



Variation No.6

Who are you:	Agent
Name:	John Spain Associates on behalf of Brookhampton Limited
Reference:	VAR6-141847
Submission Made	January 16, 2026 4:02 PM

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24159 - Kilcoole Submission to CDP Var. No. 6 Final.pdf, 0.86MB

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

Date: 16th January 2026
JSA Ref.: YM/AZ 24159

Dear Sir / Madam,

RE: SUBMISSION TO THE PROPOSED VARIATION NO. 6 TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2022–2028 (AS VARIED) IN RELATION TO LANDS AT BULLFORD, KILCOOLE, CO. WICKLOW

1.0 INTRODUCTION / EXECUTIVE SUMMARY

John Spain Associates, 39 Fitzwilliam Place, Dublin 2, D02 ND61, on behalf of our client Brookhampton Limited, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, welcomes the opportunity to make this submission to Wicklow County Council (WCC) in respect of the Proposed Variation No. 6 to the Wicklow County Development Plan (CDP) 2022–2028 (as varied), in relation to the lands under the control of our clients at Bullford, Kilcoole, Co. Wicklow. The consultation period runs from the 5th of December 2025 to the 16th of January 2026.

Brookhampton Limited, who has delivered a significant number of developments across the Dublin and Wicklow areas and is committed to delivering sustainable medium density residential development in the Wicklow area over the coming years, are the owners of a substantial landbank of serviced lands, west of and spatially sequential to the existing built-up area of Kilcoole, a Level 4 Self-Sustaining Town in the Core Region under the Wicklow Settlement Hierarchy under the Wicklow County Development Plan 2022 – 2028 (CDP).

The subject lands are currently zoned residential (R22), town centre (TC), open space (OS) and subject to Action Plan 9 designation, and the northern portion of the overall landholding is designated as Strategic Land Bank (SLB) under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (2013 LAP). Under the Proposed Material Alterations to the Draft Greystones-Delgany and Kilcoole Local Planning Framework (LPF) 2025, the southern part of the lands is designated as "SLO 5 – Bullford", and proposed as "RN1: New Residential – Priority 1" and "TC: Town Centre" zoned lands, which supports the delivery of much needed housing and commercial development on the subject landholding.

However, the SLB lands under the 2013 LAP have been omitted from the settlement boundary of Kilcoole under the draft LPF 2025, and subsequent proposed material alterations. The SLB lands comprise serviced lands which are contiguous to the built up area of Kilcoole and lands proposed to be zoned for residential development (RN1) under the LPF 2025 (SLO 5 – Bullford, and SLO 9 – Darraghville (RN1), which represent an efficient and sustainable means of ensuring sufficient zoned land for delivery of new housing and should be considered for residential development.

This submission is supported by a Kilcoole Zoning Review and Settlement Capacity Note prepared by John Spain Associates, a copy of which is included at Appendix 1, which supports the allocation of additional growth to Kilcoole and the inclusion of available serviced lands (such as our client's lands at Bullford) to contribute to the housing targets for Kilcoole over the remainder of the current plan period as well as a longer-term horizon, having regard to an infrastructure-led approach to compact growth which provides a strong basis for planning for additional housing delivery.

We highlight that part of our client's landholding is currently the subject of a planning application for 99 no. residential units under Reg. Ref.: 25/60623 (71 no. houses, 20 no. duplex apartments and 8 no. apartments), and a decision on the application from the Planning Authority is imminent following submission of a Further Information Response on the 9th January 2026. In addition, a separate planning application for a discount food store (Lidl), a café and 5 no. dwellings on the north-eastern part of the client's overall landholding (fronting Main Street), which are zoned TC, is currently the subject of a first party appeal to under ACP Ref. No.: 323073–25, following a refusal by WCC under Reg. Ref.: 24/60545. A decision on this application was due on the 11th November 2025, but has been extended. We note that under Reg. Ref.: 24/60545 the Planning Authority, having regard to the proposed land uses, accepted the principle of the proposed development of a Lidl supermarket on the TC zoned lands within the Level 4 Settlement of Kilcoole.

The current Phase 1 residential application under Reg. Ref.: 25/60623 and the Lidl application under Reg. Ref.: 24/60545/ ACP Ref. No.: 323073–25 represent the first phase of a wider 5 phase masterplan across the applicant's lands at Bullford which, subject to planning approval, could deliver c. 253 no. residential units, with a childcare facility, public open space and supporting infrastructure envisaged, to be delivered over c. 5 to 10 years, based on securing permission in 2026 for at least the first phase of development as proposed under the current application under Reg. Ref.: 25/60623.

As detailed in this submission, Kilcoole has been identified for targeted growth and plays an important role within the wider Dublin Metropolitan Area, demonstrating how plan-led objectives, strategic transport investment, and community infrastructure can be translated into tangible residential development. In this context, Proposed Variation No. 6 provides an opportunity to ensure that the revised Core Strategy and housing targets are clear, transparent and aligned with the Section 28 guidance, and that Development Plan objectives facilitate timely delivery on suitably located lands.

This submission is framed as a constructive and evidence-based contribution to the statutory consideration of Proposed Variation No. 6. It reflects on Kilcoole's established role as a Level 4 Self-Sustaining Town and examines how the revised housing growth framework and land supply assumptions interact at settlement level.

In this context, the submission identifies three matters that are considered central to the robustness, transparency and long-term effectiveness of Proposed Variation No. 6:

- **Revised Housing Targets** - There is a need for clearer articulation of how the revised housing growth figures have been derived, including how the additional provision envisaged under Policy and Objective 2 of the NPF Implementation: Housing Growth Requirements (Housing Growth Guidelines) has been applied, and whether the targets adequately reflect the full scope of that guidance. In summary, from the initial calculations WCC would need to allocate an additional c. 3,806 no. units to the settlements from that indicated in Table 3.5 of the Proposed Variation.
- **Allocation of Additional Growth to Kilcoole** - In recognition of Kilcoole's position within the settlement hierarchy as a Level 4 Settlement (Self-Sustaining Town), and

the need to ensure that the revised Core Strategy provides an enabling framework to support additional housing delivery over the medium to long term, it is submitted that additional growth should be allocated to Kilcoole.

In this context, it is also considered reasonable and appropriate to reconsider Kilcoole's current status within the settlement hierarchy and reclassify from a Level 4 Settlement ('Self-Sustaining Town') to a Level 3 (Self-Sustaining Growth Town), either as a standalone settlement or as part of the Greystones - Delgany broader settlement. According to Census 2022, Kilcoole had a recorded population of 4,569 residents (a 7.8% increase between 2016 and 2022) a level of growth that places Kilcoole at the upper end of the population band for Level 4 "Self-Sustaining Towns" (maximum 5,000). Given the planned housing growth for Kilcoole in this variation, it is respectfully submitted that the proposed reclassification of Kilcoole as a Level 3 (Self-Sustaining Growth Town) would more accurately reflect of its evolving population growth trend, its functional role within the regional settlement network, and its capacity to support and sustain future growth consistent with the objectives of the County Development Plan.

- **Inclusion of available serviced lands** - Serviced lands represent the most efficient and sustainable means of delivering new housing supply in line with the objective of Proposed Variation No. 6 to activate supply and ensure sufficient zoned land for short-term delivery. It is considered that all lands that are suitable, serviced and available for housing delivery should be identified for residential development under the proposed variation. Thus, it is considered Proposed Variation No. 6 should include land use zoning maps identifying the areas where additional growth can be delivered.

In the context of the above, notwithstanding the separate 'call for sites' process ongoing, it is considered that the Planning Authority should be considering options to bridge any delivery gap as part of the Proposed Variation, with supporting zoning maps and objectives to release relevant lands to deliver housing in the short term. In this regard this submission highlights that our client's SLB lands at Bullford, Kilcoole form part of a consolidated and sequential landbank capable of contributing to sustainable housing delivery over a 10 year period, within both the remaining duration of the current adopted plan and the lifespan of the forthcoming 10-year development plan, and should thus be designated for residential development (RN1).

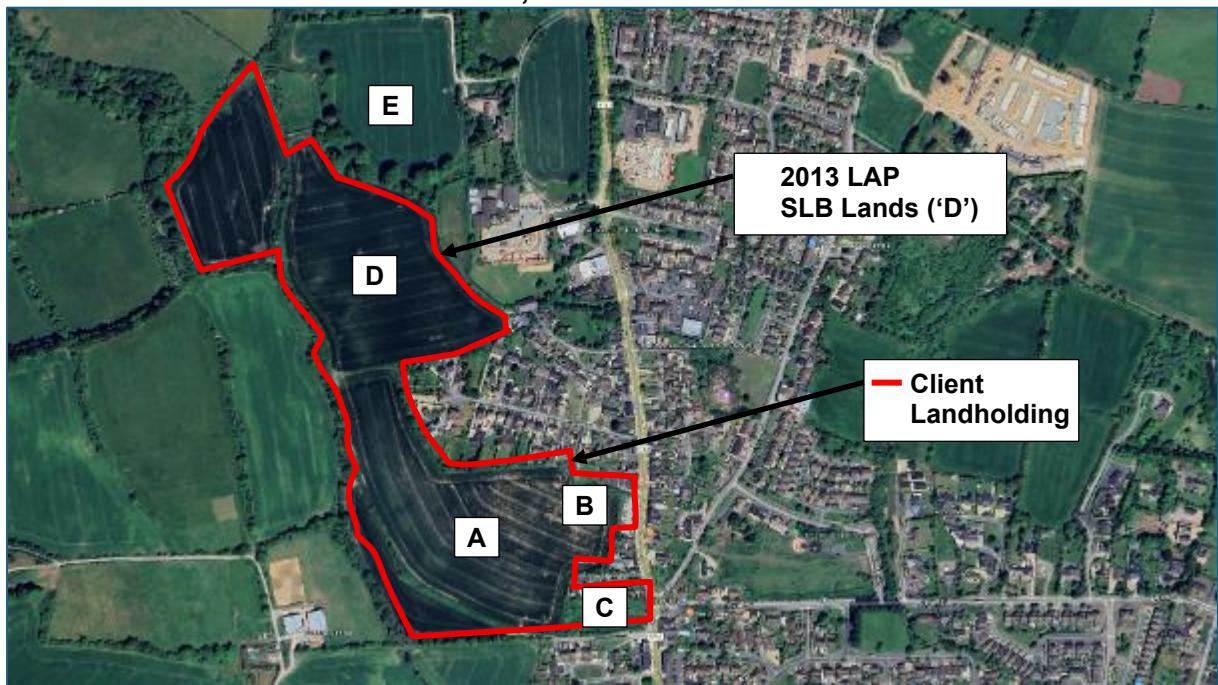
In this regard, it is submitted that Proposed Variation No. 6 should incorporate the relevant land-use zoning maps, including those prepared in respect of Proposed Material Alterations to the Draft LPF 2025 (Proposed Variation No. 4), amended to incorporate the additional residential zoning of our client's SLB lands at Bullford, Kilcoole as outlined above, or alternatively set out a clear timeframe for when the updated land use zoning maps for each settlement, reflecting the revised Core Strategy figures, will be incorporated into the CDP via a variation.

2.0 RELEVANT CONTEXT

2.1 SUBJECT LANDS – LOCATION & DESCRIPTION

The subject lands are located at Bullford, Kilcoole, west of Kilcoole town centre and the existing built-up area ('D' in the image below). The lands are contiguous to our client's larger landbank to the south which includes frontage onto the western side of Main Street (the R761), facing Sea Road. The lands are located at a sequentially suitable location to cater for the growth of the town, being directly adjacent to the existing built-up area.

Figure 2.1: Aerial Photograph of Bullford, Kilcoole with the approximate overall landbank identified with a red outline, SLB lands marked 'D'

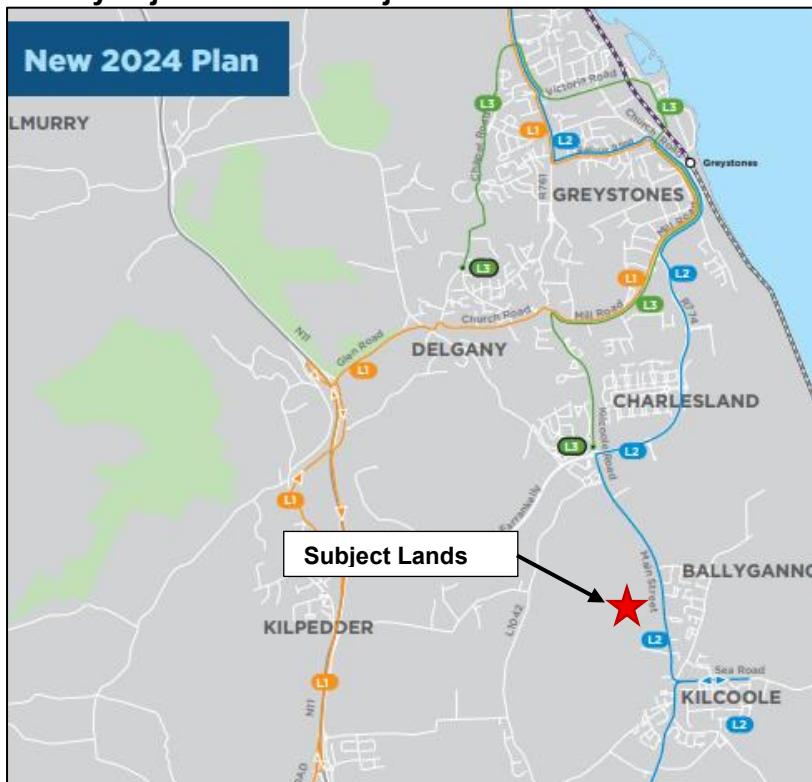


Source: Google Earth

The location, scale, and physical characteristics of the site, as well as its proximity to Kilcoole town centre and strategic infrastructure, underline its potential to contribute to the long-term growth of the settlement in accordance with compact, infrastructure-led development principles. This setting confirms the lands at Bullford, through the coordinated development of the overall landholding, as:

- Directly served by the newly implemented BusConnects Route L2 (as shown in Figure 2.2), which provides high-frequency connectivity between Kilcoole, Greystones DART station, and Bray.
- Located approximately 1.7 km from Kilcoole Train Station, providing commuter rail access to Dublin City.
- Connected to Kilcoole Town Centre, facilitating high-quality pedestrian and cycling links to the town centre, schools, and adjoining residential areas.

Figure 2.2: Extract from BusConnects Network illustrating Route L2 serving Kilcoole directly adjacent to the subject lands



Source: BusConnect.ie

2.2 PLANNING POLICY CONTEXT

As elaborated on below, our client's overall landholding, including the northern portion (SLB lands), have long been identified as lands that can contribute to the growth of Kilcoole. However as elaborated on below, the SLB lands have been omitted from the Kilcoole settlement boundary under the Proposed Variation No. 4) despite being located between two landbanks identified for residential development at material alterations stage of the variation.

Greystones-Delgany and Kilcoole Local Area Plan 2013

Under the Greystones-Delgany and Kilcoole Local Area Plan 2013-2019 (2013 LAP), the southern portion of our client's landholding at Kilcoole (c. 8.48 ha.) is zoned residential (R22), town centre (TC), open space (OS) and is subject to Action Plan 9 designation, and the northern portion of the overall landholding is designated as Strategic Land Bank (SLB), as illustrated in Figure 2.3 below.

Draft Greystones-Delgany and Kilcoole Local Planning Framework 2025 (Proposed Variation No. 4)- Material Alterations

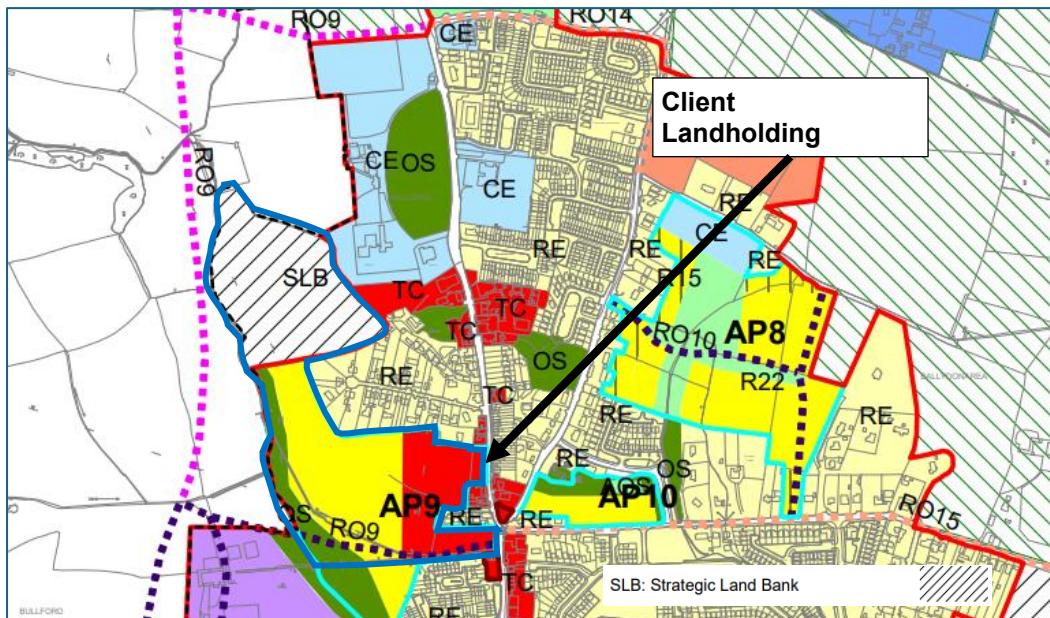
Under the Material Alteration to the draft Greystones-Delgany and Kilcoole Local Planning Framework 2025 (LPF) 2025, the southern part of the overall landholding is designated as "SLO 5 – Bullford", and proposed as "RN1: New Residential – Priority 1" and "TC: Town Centre" zoned lands, which supports the delivery of much needed housing and commercial development on the subject landholding.

However, as demonstrated in the map extract below, while the draft Local Planning Framework (LPF) 2025 (prepared under Proposed Variation No. 4) positively designates the southern portion as 'RN1' lands and subject to "SLO 5 – Bullford" and introduces 'RN1' lands

and "SLO 9 – Darraghville" to the immediate north of our client's landholding, the lands located between the two land parcels (our client's SLB lands) has been omitted from the settlement boundary of Kilcoole.

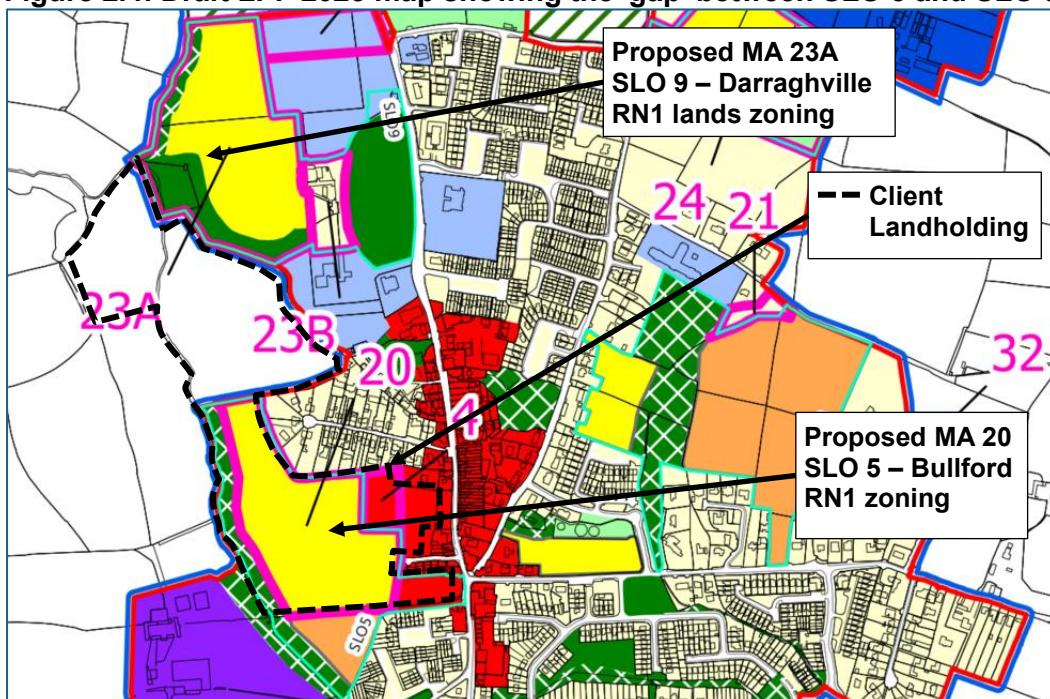
These SLB lands represent available, serviced lands, contiguous to the built up area of Kilcoole and lands proposed to be zoned for residential development under the LPF 2025, which are suitable for delivery of housing, which represent an efficient and sustainable means of ensuring sufficient zoned land for delivery of new housing and should be considered for residential development.

Figure 2.3: LAP 2013 map showing 'SLB' designation, with client's landholding outlined in blue



Source: Greystones – Delgany and Kilcoole LAP 2013, Land Use Zoning Objectives Map A, with JSA overlay

Figure 2.4: Draft LPF 2025 map showing the 'gap' between SLO 5 and SLO 9



Source: Draft LPF 2025 / Proposed Variation No. 4 Map, JSA overlay, 2026

Our client acknowledges the Council's work on the Draft LPF (Variation No. 4), and notes the inclusion of additional RN1 zoned lands, including on the southern portion of our client's overall landholding at Material Alterations stage, which is welcomed. However, we highlight that the zoning designations proposed under draft Variation No. 4 are based on a more constrained Core Strategy, and as such does not take account of the "Additional Provision" (50% Headroom) now required by national policy, particularly Policy and Objective 2 of the NPF Implementation: Housing Growth Requirements (Housing Growth Guidelines).

Proposed Variation No. 6

The introduction of the expanded housing requirement for Kilcoole represents a material change in the planning policy context from draft Variation No. 4 to Variation No. 6. In this context, we highlight that the subject SLB lands, which are serviced lands contiguous to the built up area of Kilcoole and lands proposed to be zoned for residential development (RN1) under the LPF 2025 (i.e. SLO 5 – Bullford, and SLO 9 – Darraghville (RN1), which represent a practical and sequential infill location that can assist in meeting the housing targets.

3.0 SUBMISSION REQUESTS

3.1 REVISED HOUSING TARGETS

Kilcoole has experienced a relatively constrained rate of housing delivery during the current plan period, as reflected in the limited quantum of units currently under construction and permitted but not commenced, when set against the revised housing targets proposed under Variation No. 6. Further detail is provided in Appendix 1, including the settlement-level targets and pipeline metrics (Table 2.3) and the site-specific Settlement Capacity Audit for Bullford (Table 3.1).

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

Section 28 Ministerial Guidelines on the Housing Growth Requirements indicates that, as part of a development plan variation, planning authorities should review the adequacy, serviceability and deliverability of existing zoned lands in order to respond effectively to updated housing growth requirements, including the need to maintain an appropriate level of flexibility in land supply over a longer horizon. In this regard, Policy and Objective 2 of the Housing Growth Guidelines envisages an "additional provision" of up to 50% over and above the baseline housing growth requirement. While it appears that Wicklow County Council has included a level of additional provision within the Proposed Variation No. 6, the basis and quantum of this allowance is not clearly set out in the Variation documentation.

By way of example, Table 3.3 of the Variation No. 6 identifies a Targeted Settlement Growth for the period 2022–2031 of 22,067 units for the County, however, the derivation of this figure is not explained, and it does not directly align with the time periods presented in Table 3.1, which are expressed from Q1 2025 onwards. From our review, where the revised baseline targets are applied to the remaining plan period from 2025 to 2031, the implied allowance above the housing growth requirement appears to be in the order of c. 23%, rather than the full 50% additional provision envisaged under Policy and Objective 2 of the Housing Growth Guidelines.

It is considered that the housing target should be increased to provide for the full 50% additional provision consistent with the Housing Growth Guidelines. This would result in the

housing growth target increasing to c. 21,714 no. units in total for the period 2025 to 2031 (this is based on 14,476 no. units as per Table 3.1 + 50%). In summary, from the initial calculations, WCC would need to allocate an additional c. 3,806 no. units to the settlements in the County from that indicated in Table 3.5 of the Proposed Variation.

In this context, a number of clarifications and corrections would assist in strengthening the robustness of Proposed Variation No. 6. Specifically, regarding the data presented for settlements such as Kilcoole, the basis for the estimated capacity split between Phase 1 and Phase 2 lands under Table 3.4 is not clearly explained. In addition, internal inconsistencies are evident in the Variation tables, including Table 3.3, where the settlement-level figures appear to aggregate to 22,689 units rather than the stated total of 22,067 units.

We request that WCC (i) set out the baseline requirement and the quantum of additional provision applied, (ii) correct any inconsistencies in the tables, and (iii) provide clarification on methodology underpinning the Phase 1 / Phase 2 capacity split.

3.2 ADDITIONAL GROWTH TO BE ALLOCATED TO KILCOOLE

Having regard to Kilcoole's designation as a Level 4 Settlement ('Self-Sustaining Town') within the County settlement hierarchy, and the above which considers that the housing target for the County should be increased to fully align with the Housing Growth Guidelines, it is submitted that Kilcoole should be allocated a proportionate share of this additional growth.

Kilcoole's established position on the commuter rail corridor (Kilcoole Train Station) and the upgraded BusConnects network (Route L2) provides a strong foundation for transit-oriented development. If the plan does not recognise or make provision for the longer-term potential of serviceable lands such as the northern portion of our client's Bullford landholding (the SLB lands), it risks limiting Kilcoole's capacity to function as a self-sustaining settlement.

This is particularly important as Development Plans move to a 10-year cycle, land supply must be planned over a longer horizon. In this context, large, consolidated and sequential sites such as the SLB lands at Bullford, which are well suited to orderly phased delivery, should be facilitated to help meet Wicklow's housing targets.

Table 3.5 of Proposed Variation No. 6 identifies a new housing target for Kilcoole of 878 units for 2025–2031, with 648 units of further growth required to 2031 after accounting for units under construction and permitted but not commenced. This demonstrates the critical need to facilitate the activation of sequential, serviceable lands within the settlement.

If the additional c. 3,806 units required to reach the full 50% additional provision were distributed proportionately across the settlement targets in Table 3.5, this would equate to an illustrative uplift of c. 187 units for Kilcoole (increasing the 2025–2031 target from 878 to c. 1,065 units). Such an expansion would directly strengthen Kilcoole's capacity to accommodate sustained population growth and to support an enhanced role within the County's settlement hierarchy.

In this context, it is both reasonable and appropriate to reconsider Kilcoole's current status within the settlement hierarchy and reclassify from a Level 4 Settlement ('Self-Sustaining Town') to a Level 3 (Self-Sustaining Growth Town), either as a standalone settlement or as part of the Greystones - Delgany broader settlement. According to Census 2022, Kilcoole had a recorded population of 4,569 residents, representing a 7.8% increase between 2016 and 2022 (rising from 4,239 residents in 2016). This level of growth places Kilcoole at the upper end of the population band for Level 4 "Self-Sustaining Towns," which ranges from approximately 1,500 to 5,000 persons under the Wicklow County Council Settlement Strategy.

Given the revised housing targets and the scale of development now anticipated, Kilcoole is realistically positioned to exceed the 5,000 person threshold in the short term. A town of this size, coupled with clear evidence of continued residential demand, demonstrable population growth, and its strategic proximity to larger settlements, aligns more closely with the characteristics of a Level 3 Self-Sustaining Growth Town, which is intended to accommodate higher levels of housing, employment, and service-based expansion in a balanced and plan-led manner.

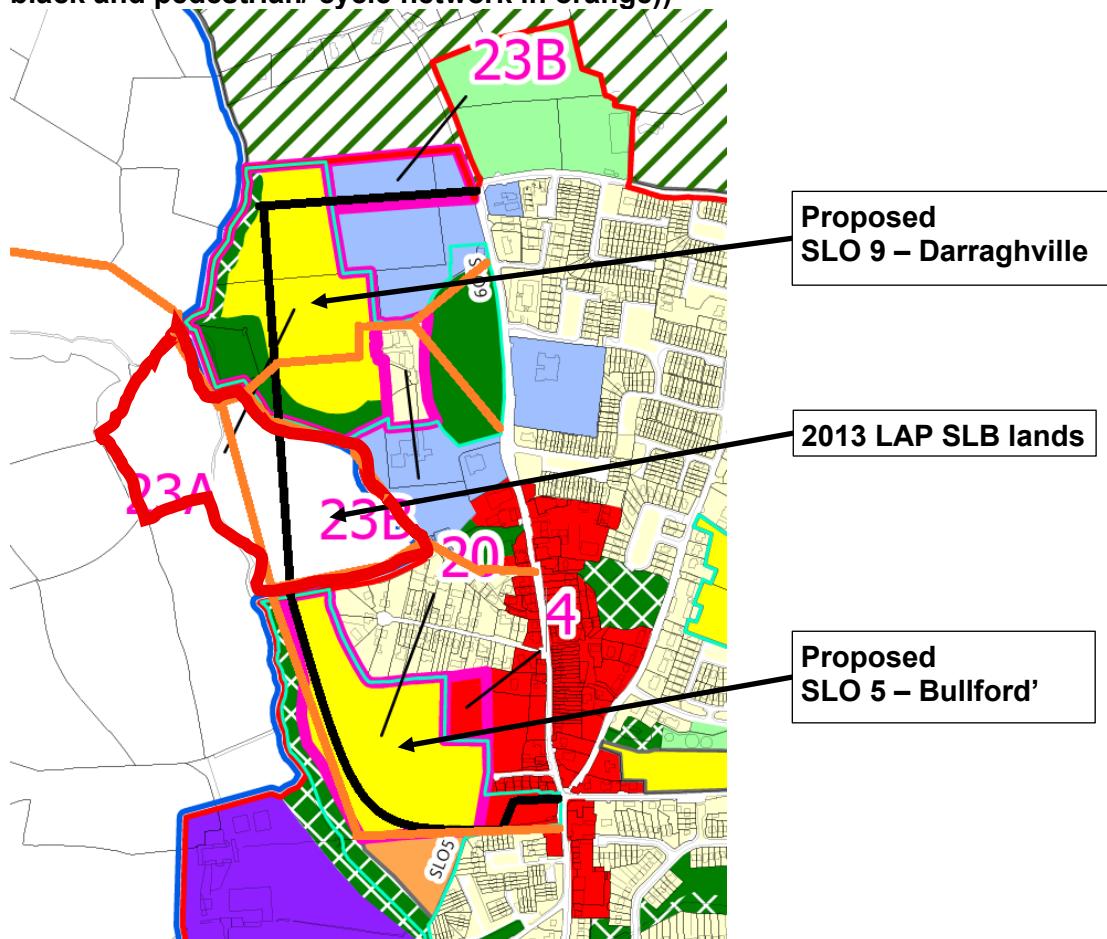
On this basis, Kilcoole's reclassification as a Level 3 Self-Sustaining Growth Town represents a more accurate reflection of its evolving population growth trend, its functional role within the regional settlement network, and its capacity to support and sustain future growth consistent with the objectives of the County Development Plan and the Government housing growth requirements for Wicklow under the Revised NPF and NPF Implementation Guidelines.

3.3 INCLUSION OF AVAILABLE SERVICED LANDS

Serviced lands represent the most efficient and sustainable means of delivering new housing supply in line with the objective of Proposed Variation No. 6 to activate supply and ensure sufficient zoned land for short-term delivery. Thus, it is considered that all lands that are suitable, serviced and available for housing delivery should be identified for residential development under the proposed variation and it is considered Proposed Variation No. 6 should include land use zoning maps identifying the areas where additional growth can be delivered.

In this context we highlight that there are undeveloped lands at Bullford, Kilcoole, i.e. the SLB lands under the 2013 LAP, which extend to approximately 10 ha., the zoning of which are ideally positioned to contribute to Kilcoole's housing growth target. Having regard to the proposed SLO5 and SLO9 RN1 zoned lands under the Material Alterations to the Draft LPF 2025, the inclusion of the SLB lands constitutes a realistic opportunity to create a consolidated and well-structured landholding capable of supporting the orderly planning of a future residential-led mixed-use neighbourhood, as illustrated in the map extract below and at Figure 2.3 above.

Figure 3.1: Zoning Map showing the client lands (SLB lands under the 2013 LAP and potential connections from proposed SLO 9 – Darraghville (proposed road network in black and pedestrian/ cycle network in orange))



Source: Draft LPF 2025 / Proposed Variation No. 4 Map, JSA overlay, 2026

It is considered that the northern part of the holding, formerly identified as a Strategic Land Bank, should be considered for residential zoning (RN1 or RN2), reflecting the RN1 and TC lands to the south. This area lies directly between the proposed 'SLO 5 – Bullford' to the south, and the newly proposed 'SLO 9 – Darraghville' to the north.

Leaving the northern portion of our client's landholding unzoned would result in a fragmented settlement boundary. Zoning these lands would complete the gap in the urban form, between proposed 'SLO 5 and 'SLO 9', enabling coordinated infrastructure delivery and supporting the logical, sequential expansion of the town to the west. We respectfully submit that these lands represent a serviceable and deliverable opportunity that should be prioritised to meet the additional housing provision discussed in Section 3.1.

We therefore request that under Proposed Variation No. 6 WCC should provide for the consideration of all lands that are suitable, serviced and available to contribute to additional housing growth in the County, including recognising the Bullford landholding as a sequential landbank for Kilcoole's housing growth, and ensure that the Core Strategy does not impede its orderly progression.

Serviced lands represent the most efficient and sustainable means of delivering new housing supply in line with the objective of the proposed variation to activate supply and ensure sufficient zoned land for short-term delivery.

Thus, it is submitted that Proposed Variation No. 6 should incorporate the relevant land-use zoning maps, including those prepared in respect of Proposed Material Alterations to the Draft LPF 2025 (Proposed Variation No. 4), amended to incorporate the additional residential zoning of our client's SLB lands at Bullford, Kilcoole as outlined above, or alternatively set out a clear timeframe for when the updated land use zoning maps for each settlement, reflecting the revised Core Strategy figures, will be incorporated into the CDP via a variation.

4.0 CONCLUSION

Our client, Brookhampton Limited, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, welcomes the opportunity to make this submission on the Proposed Variation No. 6 to the Wicklow County Development Plan (CDP) 2022–2028 (as varied).

It is respectfully requested that the Planning Authority have regard to the points raised in this submission to ensure that an appropriate planning framework is set out for the sustainable future development on our client's lands at Bullford, Kilcoole, which will be for the benefit of the County as a whole.

Yours faithfully,



John Spain Associates

APPENDIX 1 – KILCOOLE ZONING REVIEW & SETTLEMENT CAPACITY AUDIT (BULLFORD, KILCOOLE)

EXECUTIVE SUMMARY

This Zoning Review and Settlement Capacity Audit (Review) has been prepared in the context of Proposed Variation No. 6 to the Wicklow County Development Plan 2022–2028 (as varied), in respect of lands in the control of our client, Brookhampton Limited, Collegefort, Carpenterstown Road, Castleknock, Dublin 15, at Bullford, Kilcoole, Co. Wicklow.

The purpose of this Review is to provide a concise evidence base addressing: (i) Kilcoole’s settlement context and recent delivery performance; (ii) the revised housing targets and pipeline metrics set out in Proposed Variation No. 6; and (iii) a preliminary Settlement Capacity Audit for the Bullford landholding.

Key findings from this review are summarised below:

- Kilcoole has experienced population growth over recent census periods (Table 2.1), reaffirming its role as a Level 4 Self-Sustaining Town within the County settlement hierarchy.
- Housing delivery in Kilcoole has been relatively low in the context of County-wide completions (Table 2.2), it indicates that land capacity does not always translate into deliverable output, particularly where delivery is reliant on constrained sites.
- Proposed Variation No. 6 identifies a housing target for Kilcoole of 878 units for 2025–2031. After accounting for units under construction (173) and permitted but not commenced (57), a residual requirement of 648 units remains to be facilitated to 2031 (Table 2.3).
- The inclusion of additional RN1 and TC zoned lands under the Material Alterations to the Draft LPF 2025 is welcomed, noting that these lands can contribute to part of this housing requirement.
- The remainder of the Bullford landholding includes lands that were previously identified as a Strategic Land Bank under the 2013 LAP. In the context of revised housing growth requirements, the omission of these centrally located lands would fragment the logical town edge and reduce the availability of serviced, sequential land supply.
- The Bullford landholding is sequential to the existing built-up area, benefits from established services and transport connectivity, and is capable of phased delivery. It represents a practical and deliverable land supply option.

1.0 INTRODUCTION

This Review supports the accompanying submission to Proposed Variation No. 6 and should be read in conjunction with the main submission document.

The Report follows the guidance set out in the Housing Growth Requirements framework and the Development Plans Guidelines for Planning Authorities 2022, including the requirement for a Settlement Capacity Audit to identify zoned, serviced or serviceable lands with residential development potential. Key external datasets used in the assessment include CSO settlement datasets (NDQ10) and the Wicklow County Council Variation documentation.

2.0 SETTLEMENT CONTEXT AND REVIEW OF LAND SUPPLY IN KILCOOLE

Kilcoole is identified as a Level 4 Self-Sustaining Town, the settlement benefits from commuter rail connectivity via Kilcoole Rail Station and enhanced bus connectivity including

BusConnects Route L2. These connections support an infrastructure-led approach to compact growth and provide a strong basis for planning for additional housing delivery.

Table 2.1 summarises Kilcoole's population change across recent census periods. The settlement has continued to grow, due to its strategic location and its role within the wider Dublin Metropolitan Area.

Table 2.1: Population growth context – Kilcoole and County Wicklow (CSO Census)

	2006	2011	2016	2022
Kilcoole (Census Town)	3,252	4,049	4,239	4,569
% Change	-	25%	5%	8%
County Wicklow	126,194	136,640	142,425	155,851
% Change	-	8%	4%	9%

Source: CSO Census Data

Table 2.2 shows annual residential completion data for Kilcoole and for Wicklow County Council, as presented in Proposed Variation No. 6. The proportion of County completions attributable to Kilcoole has varied and has generally remained low, suggesting that delivery performance may be constrained even where zoned land is available.

Table 2.2: Dwelling completions – Kilcoole within County Context

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025 (Q1–Q3)
Kilcoole	1	7	22	66	1	2	14	22	11	27
Wicklow County Council	352	478	586	1,115	1,038	747	1,538	1,428	1,338	914
% of County	0.3%	1.5%	3.8%	5.9%	0.1%	0.3%	0.9%	1.5%	0.8%	3.0%

Source: CSO StatsBank (Table NNDQ10) & Variation No. 6 Documents

Tables 2.3 and 2.4 below summarise the settlement-level targets and pipeline indicators in Proposed Variation No. 6 and the current Core Strategy. In particular, Proposed Variation No. 6 identifies a new housing target of 878 units for Kilcoole for 2025–2031, with 648 units of further growth required to 2031 after accounting for units under construction and permitted but not commenced (Table 2.3). The Core Strategy also records Kilcoole's aggregate settlement housing targets to Q2 2028 and Q4 2031 (Table 2.4).

Table 2.3: Key settlement-level housing targets and land supply metrics for Kilcoole (Proposed Variation No. 6)

Metric	Kilcoole
Housing stock (2022)	1,543 units
Targeted housing growth 2022–2031	926 units
New housing target 2025–2031	878 units
Under construction (Q3 2025)	173 units
Permitted not commenced	57 units
Further growth required to 2031	648 units
Zoned land with no live permission	32 ha (est. capacity 1,094 units)
Phase 1 / Priority 1 capacity	796 units
Phase 2 / Priority 2 capacity	298 units
Zoned land required (to 2031)	18.5 ha
Zoned & serviced land available	31 ha

Table 2.4: Settlement / aggregate settlement housing targets to Q2 2028 and Q4 2031 (current Wicklow CDP 2022–2028 extract)

Metric (CDP Core Strategy Table 3.5)	Kilcoole
Housing stock (2016)	1,451
Completions 2017–2020	97
Estimated completions 2021–Q2 2022	20
Housing growth Q3 2022–Q2 2028	140
Housing growth Q3 2028–Q4 2031	30
Total housing growth 2016–2031	287

Table 2.3 shows that Kilcoole has a theoretical surplus of residential zoned land than required, but Table 2.2 makes clear that housing delivery has been uneven, with strong output in only a few years and low levels in others. As a result, the headline capacity figure may overstate what can actually be delivered during the plan period, particularly given the scale of increase expected between 2025 and 2031. Relying solely on the existing surplus to meet the ambitious new target of 878 units (2025–2031) presents a significant delivery risk, noting that not all lands zoned for residential development will be brought forward during the plan period.

3.0 CAPACITY ASSESSMENT OF THE SUBJECT SITE

The Strategic Land Bank (SLB) lands at Bullford are well placed to support housing delivery. Located between SLO 5 (Bullford) and SLO 9 (Darraghville), both designated as RN1 under the Material Alterations to the Draft LPF 2025, they occupy a logical infill position within the settlement boundary, rather than representing a leap to more peripheral locations. Zoning these lands would allow the Council to make effective use of the permitted 50% Headroom by adding genuinely deliverable capacity, helping to secure Core Strategy targets even if legacy constrained sites do not come forward.

The following is noted in relation to the SLB lands:

- The SLB lands are contiguous to our client's overall landholding at Bullford which is located west of Kilcoole town centre and has frontage to the western side of Main Street (R761) opposite Sea Road adjoining existing built-up footprint and sequential to the settlement. (SLO 5 (Bullford) RN1 lands under the Material Alterations to the Draft LPF 2025) and immediately south of SLO 9 (Darraghville), also designated as RN1 under the Material Alterations to the Draft LPF 2025, The current use comprises predominantly undeveloped / greenfield lands;
- The SLB lands provide a logical consolidation between SLO 5 and SLO 9 – Darraghville;
- Access is available through the overall landholding, access to which is provided via R761/Main Street;
- The lands are close to public transport connections, including BusConnects Route L2, and Kilcoole Rail Station;
- There is an opportunity to provide enhanced pedestrian footpath connections to town centre and key community infrastructure, and to provide safe cycle connections to town centre and rail station and integrate with emerging cycle proposals within the Draft LPF 2025 area;
- The lands can be serviced via the existing public water and wastewater network serving the area. Capacity is available within the wider Greystones/Kilcoole agglomeration to facilitate the connections, subject to the relevant connection agreements;
- In terms of community and social infrastructure, the lands are proximate to Kilcoole town centre services, education lands, and can incorporate open space and community gains in parallel with housing delivery.

4.0 SUMMARY & CONCLUSION

This document demonstrates that while Kilcoole has been assigned a significant housing target under Proposed Variation No. 6, historic delivery levels and the scale of the residual requirement introduce risk if the plan relies solely on legacy zoned lands to meet revised targets.

The Strategic Land Bank lands offer a clear and practical opportunity for phased housing development. Therefore, it is considered that the subject land should be zoned for residential use to support future delivery.