

	<h1>Variation No.6</h1>
---	-------------------------

<b>Who are you:</b>	Private Individual
<b>Name:</b>	Greenleaf Homes Limited
<b>Reference:</b>	VAR6-163023
<b>Submission Made</b>	January 7, 2026 4:32 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Chapter 3 – Proposed Variation No. 6

**Write your observations here:**

Dear Sir/Madam,

Please see attached submission made by Greenleaf Homes in relation to Variation No 6.

**Upload a File (optional)**

Greenleaf Homes Submission 6 Jan 26.pdf, 0.34MB



Variation No 6,  
Administrative Officer  
Planning Section  
Wicklow County Council  
Station Road  
Wicklow Town,  
Co. Wicklow

6<sup>th</sup> January 2026

**RE: PROPOSED VARIATION No 6, WICKLOW COUNTY DEVELOPMENT PLAN 2022 - 2028**

Dear Sir/Madam

We wish to make a submission in respect of the proposal to vary the Core Strategy and the Housing Policy of the adopted Wicklow County Development Plan 2022 – 2028.

At the outset, we wish to clarify that we are supportive of the increase in the population and housing targets proposed to be set by the Council. However, we are concerned that the densities assumed in the proposed variation will give rise to a development format that is economically unviable. In such a situation, whilst the population and housing targets may have been increased through this variation, in practice because of the economic unviability, the measure will not give rise to the expansion in housing delivery that is urgently required and which is stated Government Policy.

Based on the published amended *Table 3.4 – Future Housing Capacity Wicklow (Levels 1-6 Settlements as of Q3 2025)* we can see that the that the proposed average overall density for development in certain settlements is as follows.

Level	Settlement	Proposed Density
1	Bray	73.32 units per hectare
2	Wicklow – Rathnew	49.42 units per hectare
3	Greystones – Delgany	46.6 units per hectare

It is respectfully submitted that development in the density ranges outlined in the table above will involve the construction of significant numbers of high-density apartments. In Bray in particular, where the average density across the entire settlement is proposed to be c. 75uph, the problem will be most acute.

Figures released by the Department of Housing in early December 2025 indicated that the cost of construction of an average apartment in Dublin had reached €605,000 whilst apartments in



Suburban Areas had reached €559,000. An extract from the Business Post article of the 6<sup>th</sup> December 2025 is below.

### Total development costs by location

Building Type	GREATER DUBLIN AREA	CORK	LIMERICK	GALWAY	NORTHWEST REGION
Semi-D House (110 sq.m)	€465,363	€421,207	€385,876	€404,385	€356,490
Suburban Apartment (91 sq.m)	€559,097	€535,449	€509,130	€517,207	€474,775
Urban Apartment (91 sq.m)	€605,536	€538,860	€522,258	€530,335	n/a
Student Bedspace (30 sq.m)	€211,997	€198,508	€189,943	€192,405	n/a
Duplex (75 sq.m)	€477,556	€451,295	€438,275	€444,932	€397,905
Triplex (50 sq.m)	€377,076	€353,283	€342,113	€346,572	€316,721

Source: Department of Housing • [Get the data](#) • Created with [Datawrapper](#)

As can be seen from the table above, according to the data released by the Department of Housing, the average cost of a Suburban apartment is €559,097. This is for an apartment with a Gross Floor Area measuring 91 sq.m. (979 sq.ft). This would equate to your average 2-bedroom apartment of circa 72 – 75 sq.m. Based on these figures, the cost to construct apartments in the greater Dublin area is €571 per gross square foot.<sup>1</sup>

The average sale value for apartments in all locations in County Wicklow is well below this level. There are a limited number of apartments on the market in the settlements referred to above but those that are for sale are second hand and would appear to be more than 15 years old. They appear to be available at prices ranging between €300psf - €450psf (Based on the Gross Floor Area). Therefore, it is simply not viable at current sale prices for apartments to be built in these locations.

Conversely, the cost of construction of Semi Detached Housing and Duplex Units is significantly lower to such an extent that construction of these formats of development is viable.

<sup>1</sup> Gross Floor Area is normally 20% - 25% greater than the advertised net floor area of apartments



The result of the densities in the proposed Variation No 6 is to place a reliance on the delivery of a development format which is well known to be economically unviable. Accordingly, the revised housing numbers proposed in the variation will not be delivered in practice and will not contribute towards resolving the housing shortages being experienced.

This specific issue has already been addressed in a letter from the Minister for Housing to the Chief Executives of all the City and County Councils on the 11<sup>th</sup> of December 2025. This letter, which was signed by Minister James Browne TD and Minister John Cummins TD, advised Councils to apply "realistic and deliverable residential density assumptions". The letter proceeds to advise Councils that they should assume that net densities range between 65% and 80% of the Gross Site Areas.

For the reasons set out above, it is respectfully submitted that the proposed Variation No 6 does not apply realistic and deliverable density assumptions and instead relies on densities that are not viable economically.

To address this we would respectfully suggest that the Council makes the following amendments to proposed Table 3.4. These are as follows

- a) Discount the figures in the columns entitled "*Zoned land with no live permission*" by c. 30% to reflect the net site areas available in each Settlement. This to have the effect of taking the net developable site areas for all Priority 1 & Priority 2 zoned lands into account.
- b) Reduce the density assumptions inherent in the column entitled "*Estimated Capacity of Zoned Land with no live permission*". We would suggest that net densities be reduced to 50uph in Bray and to 35uph in Levels 2 & 3 Settlements.

Each site, when presented for consideration should be considered on its merits and in order to create the opportunity to maximise the expansion of housing delivery realistic and deliverable density provisions should be applied.

Yours Sincerely,  
**GREENLEAF HOMES LIMITED**

A blue ink signature of Mark Elliott, written in a cursive style.

**MARK ELLIOTT**  
Managing Director