**WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028**  
**PROPOSED VARIATION NO. 6**

Notice is hereby given pursuant to Section 13 of the Planning and Development Act 2000 (as amended) that Wicklow County Council, being the planning authority for the area, proposes to **VARY** the Wicklow County Development Plan 2022-2028 (as varied) in respect of the following:

**PROPOSED VARIATION NO. 6**  
To revise the Wicklow Core Strategy and associated housing targets, and a number of related housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement.

**REASON FOR PROPOSED VARIATION:**  
To take account of 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025).

**Submissions are hereby invited on the proposed revised Wicklow Core Strategy and associated housing targets, and the proposed revised housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement.**

A copy of the **Proposed Variation**, together with

- Strategic Environmental Assessment screening report and associated determination (pursuant to the European Strategic Environmental Assessment Directive (2001/42/EC and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (as amended)) and
- Appropriate Assessment screening report and associated determination (pursuant to the EU European Habitats Directive (92/43/EEC) and the Planning and Development Act 2000 (as amended),

will be available to view at the following locations, during their normal opening hours, from **Friday 05 December 2025 to Friday 16 January 2026** inclusive:

- Wicklow County Council, County Buildings, Station Road, Wicklow Town
- Copies of the variation are available to download and view on the Council's website [www.wicklow.ie](http://www.wicklow.ie) through an **online consultation portal**. Scan the QR code on this notice to access the portal.

**MAKING A SUBMISSION**

Submissions or observations regarding the Proposed Variation and the associated reports are hereby invited from the public and interested bodies. Children, or groups or associations representing the interests of children, are entitled to make submissions or observations. Written submissions or observations made before 5pm (17:00) **on 16 January 2026** will be taken into consideration before the making of the Proposed Variation.

Submissions may be made in one of the following ways:

- Write to 'Variation No.6, Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town.
- Through the **online consultation portal** at [www.wicklow.ie](http://www.wicklow.ie) or scan the QR code on this notice.

**SUBMISSIONS SHOULD NOT BE MADE BY EMAIL**

- All submissions are to be clearly marked with 'Proposed Variation No.6'.
- All submissions should include your name and a contact address, a map (where appropriate) and, where relevant, details of any organisation, community group or company etc., which you represent.
- Please make your submission by one medium only, i.e. hard copy or through the portal.
- All valid submissions will form a part of the statutory Chief Executive's report and will be available to view online. The planning process is an open and public one, therefore all submissions/observations are a matter of public record and will be available for public viewing; they may also be placed on the County Council's website and therefore should not include any personal information.
- LATE SUBMISSIONS WILL NOT BE ACCEPTED.**

**IMPORTANT NOTE**

This Proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow; in particular it does not relate to the potential zoning of new lands for residential development or the extension of settlement boundaries, but rather it relates primarily to revising the housing targets for various settlements / areas within County Wicklow as set out in the **Wicklow Core Strategy**.

Wicklow County Council will separately be commencing a 'Call For Sites' consultation seeking expressions of interest from landowners for the future potential zoning of land for residential use and / or the extension of settlement boundaries. If you are interested in seeking the zoning of land or the extension of settlement boundaries, please do not make your submission to 'Proposed Variation No. 6' but rather to the separate future 'Call for Sites'. This 'Call for Sites' will commence before the end of 2025 and will be publicised through normal media channels.

Wicklow County Council is committed to Access For All. All of the above documents are available in alternative format on request. Please contact Wicklow County Council on 0404-20100 should you have any specific access requirements.



**Comhairle Contae Chill Mhantáin**  
**Wicklow County Council**

**WICKLOW COUNTY COUNCIL**

**COMHAIRLE CHONTAE CHILL MHANTÁIN**

**CALL FOR SITES: LAND SUITABLE FOR RESIDENTIAL DEVELOPMENT**

**NON-STATUTORY CONSULTATION NOW OPEN**

New Ministerial Guidelines on *NPF Implementation: Housing Growth Requirements* were published on the 29 July 2025 on [www.gov.ie](http://www.gov.ie) with the aim of updating development plans to reflect the requirements of the Revised National Planning Framework (NPF) and achieving a significant acceleration in housing delivery. The Guidelines provide for an increased annual housing growth requirement for County Wicklow, and an 'additional provision' mechanism to support the zoning of additional lands in areas where it can be justified.

In response to these new Guidelines, Wicklow County Council is undertaking a non-statutory 'Call for Sites' consultation inviting 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.

Wicklow County Council is particularly seeking to identify lands/sites across the County that fulfil the following criteria:

- Are likely to contribute to the delivery of housing in the period up to 2040
- Are located in areas where a level of housing demand exists
- Would support the development of infill housing, housing on brownfield land or address vacancy and dereliction
- Are serviced or have the potential to be serviced (i.e. have the ability connect to roads infrastructure and water, wastewater, surface water and electricity networks)
- Are located in areas with good public transport services
- Are located in or adjoining towns or villages with good social infrastructure with capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure
- Contribute to sustainable, compact and sequential patterns of growth
- In the case of 'greenfield' lands are 0.4 hectares (1 acre) or more in size, or have capacity for 10 or more homes
- Have no significant legal, topographical or environmental / heritage impediments to development coming forward

This call for sites is a non-statutory consultation to identify sites for further assessment. Landowners should be aware that any lands zoned for residential use may be liable for the annual **Residential Zoned Land Tax**.

Details of the consultation can be found on the Council's website [www.wicklow.ie](http://www.wicklow.ie) and through the **online consultation portal**. Please scan the QR code on this notice to access the portal.

The portal can also be accessed at the Planning Counter computers at Wicklow County Council offices, Station Road, Wicklow Town, A67 FW96 during normal office hours.

Alternatively you can request a pdf or printed information pack be emailed / posted to you by calling 0404 20148 or emailing [callforsites@wicklowcoco.ie](mailto:callforsites@wicklowcoco.ie).

If you have any questions regarding the website or portal, or would like to request an information pack, please contact Wicklow County Council Planning Department on 0404 20148 or email [callforsites@wicklowcoco.ie](mailto:callforsites@wicklowcoco.ie). **In light of Wicklow County Council opening hours over Christmas 2025, please be advised that any such inquiries / requests will be attended to from 02 January 2026 onwards.**

#### MAKING A SUBMISSION

The consultation is now open and will run until 27 February 2026. Submissions made before 5pm (17:00) on Friday 27 February 2026 will be taken into consideration.

Submissions can be made in one of the following ways:

1. Through the online consultation portal – which can be accessed via at [www.wicklow.ie](http://www.wicklow.ie), or by scanning scan the QR code on this notice; or
2. Submit a hard copy completed 'Call for Sites' form to the Administrative Officer, Planning Section, Wicklow County Council, County Buildings, Station Road, Wicklow Town, A67 FW96.  
Copies of the 'Call for Sites' form can be obtained from Wicklow County Council offices or downloaded via the website. Forms can also be posted to you if needed – please contact the Planning Department on 0404 20148 or emailing [callforsites@wicklowcoco.ie](mailto:callforsites@wicklowcoco.ie).

In light of Wicklow County Council opening hours over Christmas 2025, please be advised that any such requests will be attended to from 02 January 2026 onwards.

#### PLEASE NOTE

- All submissions must be made in the format required - through the portal OR if submitting a hard copy by using the 'Call for Sites' form. No other format will be received – please do not email forms, or submit any other documentation.
- Each individual site should be subject to its own submission.
- The planning process is an open and public one, therefore all submissions/observations are a matter of public record and will be available for public viewing; they may also be placed on the County Council's website and therefore should not include any personal information.
- This is a 'Call for Sites' for suggestions of lands that could be considered for future zoning for housing development. The land owner is responsible for activating the site for delivery of housing. This is not a call for sites for Wicklow County Council to purchase.
- YOU ARE STRONGLY ADVISED TO MAKE YOUR SUBMISSION AS EARLY AS POSSIBLE LATE SUBMISSIONS WILL NOT BE ACCEPTED



*Wicklow County Council is committed to Access for All. Please contact Wicklow County Council on 0404-20100 should you have a specific access requirements.*