



Variation No.6

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Proposed Variation No. 6 of Wicklow County Development Plan 2022-2028 in respect of Core Strategy, Associated Housing Targets and Related Housing Objectives

Submission on Proposed Variation No. 6



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Response to proposed Variation No. 6 of WCDP

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1 Introduction

RPS is instructed by Borg Developments and Cairn to prepare this submission in respect of the proposed Variation No. 6 to the *Wicklow County Development Plan 2022 – 2028* (WCDP) to revise the Wicklow Core Strategy and associated housing targets, and a number of related housing objectives.

As the owner of substantial lands at Fassaroe in Bray, Borg Developments and Cairn has an interest in the contents of the WCDP as it affects the future development of its lands. The lands at Fassaroe in the ownership of Borg Developments are currently zoned for a mix of uses under the *Bray Municipal District Local Area Plan 2018 – 2024* (Bray MD LAP 2018). The main land use zoning objective for the lands is for residential development with other complementary uses such as employment, education and community, neighbourhood centre and open space also provided for. The lands at Fassaroe are designated by Wicklow County Council (WCC) to accommodate a significant new residential population and employment opportunities.

Borg Developments and Cairn generally welcomes the proposed variation to the WCDP, in particular its provisions in relation to the status of the Bray Municipal District Local Area Plan 2018 in the context of the WCDP and to the clarifications in the Core Strategy that all lands zoned for residential use will be supported for the delivery of housing during lifetime of the Plan.

This submission however, seeks to include a number of further clarifications or modifications to the Variation with regard to:

- The incorporation of the Bray MD LAP 2018 and associated zoning into the WCDP;
- The omission of policies or objectives from the WCDP which would apply a sequential or phased approach to development / grant of permissions of residential zoned lands required for updated core strategy housing growth requirements; and
- Confirmation that the Fassaroe lands fall within the “metropolitan town”, “suburban / urban extension” category of Bray in the newly added “Table 6.1 – Areas and Density Ranges”.

2 Incorporation of the Bray MD LAP 2018 and Associated Zoning into the WCDP

There are a number of revisions to section 1.2 of the WCDP, ‘Structure of the Plan’, proposed as part of Variation No. 6. Section 1.2 of the WCDP describes the overall content and structure of the WCDP which comprises of three volumes.

Volume 2 to date is stated as comprising of ‘town plans’ for a number of settlements in the County. Variation No. 6 now proposes that Volume 2 will also contain the following:

- b) *the land use zoning and key development objectives maps for the Local Area Plan settlements / areas of Wicklow Town – Rathnew and Blessington which have separate Local Area Plans (the written statement is published in a separate Local Area Plan);*
- c) *Local Planning Frameworks for the settlements / areas of Greystones – Delgany & Kilcoole, Arklow & Environs and Bray Municipal District (including Enniskerry & Kilmacanogue) when adopted.*

Separately to the description of the content of the three volumes of the Plan, Variation No. 6 proposes to revise a current provision of the WCDP that “separate Local Area Plans are in place [for a number of specified settlements] which will be reviewed during the lifetime of this plan”. It is proposed to revise this statement to the following:

“On adoption of this County Development Plan in 2022 Local Area Plans are in place and form part of this County Development Plan, which will be reviewed during the lifetime of this plan.

As the Bray MD LAP 2018 was in place at the time of adoption of the WCDP in 2022 this proposed revision suggests that the Bray MD LAP 2018 has formed part of the WCDP since 2022. This revision is in principle welcomed by Borg Developments and Cairn as it does seek to clarify that the Bray MD LAP 2018 and its associated zoning forms part of the WCDP. It is noted that the status of the Bray MD LAP 2018 and a number of other LAPs for settlements in the county have previously been called into question by An Bord Pleanála (ABP) / An Coimisiún Pleanála (ACP) in a number of its determinations. Specifically, we refer to a recent decision reached by ACP in relation to a proposed Strategic Housing Development (SHD) for lands at

Fassaroe (ABP-313314- 22), in which the status of the Bray MD LAP 2018 (and therefore the zoning of lands set out within) was questioned by ACP's Inspector.

While the proposed revision seeks to clarify that LAPs in place at the time of adoption of the WCDP in 2022 now form part of the WCDP, given that this clarification was not in fact included in the version of the WCDP adopted in 2022 (as appears to be suggested in the proposed revised wording of section 1.2), we have a concern in relation to this provision alone being sufficient to indisputably incorporate the Bray MD LAP 2018 at the current time into the WCDP. We therefore request that a further revision is made to the content of Volume 2 to include a part 'D' of Volume 2 which will unequivocally confirm that Bray MD LAP 2018, and other LAPs to be replaced with Local Planning Frameworks, now form part of the WCDP.

This revision would be consistent with approach to the rest of the proposed content of Volume 2.

This proposed revision to Volume 2 should also be reflected in section 3.4 of the proposed revised Chapter 3 relating to Zoning and to Local Area Plans and Local Planning Frameworks. The Variation proposes some revisions and additions to this section relating to the content of Volume 2. We submit that these provisions should be further revised to confirm that the remaining LAPs which were in place in 2022 specifically form part of Volume 2 pending the adoption of the new 'Local Planning Frameworks'.

On a point of procedure, we note that the documentation placed on display on the WCC Consultation Portal for proposed Variation No. 6 does not include the detail of the proposed additions to Volume 2 of the WCDP. While we note that the documents proposed to be included in Volume 2 are available elsewhere on the WCC website, it is our understanding that under section 13 of the Planning and Development Act 2000, as amended, all of the proposed Variation should be placed on display in a single location.

3 Omission of Policy and Objectives that would apply a sequential or phased approach to development / grant of permissions

3.1 Proposed Revisions to Core Strategy

Borg Developments and Cairn welcome a number of proposed revisions and new provisions of Chapter 3 of the WCDP 'Core Strategy' under proposed Variation No. 6. These relate to:

- Increased housing targets for both the County and Bray;
- The omission of "Table A: LAP Towns" which had previously identified 40ha of surplus residential zoned land in Bray.
- The addition of Core Strategy Objectives 1 – 3 for the stated reason to support the immediate term delivery of housing on current zoned land. Proposed Core strategy Objective 1 in particular provides that:

"All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan."

These Core Strategy revisions are generally supportive of the development of all zoned lands within the lifetime of the WCDP.

3.2 Conflicting Existing Phasing and Sequencing Policy

While the revisions to the Core Strategy suggest that all zoned land should be available for development throughout the lifetime of the WCDP, we note however that there are no revisions proposed under Variation No. 6 to objectives or policy regarding the phasing and sequencing of housing as set out in Chapter 6 of the WCDP. This would result in conflicting policy provision within the WCDP.

In this regard, it is submitted that a number of objectives and standards in the WCDP, relating to phasing of residential development, currently frustrate the achievement of Core Strategy targets and conflict with Core

Strategy Objective 1 which states that all residential zoned lands will be supported for development in the lifetime of the current plan. If this objective and the Core Strategy targets are to be achieved in the lifetime of the plan there should be no phasing of sequential policy restricting the order in which zoned land is granted permission or developed.

One such conflicting and problematic policy in light of the revised Core Strategy provisions is CPO 6.19 which states:

"The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter. The Council reserves the right to refuse permission for any development that is not consistent with these principles."

The zoning principles set out in section 3.5 of the WCDP suggest that strategic sites identified in the RSES would take priority over infill development within built up areas outside of town centres / cores, however a number of the policies of Chapter 6 may suggest that even if lands are zoned, that the order of development / grant of permissions could be required to be sequenced in a manner extending outwards from the centre of settlements. The policies of sections 6.3.2, 6.3.4 and CPO 6.19 could potentially result in situations whereby lands identified as necessary to achieve Core Strategy housing growth targets / requirements, and have been zoned accordingly, could be refused permission on the grounds that there are some other zoned lands closer to a town centre yet undeveloped.

3.3 Precedent Examples of Phasing and Sequencing Policy Conflicting with Achievement of Core Strategy Targets

We are aware of a number of cases in which ACP has refused permission for housing on zoned lands required for the achievement of Core Strategy targets due to phasing or sequencing policies.

ABP-313314- 22

In the case of the aforementioned refusal of permission of the SHD application ABP-313314-22 at Fassaroe incorporating 650 no. dwellings, when discussing the principles of sequential development and phasing, the ACP Inspector's Report firstly highlighted provisions of the WCDP at sections 6.3.2, 6.3.4 and CPO 6.19 (quoted above). Having regard to these policy provisions, the Inspector stated that he considered:

"that the application site is a peripheral site located at a significant distance from Bray town centre. There is a significant extent of undeveloped land between the site and the town centre which would be 'sequentially' preferable, and the application site is not contiguous to existing development of significant scale. Furthermore, the site is largely separated from the existing built-up area by the N/M11 road which forms a significant barrier. Accordingly, I do not consider the proposed development would be consistent with the principles of sequential development and phasing as outlined above [sections 6.3.2, 6.3.4 and CPO 6.19]."

This consideration fed through to a reason for refusal of permission, despite the fact that the Core Strategy of the WCDP (prior to proposed Variation No. 6) clearly identified a need for the development of 2,897 No. dwelling units outside of the built-up area of Bray, and the only lands zoned outside of the current built up area of Bray are at Fassaroe.

ACP-317445-23 (WCC Ref. 23/342)

An application for 98 no. houses in Coolagad, Greystones was subject of a decision to refuse permission by WCC in 2023, with the Planning Authority citing CPO 6.19 among their reasons for refusal. In this regard, despite the fact that the lands were zoned for residential development the Planning Authority considered that it would materially contravene objective CPO 6.19 of the Wicklow County Development Plan 2022 amongst others.

WCC's decision was appealed to ACP by the applicant. In their assessment of the application, ACP's Inspector also referenced objectives of the WCDP, including CPO 6.19, stating that the proposal was located on a *"peripheral site on the outskirts of the built-up area of the settlement and would not follow the principles of sequential development"*. In its order, ACP followed its Inspector's recommendation and refused permission for the development, again citing CPO 6.19 as part of a reason for refusal.

SHD ACP-313825-22

In January 2026, an SHD application for 344 no. residential units on residential zoned lands in Ballyoulster, Celbridge, Co. Kildare was refused permission by ACP. Within the reasons and considerations for refusing permission ACP cited, amongst other Core Strategy objectives, a compact growth objective (Objective CS 05 of the *Kildare County Development Plan 2023 – 2029*) which promotes development on town centre and brownfield sites. While the objective CS 05 requires only 30% of all new housing to be within the existing footprint of the settlement, the reason for refusal nevertheless suggested that the Commission could not be satisfied that the development would not be contrary to CS 05.

Conclusion on Precedent Cases

From the foregoing, there is clear precedence whereby sequencing or phasing policies have at least partially led to the refusal of planning permission on zoned residential lands within settlements in which core strategy targets had not yet been met. Such sequencing policies have in practice resulted in similar outcomes to priority or phased zoning objectives.

In this regard, we note that since the publication of the section 28 Guidelines *NPF Implementation: Housing Growth Requirements*, the Office of the Planning Regulator (OPR) has advised WCC to reconsider the use of a phased approach to zoning. This advice was issued in the context of a submission made by OPR on the Draft Arklow Local Planning Framework (LPF) / Variation No. 5 of the WCDP. In this submission, it encouraged WCC:

“to reconsider the need for phasing at this point in time, and instead review and rezone, where otherwise appropriate, Residential Phase 2 lands as Phase 1 in order to provide flexibility in delivery of sites and to facilitate the ongoing pipeline for housing delivery and to meet the housing growth requirements as set out in the Housing Growth Requirements.”

It is clear from its submission that the OPR wishes to see increased flexibility in the delivery of housing on appropriately zoned lands through the removal of potentially conflicting provisions of Development Plans in relation to the phasing of development.

We submit that similar to the removal of phased zoning, any other policies which would otherwise impose a phasing or sequencing of the granting of permission and delivery of development on zoned lands should also be removed.

3.4 Conclusion and Suggested Revisions re Sequencing and Phasing Objectives

The principle of sequential approach to development should inform the zoning of residential land in the first instance once the Core Strategy has identified land requirements. If land is identified as necessary to achieve Core Strategy housing targets / requirements and is accordingly zoned for residential development, there should be no policies or objectives included in the development plan that would restrict the order of planning permission delivery / development of these lands. Such policies would have the effect of obstructing planning consents and delivery of development on essential lands, thereby adding to the delays in the delivery of new housing and frustrating the achievement of Core Strategy housing growth targets.

Policies or objectives which would impose an order of priority or sequencing of development of residential zoned lands should only be applied if a Development Plan incorporates zoning provision for additional or surplus residential lands beyond the requirements of the Core Strategy, and in such cases the sequencing / priority or phasing policies should only apply specifically to lands zoned in addition to or surplus to the requirements of the Core Strategy.

The “*Sequential Approach*” to planning for residential development and how it should be applied in development plans is addressed in section 6.2.3 of the *Development Plans Guidelines for Planning Authorities* (Development Plans Guidelines). It states *inter alia*:

“It is a policy and objective of these Guidelines that planning authorities adopt a sequential approach when zoning lands for development, whereby the most spatially centrally located development sites in settlements are prioritised for new development first, with more spatially peripherally located development sites being zoned subsequently.”

The Guidelines continue to set out a sequential test for residential zoning in settlements and also set out a number of exceptions to the sequential approach to zoning.

It is important to note that the Development Plans Guidelines do not recommend that a further sequential or phasing test be applied at development management stage to lands which are zoned in accordance with the Core Strategy. As explained above such provision would work against the achievement of Core Strategy housing growth targets / requirements.

The only development management scenario in which the Development Plans Guidelines recommends that a sequence of priority may be applied to zoned lands is if they comprise of “*Additional Provision*” lands. “*Additional Provision*” of residential lands are lands which are zoned in addition to those required to deliver the Core Strategy housing supply targets for a settlement. Given the proposed provision of Core strategy Objective 1 under Variation No. 6 the Planning Authority has confirmed that all zoned lands are supported for development during the life of the WCDP and accordingly, there are effectively no “*Additional Provision*” lands remaining.

Having regard to the foregoing, we request that:

- The provisions of section 6.3.2 relating to priority locations for new residential development (second and third paragraphs) be deleted;
- All of section 6.3.4 be deleted; and
- CPO 6.19 be deleted.

4 Confirmation that Fassaroe development lands fall within the “*Metropolitan Town*”, “*Suburban / Urban Extension*” category of Bray for the Purposes of Identifying Appropriate Density

With regards to the proposed changes and additions to Chapter 6 of the WCDP, Borg Developments and Cairn acknowledge their support of the inclusion of “*Table 6.1 – Areas and Density Ranges*”, which provides greater clarity on WCC’s targets for the density of residential development throughout the county.

The density ranges set out in Table 6.1 are based on the “*Areas and Density Ranges*” classifications set out in the ‘*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*’ (Compact Settlements Guidelines). Table 6.1 identifies Bray as a ‘Metropolitan Town > 1,500 population’ noting that it comprises of both ‘Centre and Urban Neighbourhoods’ and ‘Suburban / Urban Extension’ areas. The proposed Variation however, does not incorporate any definition or map clarifying what areas of Bray are ‘Centre and Urban Neighbourhoods’ and what are ‘Suburban / Urban Extension’ areas. We note that the Compact Settlement Guidelines recommend that Planning Authorities should consider defining and clarifying different area types when preparing land use plans. Section 3.2.1 of the Guidelines states:

“To give effect to the Guidelines and in support of a plan-led approach, when preparing a land use plan for a settlement, the planning authority should consider defining and mapping central, urban, suburban, urban extension and edge areas (Figure 3.2 refers).”

In line with this recommendation, we request that the Planning Authority either incorporate a map / series of maps defining the different area types for relevant settlement corresponding to the provisions of proposed Table 6.1 or make some relevant clarifications within Table 6.1 itself.

With regard to Bray and lands at Fassaroe specifically, we request that Table 6.1 confirms that the area type ‘Metropolitan Towns (>1,500 population) Suburban / Urban Extension’ is applicable to Fassaroe.

We set out in Table 4.1 hereunder a consideration how the Fassaroe lands fall within or not, the various area types within a Metropolitan Town (>1,500 population). The table concludes that the most applicable area type for Fassaroe is ‘Urban Extension’.

Table 4-1: Consideration of Most Applicable Area Type for Density Purposes for Lands At Fassaroe

Area Types	Applicable To Fassaroe	Reasons and Considerations
Metropolitan Towns (>1,500 population) – Centre and Urban Neighbourhoods		
The town centre and immediately surrounding neighbourhoods	No	Fassaroe is not located in the town centre of Bray or its immediately surrounding neighbourhoods
Strategic and sustainable development locations, and	No	<p>Strategic and sustainable development locations are described in section 4.4.4 of the <i>Development Plan Guidelines for Planning Authorities 2022</i> as “key development sites that may comprise lands or sites for urban regeneration and / or transport-led development”.</p> <p>The lands at Fassaroe are greenfield lands. Development here will not comprise urban regeneration.</p> <p>The development at Fassaroe is not transport-led, i.e. the lands are not / will not be provided with transportation services in advance of development. Table 3.3 of the <i>Bray and Environs Transport Study 2019</i> by NTA, TII, Wicklow County Council and Dún Laoghaire Rathdown County Council, confirms that the lands will be served by “new bus services in line with demand” and that the services will be subject of “phased introduction as dwellings are completed”.</p> <p>Section 4.4.4 of the <i>Development Plans Guidelines for Planning Authorities 2022</i> also state that strategic and sustainable development locations “should either be covered by an existing Local Area Plan or SDZ Planning scheme or be the subject of a development plan objective to prepare a statutory plan for that area”.</p> <p>The Fassaroe lands fall within the area of the <i>Bray Municipal District Local Area Plan 2018</i> (along with all of the rest of Bray town in County Wicklow). The Fassaroe lands are not however, subject of a specific focussed Local Area Plan or an SDZ Planning Scheme or subject of an objective of the Wicklow County Development Plan to prepare such a statutory plan focussed on the Fassaroe lands. In this regard it does not have the statutory planning framework envisaged in the Development Plans Guidelines that would be typical for ‘strategic and sustainable development locations’.</p>
Lands around existing or planned high capacity public transport nodes or interchanges (defined in Table 3.8)	No	<p>There are no existing or planned high capacity public transport nodes or interchanges, as defined in Table 3.8 of the Guidelines, at Fassaroe.</p> <p>Table 3.8 defines a ‘high capacity public transport nodes or interchange’ as “lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail, light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects ‘Core Bus Corridor’ stop”.</p> <p>The lands at Fassaroe are more than 1km from the Bray DART / railway station; they are over 1km from the Brides Glen Luas stop; and are over 500m from the permitted Bray BusConnects route with the closest stop on the Dublin Road in Bray Town Centre.</p>
Metropolitan Towns (>1,500 population) – Suburban / Urban Extension		
Suburban Areas – low density car-orientated residential areas at the edge of town	No	Fassaroe comprises greenfields outside the existing suburban area of Bray.

Urban Extension – greenfield lands at the edge of the existing built-up footprint that are zoned for residential or mixed use (including residential) development	Yes	<p>The Fassaroe lands are greenfield lands at the edge of the existing built up footprint of Bray i.e. the Fassaroe lands are the next available greenfield lands at the western side of Bray albeit on the opposite side of the N11. They are zoned for a mix of uses including primarily residential development.</p> <p>The <i>Bray Municipal District Local Area Plan 2018</i> notes that the expansion of the town is severely constrained on all sides and that to achieve its target population, Fassaroe will be developed. The LAP provides for the provision of local / neighbourhood level (Level 4) services only at Fassaroe. It is identified in the LAP as an expansion area for Bray to be served by the existing higher order services of Bray Town Centre.</p>
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5 Summary of Proposed Revisions to Proposed Variation No. 6

Following on from the points raised in **Sections 2 to 4**, we respectfully request that the following revisions set out in **Table 5-1** be incorporated into the final Variation No. 6. Existing Text of the WCDP is set out in black. Revisions proposed as part of proposed Variation No. 6 by WCC are set out in red. Further revisions requested in this submission on behalf of Borg Developments and Cairn are set out in green.

Table 5-1: Policy and Objective Revisions requested for incorporation into Variation No. 6 of WCDP

CDP Section	Current Development Plan Provision / Proposed Development Plan Provision	Change Requested
Section 1.2	<p><i>Volume 2 contains:</i></p> <p>a) a set of 'town plans' for the following settlements: <i>Ashford, Aughrim, Avoca, Baltinglass, Carnew, Donard, Dunlavin, Laragh-Glendalough, Newcastle, Newtownmountkennedy, Rathdrum, Roundwood, Shillelagh and Tinahely;</i></p> <p>b) the land use zoning and key development objectives maps for the Local Area Plan settlements / areas of Wicklow Town – Rathnew and Blessington which have separate Local Area Plans (the written statement is published in a separate Local Area Plan);</p> <p>c) Local Planning Frameworks for the settlements / areas of Greystones – Delgany & Kilcoole, Arklow & Environs and Bray Municipal District (including Enniskerry & Kilmacanogue) when adopted.</p>	<p><i>Volume 2 contains:</i></p> <p>a) a set of 'town plans' for the following settlements: <i>Ashford, Aughrim, Avoca, Baltinglass, Carnew, Donard, Dunlavin, Laragh-Glendalough, Newcastle, Newtownmountkennedy, Rathdrum, Roundwood, Shillelagh and Tinahely;</i></p> <p>b) the land use zoning and key development objectives maps for the Local Area Plan settlements / areas of Wicklow Town – Rathnew and Blessington which have separate Local Area Plans (the written statement is published in a separate Local Area Plan);</p> <p>c) Local Planning Frameworks for the settlements / areas of Greystones – Delgany & Kilcoole, Arklow & Environs and Bray Municipal District (including Enniskerry & Kilmacanogue) when adopted.</p> <p>d) the Greystones – Delgany & Kilcoole Local Area Plan 2013 – 2019, the Arklow and Environs Local Area Plan 2018 – 2024 and the Bray Municipal District Local Area Plan 2018 – 2024 pending the adoption of a Local Planning Framework for each settlement respectively.</p>
Section 3.4	<p><i>"As part of the new LAP adoption process for the settlements of Wicklow Town – Rathnew and Blessington, the land use zoning and key development objectives maps for these LAP settlements / areas were integrated into Volume 2 of the County Development Plan by way of variation (Variations 2 and 3).</i></p>	<p><i>"As part of the new LAP adoption process for the settlements of Wicklow Town – Rathnew and Blessington, the land use zoning and key development objectives maps for these LAP settlements / areas were integrated into Volume 2 of the County Development Plan by way of variation (Variations 2 and 3).</i></p>

For the remaining settlements (Bray, Enniskerry, Kilmacanogue, Greystones – Delgany, Kilcoole and Arklow), 'Local Planning Frameworks' (which will replace their current LAPs) which set out settlement specific objectives including land use zoning and key development objectives maps are to be integrated into Volume 2 of this County Development Plan by way of variation. Until they are replaced, the current LAPs for these settlements form part of this County Development Plan."

For the remaining settlements (Bray, Enniskerry, Kilmacanogue, Greystones – Delgany, Kilcoole and Arklow), 'Local Planning Frameworks' (which will replace their current LAPs) which set out settlement specific objectives including land use zoning and key development objectives maps are to be integrated into Volume 2 of this County Development Plan by way of variation. Until they are replaced, the current LAPs for these settlements form part of Volume 2 of this County Development Plan."

6.3.2 – Location of New Residential Development	<p>"In accordance with the NPF, RSES and the Core / Settlement strategies set out in Chapters 3 and 4 of this plan, new housing development shall be generally required to locate on suitably zoned / designated land in towns and villages.</p> <p>The priority for new residential development shall be in the designated town / village / neighbourhood centres, in the 'primary zone' or in the historic centre of large and small villages, through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, particular cognisance must be taken of the need to respect the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.</p> <p>Where insufficient land is available in the centres of settlements, new housing development shall also be permitted on greenfield lands that are zoned / designated for housing."</p>	<p>"In accordance with the NPF, RSES and the Core / Settlement strategies set out in Chapters 3 and 4 of this plan, new housing development shall be generally required to locate on suitably zoned / designated land in towns and villages.</p> <p><i>The priority for new residential development shall be in the designated town / village / neighbourhood centres, in the 'primary zone' or in the historic centre of large and small villages, through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, particular cognisance must be taken of the need to respect the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.</i></p> <p><i>Where insufficient land is available in the centres of settlements, new housing development shall also be permitted on greenfield lands that are zoned / designated for housing."</i></p>
6.3.4 - Phasing	<p>"The development of zoned / designated land should generally be phased in accordance with the sequential approach:</p> <ul style="list-style-type: none">• Development shall extend outwards from the centre of settlements with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;• A strong emphasis shall be placed on encouraging infill opportunities and better use of under-utilised land; and• Areas to be developed shall be contiguous to existing developed areas. <p>Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal."</p>	<p><i>"The development of zoned / designated land should generally be phased in accordance with the sequential approach:</i></p> <ul style="list-style-type: none">• <i>Development shall extend outwards from the centre of settlements with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;</i>• <i>A strong emphasis shall be placed on encouraging infill opportunities and better use of under-utilised land; and</i>• <i>Areas to be developed shall be contiguous to existing developed areas.</i> <p><i>Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal."</i></p>
CPO 6.19	<p>"The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter. The Council reserves the right to refuse permission for any development that is not consistent with these principles."</p>	<p><i>"The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter.</i></p> <p><i>The Council reserves the right to refuse permission for any development that is not consistent with these principles."</i></p>

Response to proposed Variation No. 6 of WCDP

**Table 6.1 –
Areas and
Density
Ranges**

Areas	Density Ranges (net)	Applicable to	Areas	Density Ranges (net)	Applicable to
Metropolitan Towns (>1,500 population) Centre and Urban Neighbourhoods	50 dph - 150 dph	Bray Greystones- Delgany	Metropolitan Towns (>1,500 population) Centre and Urban Neighbourhoods	50 dph - 150 dph	Bray – existing built up area Greystones- Delgany
Metropolitan Towns (>1,500 population) Suburban / Urban Extension	35 dph - 50 dph Up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations.		Metropolitan Towns (>1,500 population) Suburban / Urban Extension	35 dph - 50 dph Up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations.	Bray - Fassaroe