

	<h1>Variation No.6</h1>
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Who are you:	Agent
Name:	Cairn Homes
Reference:	VAR6-163607
Submission Made	January 16, 2026 4:49 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:

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MACCABE DURNEY BARNES

PLANNING | ENVIRONMENT | ECONOMICS

Our Ref: WCC CDP VAR6

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

16th January 2026

Re: Submission on Variation No. 6 of Wicklow Co. Co. Development Plan 2022-28 on behalf of Cairn Homes Properties Ltd ("Cairn Homes")

Dear Sir/Madam,

MacCabe Durney Barnes has prepared this submission on behalf of **Cairn Homes Properties Ltd ("Cairn Homes")** of 45 Mespil Road, Dublin 4, D04 W2F1 in response to the proposed Variation No. 6 of the Wicklow Co. Co. Development Plan 2022-28 '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).

Cairn Homes welcomes the Proposed Variation No.6 of the Wicklow County Development Plan 2022-2028, which can provide an important framework and clarification for the development of the County up to 2028, 2031 and up to 2040.

Overall, we note that this Variation has been prepared within a short time scale by the planning authority, in response to the NPF amendments. It includes substantive changes (largely positive) to the Core Strategy (Chapter 3) which will entail review and revision of the LPFs for consistency in due course. We acknowledge that Wicklow County Council has issued a 'call for sites' under a separate non-statutory consultation.

Of particular importance is the proposed amendment to effectively amalgamate the RN1/RN2 residential zonings for the life of the Development Plan up to 2028. This is considered a positive and necessary step to facilitate the progress of residential planning applications in towns across the county. The new Core Strategy Objectives 1 to 3 are very welcome in this regard. However, it is of concern that the planning policy regarding Sequential Assessment remains unaltered with the potential of undeveloped Priority 1 Brownfield lands to (be used by objectors) to restrict the development of Green Field sites. We submit that the Variation should include an additional 'Core Strategy Objective 4' to clarify that *'that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.'*

This submission highlights that housing targets applied to the Variation do not appear to apply Policy and Objective 2 of *NPF Implementation: Housing Growth Requirements' Guidelines* - to provide for an 'additional provision' of up to 50% over and above the housing growth target set out in Appendix 1.

It is therefore submitted that the proposed Variation under-estimates and under-provides for the long term required housing and zoning needs of the county. Our analysis points to a further growth requirement **up to 2031 of 24,662 units instead of 12,054 units and additional zoned lands of the order of 453 ha instead of 234 ha.**

This is clearly a significant difference in potential housing and zoned land need up to 2031 with major implications for designated settlements (particularly levels 1-3). The focus of new housing growth should clearly be directed towards the settlements in the top 4 Levels of the Settlement hierarchy with the most sustainable locations, good transport infrastructure and services; i.e. Bray, Greystones-Delgany, Wicklow Town, Newtownmountkenedy and Kilcoole.

Having regard to the Development Plan Guidelines 2022 and NPO 17, it is important that the Variation to the Core Strategy refer to, and incorporate 2022 Census information for the county and its settlements rather than referring only to housing stock and housing growth.

1 COMMENCEMENT OF PART 3, SECTION 5 OF PDA, 2024

The public notice for this Variation highlights that it is prepared under Section 13 of the Planning and Development Act 2000 (as amended).

We note that the Planning and Development Act 2024 (Commencement) (No 5) Order 2025 (SI 633/2025), Chapter 5 of the PDA 2024 which relates to preparation of Development Plans came into effect on 31 December 2025. It includes procedures for preparing, making and varying a development plan (ss42/55 and 58/59).

We note that the Commencement Circular (No 2025/06)¹ of 19 December 2025 states under 'Transitional Provisions' with regard to notices under sections 13 of Act of 2000 that

Subsection (2) of section 69 provides that the variation of a development plan under section 13 of the Act of 2000 shall continue under that Act on and after the repeal of section 13 of the Act of 2000 (i.e. 31 December 2025).

It is therefore our understanding that the legal context for the adoption of this Variation remains valid, despite changes in primary legislation.

2 OVERVIEW OF WICKLOW COUNTY COUNCIL ON DRAFT VARIATION NO. 6

At the outset, we have reviewed the documentation on Wicklow Co. Co.'s website. Relevant items for inclusion in the scope of this submission includes:

¹ https://assets.gov.ie/static/documents/1176e113/PDA_2024_Commencement_Circular_No._2025_06_Ch_5_and_6_of_Part_3.pdf

- Chapter 3 Core Strategy – the main focus of this submission are the amended figures presented in this section.
 - Section 3.1 Population & Housing Targets refers to figures from the NPF and NPF Roadmap 2018 and RSES/MASP 2019 and cites the Housing Supply Target Methodology for Development Planning’ (DHLGH2020)
 - Table 3.1 sets out the new housing unit targets for County Wicklow for the duration of this County Development Plan up to Q2 2028, for a further period up to Q4 2031 (which is the medium-term horizon of this plan) and the longer term up to 2040. This is based on the New Annual New Housing Growth Requirement to 2034 of 2,068 per annum.
 - The new housing target from 2025 to 2028 is 7238 units, compared to previous target of 8,467 from 2022 to 2028 (1411 per annum).
 - Table 3.2 defines Greystones-Delgany as a Metropolitan Area Self Sustaining Growth Town
 - Section 3.3 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”, NPOs have been updated.
 - Table 3.3 Targeted Settlement Growth 2022-2031. New Housing Targets. Requires analysis of ‘Housing Stock Growth 2022 – 2031’
 - Table 3.4 Future Housing Capacity Wicklow (as of Q3 2025).
 - Core Strategy Objective 1 –enables all RN1 and RN2 zoning to be considered equally.
 - Table 3.5 Revised Growth Targets 2025-31 – identifies additional land requirements for Greystones-Delgany up to 2031
 - Section 3.4 Zoning
- Chapter 6 Housing Strategy – Density policies updated to be consistent with the Sustainable Residential Development and Compact Settlements - Guidelines for Planning Authorities (2024)
 - Bray and Greystones Delgany designated Metropolitan Towns, 50 dph - 150 dph for urban centres/neighbourhoods and 35-50 dph suburban.
 - Blessington Key Town/Large Town 35- 50 dph

3 ANALYSIS OF HOUSING TARGETS SET IN CHAPTER 3, TABLE 3.1

The proposed variation provides for significant changes to the Development Plan’s core strategy, in Chapter 3, Table 3.1 sets out the new housing unit targets for County Wicklow for the duration of this County Development Plan up to Q2 2028, for a further period up to Q4 2031 (which is the medium term horizon of this plan) and the longer term up to 2040.

3.1 Comparison with other local authorities - Fingal County Council approach:

The requirement to review Development Plan housing requirements under the ‘NPF Implementation: Housing Growth Requirements’ - Guidelines for Planning Authorities applies to all planning authorities in the state and it useful to compare approaches applied in other Councils. We have reviewed similar Variations published for consultation and find it helpful to refer to the approach adopted by Fingal County Council (FCC) helpful to refer to as an exemplar that is most closely aligned with the NPF objectives.

MDB has compared how FCC have approached transposing the NPF targets at local level² in the Draft Variation No. 1 of the Fingal County Development Plan 2023 -29. There are some notable differences in the approach adopted by the two planning authorities:

1. **FCC’s core strategy only goes up to 2029, rather than for the longer period as indicated in the July s28 Guidelines. WCC has adopted a longer time frame out to 2040 (which is helpful in adopting a longer-term perspective of housing need).**
2. **FCC have included a 50% uplift in numbers as required by the s28 Guidelines. WCC’s Variation does not do this as required.**
3. **The RSES does not cater for a transfer of numbers into Fingal, but it does into Bray (which is not accounted for in the Wicklow Variation)**

Fingal County Council’s CDP NPF Annual Housing Requirement Supply Target as set out in Appendix 1 of the S28 Guidelines provided for an increase from 2,738 to 3,153 as illustrated below.

Table 1: New Housing Targets for Fingal (Source: NPF Implementation Guidance)

Local Authority	Existing Annual 2020 Housing Requirement Plan (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual Housing Growth Requirement to 2034	New Annual Housing Growth Requirement 2035-2040
Fingal County Council	1,717	2,738	3,153	2,146

FCC’s Variation sets out the rationale for its Variation as follows:

² <https://consult.fingal.ie/en/consultation/proposed-variation-no1-fingal-development-plan-2023-%E2%80%93-2029>

The following table outlines the total housing growth requirement for the County over the Development Plan period. The housing growth requirements set out in the NPF Implementation: Housing Growth Requirements Guidelines run from 2025. The requirements for the years 2023 and 2024 (2,738 annually) were calculated under the previous Housing Supply Target methodology. This combines with the new annual requirement for the years 2025 to 2029 inclusive (4,730 annually, including 50% uplift) to produce a housing growth requirement for the Development Plan of 29,126 housing units between 2023 and 2029.

Table 2.9: Housing Growth Requirements for Fingal County Council Area 2023-2029

A	B	C	D	E
Annual Req. 2023 + 2024 (Housing Supply Target)	New Annual Housing Growth Req. to 2034	150% Annual Housing Growth Req. to 2034	Total Housing Growth Req. 2025 to end 2029	Total 2023-2024 plus 2025 to end 2029 (A*2+D)
2,738	3,153	4,730	23,650	29,126

3.2 Wicklow CDP Variation

We compare this with WCC's NPF Annual Housing Requirement Supply Target as set out in Appendix 1 of the S28 Guidelines:

Table 1: New Housing Targets for Wicklow (Source: NPF Implementation Guidance)

Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual Housing Growth Requirement to 2034	New Annual Housing Growth Requirement 2035-2040
Wicklow County Council	745	1,411	2,068	931

WCC has sought to adopt the Figures set out in Appendix 1 of the Guidelines in Table 3.1 of the County Development, as set out in Variation No. 6 below:

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	7,238
Q3+Q4 2028	1,034	8,272
2029	2,068	10,340
2030	2,068	12,408
2031	2,068	14,476
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	26,266

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**.

Page 14 of the WCC Variation States:

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).

Page 4 of the Variation document (Chapter 3) notes Policy and Objective 2 of the Guidelines that Councils should ensure that the *‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan.*

In contrast to Fingal, it is evident that WCC has not included the 50% uplift in the figures in Table 3.1. The Variation does not provide for the additional provision in subsequent Tables either.

This has created an under estimation of targets and zoned land requirements in subsequent tables. MDB’s analysis suggests the figures should actually be:

- **Q1 2025 to Q2 2028 should be: 10,857**
- **Q1 2025 to Q4 2031 should be: 21,714**
- **Q1 2025 to Q4 2040 should be: 39,399**

The Variation does note (p.3 of Chapter 3) the proposed transfer of population from the rest of the GDA into Bray provided for under the Regional Spatial and Economic Strategy 2019-2031 (RSES) for the Eastern and Midland Region.

MASP 2019

In accordance with NPO 68, the Regional Assembly in July 2020 approved the ‘transfer’ of population growth of 13,000 from the city to the metropolitan area settlement of Bray, of which 9,500 would be to that part of Bray located in Co. Wicklow.

However, the figures in Table 3.1 do not appear to reflect the inclusion of this population.

The inclusion of the RSES transfer would increase the allocation to Wicklow (in the period up to 2031) by 9,500 persons. Based on an average household size of 2.6 this would yield a further c.3,654 dwellings.

The total housing need up to 2040 is therefore estimated at $39,399 + 3,654 = 43,053$. This would create a revised provision of **25,368 units by 2031. i.e..**

- **Q1 2025 to Q2 2028 should be: 10,857**
- **Q1 2025 to Q4 2031 should be: $21,714 + 3,654 = 25,368$**
- **Q1 2025 to Q4 2040 should be: 43,053**

Table 3.3 Targeted Settlement Growth and Table 3.5 Future Housing Capacity do not refer to the overall zoning uplift. Section 3.3 only notes *“The new housing targets are taken as a minimum levels of housing to be supported by zoning / development objectives in the 2025-2031 period.”*

On the basis of this analysis, with capacity for only 25,500, the Variation significantly underestimates housing and zoning provision for the period up to 2040 and will compound supply deficits in the County

4 TABLE 3.3 TARGETED SETTLEMENT GROWTH 2022-2031. NEW HOUSING TARGETS. REQUIRES ANALYSIS OF ‘HOUSING STOCK GROWTH 2022 – 2031’

2022 Census and Population Targets not cited

The Variation text (p.9 of Chapter 3) cites NPO17. This requires that for each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework (i.e. five cities and regional centres), may be identified for significant (i.e. 30% or more **above 2022 population levels**) rates of population growth.

NPO 17 In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages ...

We highlight that NPO 17 specifically refers to 2022 population levels, not housing numbers. The Variation seeks to apply this growth for 2022-2031 to a ‘Housing Stock’ figure for 2022. We submit that this is not compliant with the National Policy Objective which clearly refers to Population.

We note that the Variation omits multiple references to population throughout the revised chapter. It does not include the 2022 Census population for any of the settlements.

Given that the County Development Plan was based on dated 2016 Census information at the time of adoption, seems illogical not to take the opportunity to update the population data. As a context for providing up to date information on population trends (2016-2022). it is respectfully submitted that this should be considered as a basic level of information for a County

Development Plan. The Settlement Hierarchy (Table 3.2 of the Core Strategy) in the CDP is based on a population figure (the 2016 Census). In order plan for the long-term horizon of Q4 2031 for settlements in the County, this should have regard to the most recent Census available.

Table 3.4 Future Housing Capacity Wicklow (as of Q3 2025). It is based on average density of 44 units per hectare. This appears to be quite high for County Wicklow, where average densities being permitted are considerably lower .

Table 3.5 Revised Growth Targets 2025-31 – identifies additional land requirements for Greystones-Delgany up to 2031. The clarifies that this is the new target 2022-2031 as set out in Table 3.3, less the units already delivered from Q3 2022 to Q2 2025. The additional land requirements do not account for the 50% uplift required by the Guidelines.

We have undertaken an exercise below to examine the potential land requirements when the 50% uplift and RSES Transfer is applied to Table 3.5 Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-6).

Table 1 Considered amendments to Table 3.5 Revised Housing Growth Targets and zoned land provisions

Level	Town	New Housing Target	50% uplift	RSES Transfer	Units in progress	Further Growth Required up to 2031	density applied	WCC estimate of land required (ha)	Revised Zoned Land required (ha)	Zoned Land available
1	Bray	5,526	2763	3654	867	11,076	75	62	148	101
2	Wicklow - Rathnew	3,170	1585		1141	3,614	50	41	72	59
3	Arklow	3,793	1896.5		912	4,778	43	67	111	99
	Greystones - Delgany	1,717	858.5		476	2,100	50	25	42	45
	Blessington	806	403		806	403	0	0	0	0
4	Baltinglass	170	85		138	117	35	0.9	3	1.4
	Enniskerry	418	209		259	368	35	4.5	11	13
	Kilcoole	878	439		230	1,087	35	18.5	31	31
	Newtownmountkennedy	545	272.5		490	328	35	1.6	9	3
	Rathdrum	190	95		141	144	35	1.4	4	2.5
5	Ashford, Aughrim, Carnew, Dunlavin, Tinahely	489	244.5		308	426	35	7	12	32
6	Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh	206	103		86	223	25	5	9	14
		17,908	8,954	3,654	5,854	24,662		234	453	401

This analysis points to a **further growth requirement up to 2031 of 24,662 units instead of 12,054** and **additional zoned lands of the order of 453 ha instead of 234 ha**.

This is clearly a significant difference in potential housing and zoned land need up to 2031 with major implications for designated settlements (particularly levels 1-3).

The figures above present a broad pro-rata allocation of housing growth. The focus of new housing growth should clearly be directed towards the towns in the top 4 Levels of the Settlement hierarchy with the most sustainable locations, good transport infrastructure and services; i.e. Bray, Greystones-Delgany, Wicklow Town, Newtownmountkennedy and Kilcoole. The Table above illustrates there an over-reliance on Bray and Arklow to deliver housing stock, which shows there is a need to re-balance housing growth to Greystones-Delgany and Kilcoole in particular.

The undersupply of zoned land to meet housing objectives will comprise a review of additional lands to those already zoned Tier 1 or 2 in particular in the larger settlements of Bray, Greystones/Kilcoole, Arklow, Blessington and Wicklow-Rathnew particular on land banks adjoining currently zoned lands where there are opportunities to allow for the extension of services.

We invite Wicklow County Council to review these figures against its own projections shown in the Variation.

5 NEW CORE STRATEGY OBJECTIVES

Cairn Homes welcomes the inclusion of 3 new Core Strategy Objectives in Chapter 3, page 14 of the Variation which states:

In order to support the immediate term delivery of housing on said zoned lands, the following objectives will apply:

Core Strategy Objective 1

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.

Core Strategy Objective 2

Wicklow County Council will proactively engage with developers of sites with planning permission for housing to support the commencement and delivery of permitted housing development and assist in the unblocking of impediments where feasible.

Core Strategy Objective 3

Wicklow County Council will proactively work with infrastructure / utilities providers to ensure any service related impediments to the granting or permission for housing on zoned lands or to the delivery of permitted housing development are progressed.

Cairn has made the case over several submissions in the last 2 years on Draft LAPs and LPFs that the phasing approach being promoted was too restrictive, would delay the planning process and construction of thousands of homes across the county. Given the volume of housing that needs to be delivered in the county within the life of the current Wicklow County Development Plan 2022-28, the continuation of tiered approach to zoning was not appropriate.

The new Core Strategy Objectives reflect the government's position in the NPF Guidelines that where there is an *urgent need to increase housing supply Phasing may not be necessary In all cases, whether phasing is applied or not, development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.*

5.1 Sequential Approach

We note that the Development Plan still incorporates the 'Sequential Test' (p.22 of Chapter 3).

Principle 4: Sequential approach

The priority locations for new residential development will be:

- Priority 1 In the designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents, and maintaining existing parks and other open areas within settlements.*
- Priority 2 Strategic Sites as identified by the RSES and associated MASP*
- Priority 3 Infill within the existing built envelope of the town, as defined by the CSO Town boundary*
- Priority 4 Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken*

Wicklow Co. Co. is invited to consider that this objective has the potential to conflict with the 3 new Core Strategy Objectives, as Greenfield sites are only considered as Priority 4.

Town centre regeneration is of course very important, but it is challenging and complex to bring sites forward for development. It is submitted that a new Core Strategy Objective is included to clarify that the Sequential Approach will not be allowed to prevent greenfield sites progressing forward for permission and development.

The **Development Plans Guidelines for Planning Authorities (2022)** set out the following clear instructions at 4.4.1 Land/Sites Already Zoned that phasing is not a mandatory requirement and in circumstances where there is an urgent need to increase housing supply:

... when reviewing a development plan, it is recommended best practice that a phased approach be taken to prioritise the preferred sequence of development of such sites. However, phasing should be applied where there is a sound planning rationale for doing so, based on factors such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure.

This should also be viewed in the context of the urgent need to increase housing supply
Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the plan-making stage. In all cases, whether phasing is applied or not, development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.

It is Cairn's submission that this Sequential policy has the potential (particularly through Third Party Objections to development) to undermine the intent and spirit of the NPF Implementation Guidelines (2025) or the Development Plan Guidelines (2022) and clarification in the Variation would be helpful to complement the 3 Core Objectives.

Core Strategy Objective 4

In the context of the urgent need to increase housing supply the application of the Sequential Approach under policy 6.3.2, 6.3.4 and CPO 6.19 shall be applied with flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.

6 CONCLUSIONS

Wicklow County Council is requested to carefully consider Cairn Homes submission on Variation No. 6 of the County Development Plan presented in this letter.

Cairn Homes are committed to continuing the delivery of sustainable homes at scale in Wicklow and will continue to engage with the planning authority on the implementation of development of sites and future variation processes for the County Development Plan and LPFs.

Yours sincerely

A handwritten signature in black ink that reads "MacCabe Durney Barnes". The signature is written in a cursive style with a horizontal line underneath the name.

MACCABE DURNEY BARNES