

# Variation No.6

Who are you:	Agent
Name:	John Spain Associates on behalf Mrs. Barbara Ogilvy Watson
Reference:	VAR6-134111
Submission Made	January 16, 2026 2:01 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:

On behalf of our client, Mrs. Barbara Ogilvy Watson, [REDACTED]  
[REDACTED], we, John Spain Associates, 39

Fitzwilliam Place, Dublin 2, wish to make a submission to Proposed Variation No. 6 to the Wicklow County Development Plan 2022 - 2028 in relation to lands at Monalin, Newtownmountkennedy, Co. Wicklow. Please find submission enclosed.

### Upload a File (optional)

25257 Proposed Variation 6 Submission Mrs. B. Ogilvy WatsonFINAL.pdf, 1.09MB

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

Date: 16<sup>th</sup> January 2026  
Reference: JN 25257/IL/RK

Dear Sir/Madam,

**RE: SUBMISSION IN RESPECT OF THE PROPOSED VARIATION NO. 6 TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2022 – 2028 IN RELATION TO LANDS AT MONALIN, NEWTOWNMOUNTKENNEDY, CO. WICKLOW.**

## 1.0 INTRODUCTION & RECOMMENDATIONS

On behalf of our client, Mrs. Barbara Ogilvy Watson, [REDACTED], we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission to Proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 in relation to lands at Monalin, Newtownmountkennedy, Co. Wicklow.

Our client welcomes the opportunity to make a submission in relation to the proposed revisions to the Wicklow Core Strategy and associated housing targets, and a number of related housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement, and specifically in respect of Newtownmountkennedy (NTMK).

We note the separate but related "*Call for Sites: Land Suitable for Residential Development Non-Statutory Consultation*" made by Wicklow County Council at the end of December 2025, which invites landowners, homebuilders and other interested parties (including members of the public) to make a submission, identifying possible sites that they suggest could be considered for zoning for new housing development and could meet the objectives of the Guidelines in terms of contributing to the acceleration of housing delivery over the next 15 years.

Our client supports the call for sites and will make a submission in due course on same. In the interim, we would suggest that the call for sites should be used to inform the activation of the core strategy housing targets in the short term to 2028 for the remainder of the current Development Plan and beyond.

For the Planning Authority to realise the future growth requirements there needs to be a significant pivot in the short term in terms of strategy by the Planning Authority away from the long term strategic land banks to the smaller/medium sized sequentially serviced landbanks within towns such as NTK and our client's lands, particularly where there is an active developer willing to bring the site forward for development in the short-term, subject to an appropriate zoning context.

In terms of the proposed updates to the Core Strategy Table 3.5 of the Wicklow County Development Plan 2022-2028 under variation no. 6, our client is greatly concerned that the additional housing allocation of just 55 units in the period to 2031 is vastly insufficient and an underrepresentation of the demand for homes in NTMK having regard to its future growth and supply of land for housing and the availability of serviced Tier 1 land.

The allocation does not expressly include 50% headroom as advised by Policy Objective 2 of the NPF Implementation Guidelines and the Core Strategy does not set out targets beyond 2031 as provided for in the guidelines. Our client is also concerned that the approach set out in the proposed variation fails to anticipate and make adequate provision for additional zoned lands in the period beyond 2031 which should be addressed given the urgency for significant quantum of new homes as set out in the NPF Implementation Guidelines. The identification of sites could be included through the inclusion of zoning maps for the main settlements.

We note Appendix 1 of the guidelines requires a new minimum annual housing allocation of 2,068 units in county Wicklow in the period 2025-2034, equating to an additional 657 units per annum. Applying 50% headroom as advised by the NPF implementation guidelines, an allocation of 3,102 units would be required, equating to an additional 1,691 units per annum across the county.

We understand that Wicklow County Council has been instructed by the Minister for Housing, Local Government & Heritage and An Taoiseach to progress with making provision for the implementation of in excess of **3,000 units** per annum, in accordance with the NPF Implementation Guidelines to accommodate projected population growth in the county. It is therefore imperative that the proposed variation includes housing allocations to reflect this, net of any reductions arising from dwellings currently under construction and extant permissions which should be excluded from the calculations.

Under the Revised NPF there is a clear need to identify and zone additional land for future residential development in suitable locations (such as NTMK), in order to address the ongoing housing crisis / emergency, and Wicklow County Council will need to identify significant new areas for housing to assist in meeting a proportion of this growth in the County, working with the Minister for Housing, Local Government and Heritage (the Minister) to commence the process of updating the Core Strategy and to identify, unlock, and zone additional land in the County for residential development to ensure that the quantum of residential zoned land can accommodate the targets set out in the Revised NPF.

In this regard we refer to the letter of the 16<sup>th</sup> of May 2025 from the Minister to the Chief Executives of all City and County Councils (a copy of which is included at Appendix 2) which states that ***“Providing for the housing needs of our people is this Government’s top priority.”***, that ***“it is clear that we need to urgently accelerate our delivery of housing and this must be done at all levels of Government.”***<sup>1</sup> (emphasis added).

The Minister’s letter highlights the level of urgency required in to address the matter, stating that all Development Plans ***“must now be reviewed and updated to align with the Revised Framework as quickly as possible”***<sup>2</sup> (emphasis added).

The Minister letter requests that Planning Authorities make it an absolute priority to prepare for the review of the Development Plans required to reflect the revised housing targets set out in the NPF first Revision. In this regard the Minister’s letter requests that Planning Authorities

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<sup>1</sup> Minister for Housing, Local Government and Heritage letter to County Councils, 16<sup>th</sup> May 2025

<sup>2</sup> Minister for Housing, Local Government and Heritage letter to County Councils, 16<sup>th</sup> May 2025

identify suitable lands to accommodate the level of residential development required, having regard to deliverability and the availability of services, as a matter of urgency.

In this regard, we would note that services are available and that an upgrade to the Newtownmountkennedy pump station have recently commenced by Uisce Eireann which will as set out by Uisce Eireann “cater for the future growth and development of the Newtownmountkennedy area”.

We would highlight the following from CS Consulting Engineers in relation to services/roads in respect of our client’s lands:

**(a) Roads**

*The existing access road is located at the eastern boundary of the subject lands and provides vehicular and pedestrian access to the lands. The access road cross section includes a 2-way road, public lighting and footpaths either side. The access road (72m in length) is connected to the existing Monalin Road, which incorporates segregated cycle and pedestrian lanes. These active travel routes linking to the R765 and R772, thereby facilitating safe and efficient movement for all modes of transport to the lands to the N11 and the wider regional road network. The lands are currently served by a road network.*

**(b) Footpaths**

*The existing access road is located at the eastern boundary of the subject lands and provides vehicular and pedestrian access to the lands. The access road cross section includes a 2-way road and footpaths either side. The access road is connected to the existing Monalin Road, which incorporates segregated cycle and pedestrian lanes. These active travel routes linking to the R765 and R772, thereby facilitating safe and efficient movement for all modes of transport to the lands to the N11 and the wider regional road network. The lands are currently served by a footpath network.*

**(c) Cycleways**

*The existing access road is located at the eastern boundary of the subject lands and provides vehicular and pedestrian access to the lands. The access road cross section includes a 2-way road and footpaths either side. The access road is connected to the existing Monalin Road, which incorporates segregated cycle and pedestrian lanes. These active travel routes linking to the R765 and R772, thereby facilitating safe and efficient movement for all modes of transport to the lands to the N11 and the wider regional road network. The lands are currently served by a cycle network.*

**(d) Public Transport**

*2no. existing bus stops are located on the main road through Newtown Mount Kennedy on the R772 within a walking distance of less than 15 minutes from the site. These stops are served by Bus Éireann routes 131 and 133, and Go-Ahead Ireland route L1. Bus route no 131 operates between Bray Station and Wicklow and bus route no 133 operates between Dublin and Wicklow at 60-minutes AM peak hour intervals, while route L1 operates between Newtown Mount Kennedy and Bray Station and has an AM peak interval of 30 minutes, averaging of 2no. buses per hour. Travel time to Greystones train station and Kilcoole train station is approx. 15-minutes by private road.*

**(e) Foul Drainage**

*The existing access road located at the eastern boundary of the subject lands contains an existing 225mm diameter foul drain. This foul drain connects to an existing 225mm diameter foul sewer in Monalin Road to the east of the site, with a further 225mm diameter foul sewer located within the Glendarragh Estate to the southeast. This network discharges to the Newtown Mount Kennedy Wastewater Pumping Station, from which flows are pumped to the*

Greystones Wastewater Treatment Plant for treatment. Works are on site with Uisce Eireann to upgrade the plant to cater for future growth works complete December 2026.

**(f) Water**

The existing access road located at the eastern boundary of the subject lands contains an existing watermain ready for connection to the existing 150mm diameter HDPE watermain in Monalin Road to the east of the site. We understand from recent developments / developers in the area that there is capacity in the system to cater for the lands.

**(g) Surface Water**

The subject site benefits from an existing watercourse traversing along its northern boundary. All stormwater from the proposed development may be discharged into this existing watercourse along the northern boundary, subject to appropriate attenuation and flow control. All storm drainage from the proposed development shall be collected within a suitably designed attenuation system and discharged via a flow-controlled mechanism. The attenuation system would be designed to accommodate a 1-in-100-year storm event, including an allowance for climate change, in accordance with the requirements of the Wicklow County Development Plan 2022–2028.

Our client's recommendations are set out as follows:

**ITEM 1 – APPLY FULL 50% ADDITIONAL PROVISION TO CORE STRATEGY**

This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to provide 50% ‘additional provision’ over and above the housing growth requirement as directed by the Minister for Housing, Local Government & Heritage and An Taoiseach to meet the needs of the population across county Wicklow. The additional provision should exclude the existing dwellings under construction and extant permissions.

**ITEM 2 – EXTEND CORE STRATEGY TABLE TO 2034 AND 2040**

This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to include Housing Allocations to 2034 and 2040 as set out in the NPF Implementation Guidelines to ensure a consistent and clear approach and enable appropriate phasing of additional residential zoned lands beyond 2031 to avoid restricting the supply of new housing development.

**ITEM 3 – INCLUDE ADDITIONAL HOUSING ALLOCATIONS TO NEWTOWNMOUNTKENNEDY**

This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to include the 50% ‘additional provision’ in housing allocations in Newtownmountkennedy at a minimum. It is recommended that a minimum of 818 units are assigned to Newtownmountkennedy as the ‘New Housing Target 2025-2031’ in the period to 2022 - 2031 and an additional 540 units to 2034. It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction (366 no.) and therefore do not provide additional residential capacity as they are historic permissions.

Mrs. Ogilvy Watson owns lands extending to c. 6.3 hectares located at Monalin House, Newtownmountkennedy, to the south-west of the Season Park residential area and to the west of the R772 (Dublin–Wexford Road). These lands include a mix of OS1 – Open Space, CE – Community & Educational zoned lands under the Newtownmountkennedy LAP 2022-2028, with the southern part of the site existing as ‘white lands’ outside the current settlement boundary.

The lands are serviced, accessible and represent a logical and sequential location for the expansion of NTMK consistent with the requirements of the NPF Implementation Guidelines 2025. The northern section of the lands were previously zoned for Residential use in the NTMK Local Area Plan 2008 and therefore the value of the lands for the provision of residential development is established and in this regard, the lands should now be considered in assisting with achieving the updated Core Strategy figures for the current County Development Plan period to 2028 and beyond to 2034.

We understand Wicklow County Council will be issuing a ‘Call for Sites’ in due course following the current consultation on the revisions to the Core Strategy and associated housing targets etc. and our client welcomes the opportunity to make further submission in this respect in due course.

#### ITEM 4 RECOMMENDED EXCLUSIONS FROM CORE STRATEGY

**This submission recommends that the Council does not reduce the Core Strategy figures for the remainder of the County Development Plan for dwellings which are already under construction and therefore do not provide additional residential capacity as they are historic permissions.**

In addition, it is recommended that permitted units should also not be included as they were permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery. A significant proportion of permissions are not activated. Reasons for this include physical infrastructure such as roads and water, as well as social infrastructure such as schools and community facilities. In our experience many permissions will not be delivered during the plan period. The practice of continued use of extant permissions to reduce future housing targets should be discontinued.

## 2.0 LOCAL PLANNING POLICY

### 2.1 Core Strategy of Wicklow CDP 2022-2028

The Wicklow County Development Plan 2022–2028 (hereafter referred to as the CDP) provides the overall statutory framework for the development of County Wicklow and sets out the spatial development strategy for the county, which is organised around a defined hierarchy of settlements.

Newtownmountkennedy is identified in the CDP as a ‘Level 4 Self-Sustaining Town’, reflecting its role as a key growth settlement within east County Wicklow and its strategic location along the N11/M11 corridor within the Greater Dublin Area hinterland. The CDP recognises Newtownmountkennedy as an important residential and service centre that has experienced significant population growth in recent years, and which requires continued, coordinated investment in housing, employment, infrastructure and community facilities to strengthen its self-sufficiency. The CDP seeks to facilitate the town’s consolidation and sustainable expansion through compact, sequential growth, the revitalisation of the town centre, and the

provision of high-quality living environments supported by appropriate transport and social infrastructure.

### Figure 2.1:Core Strategy Table extract of the CDP 2022-2028

#### Level 4 Population Targets Q2 2028

LEVEL 4	2016	Q2 2028
Baltinglass	2,251	2,607
Enniskerry	1,877	2,106
Kilcoole	4,244	4,778
<b>Newtownmountkennedy</b>	<b>3,552</b>	<b>5,179</b>
Rathdrum	1,716	2,339

#### Level 4 Housing Unit Targets 2031

LEVEL 4	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
Baltinglass	903	46	40	85	24	195
Enniskerry	648	34	40	36	15	125
Kilcoole	1,451	97	20	140	30	287
<b>Newtownmountkennedy</b>	<b>1,222</b>	<b>250</b>	<b>100</b>	<b>433</b>	<b>99</b>	<b>882</b>
Rathdrum	669	132	100	68	31	331

The Core Strategy table identifies Total Housing Growth of 882 for Newtownmountkennedy in the development plan period 2016-2031. As demonstrated later in this submission, we understand that permissions for c. 366 units are under construction in Newtownmountkennedy, with a limited pipeline of permitted and proposed development, with a total of 825 units anticipated to be completed in the period 2016-2031 (assuming delivery of all extant permissions), falling short of the Housing Target set out in the Core Strategy.

It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction and therefore do not provide additional residential capacity as they are historic permissions.

### 3.0 CASE FOR BRINGING FORWARD LAND FOR RESIDENTIAL DEVELOPMENT

It is well documented that the population of the state is growing at a rate which is significantly higher than anticipated and not accurately reflected in the prevailing National Planning Framework or corresponding Development Plan Core Strategies. The Revised National Planning Framework was published in April 2025 in response to the results of the 2022 Census and the population projections prepared by the ESRI in August 2024. The government approved revised housing targets for the period 2025 to 2030, aiming to deliver a total of 303,000 new homes across Ireland. This includes an average of over 50,000 homes per year, with 'a pathway to achieve 60,000 homes annually in 2030 and thereafter'.

While we welcome the direction of these updates, it is paramount that the Council keep pace with the necessary updates to the Core Strategy and do not unduly restrict the delivery of houses in the area and provide sufficient flexibility to ensure the delivery of new homes over the next Development Plan periods.

### 3.1 NPF Implementation: Housing Growth Requirements (July 2025)

The NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities “*the Guidelines*” constitute Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) (“the Act”) and replace the Housing Supply Target Methodology for Development Planning (published in 2020.)

The Guidelines set out in the housing demand scenario to 2040 for each local authority, drawing upon a range of scenarios presented by the ESRI in 2024 to “*assist planning authorities in appropriately integrating the strategic national and regional population parameters into the statutory planning processes, such as the preparation of the city/county development plan and the preparation of the housing strategy.*”

#### Policy and Objective 1:

*“It is a policy and objective of these Guidelines that the housing growth requirements for each planning authority set out in Appendix 1 are reflected in the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.”*

Given the urgency of the housing crisis, planning authorities should commence the process of revising and varying the development plan against the policies and objectives of these Guidelines as quickly as possible.

Appendix 1 of the Guidelines outline the annual housing growth requirements and presented in an annualised format in the interests of clarity and having regard to the fact that development plans across the 31 planning authorities are at different stages.

#### Policy and Objective 2 states that up to 50% additional provision may be applied to in addition to the figures contained in Appendix 1:

*“It is a policy and objective of these Guidelines that ‘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, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments”. (JSA emphasis)*

For the purposes of these Guidelines, planning authorities should address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement set out in Appendix 1, in light of the urgent need to increase housing delivery and to optimise the ability to deliver on the housing requirements of the Revised NPF.

The justification for this additionality and the criteria for the selection of land and sites should be carried out in accordance with the existing provisions of the “Development Plans - Guidelines for Planning Authorities” (2022), as set out in Section 4.4.3 thereof - “*Ensuring Sufficient Provision of Housing Lands/Sites*”.

According to the Guidelines, the planning authority should undertake a Serviced Lands Assessment to identify zoned serviced/serviceable lands with residential development potential in all relevant settlements, specifying enabling infrastructure, for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, school provision and community facilities. This does not appear to have been completed by WCC to inform the proposed variation no. 6 as required by the Guidelines.

#### **4.0 COMMENTARY & RECOMMENDATIONS TO PROPOSED VARIATION NO. 6 OF WICKLOW CDP 2022-2028**

The Proposed Variation no. 6 of the Wicklow CDP 2022-2028 seeks to revise the Wicklow Core Strategy and associated housing targets, and a number of related housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement. We set out the following headings to address and provide recommendations to the content of the Core Strategy set out in the proposed amendments to Chapter 3 of the development plan.

##### **4.1 CORE STRATEGY AND LOW ACTIVATION/COMPLETION RATES**

The challenge to the delivery of housing is apparent in the housing completions as illustrated below.

It is noted that completions in Wicklow County Council at 5,502 units were c. 53% of the target of 11,028 (1,838 per annum) over the CDP period 2016-2022, resulting in a shortfall of 5,526 no. dwellings over that period. Therefore, the CDP clearly does not meet this key requirement to ensure that the CDP core strategy has made adequate provision for zoned and serviced sites that will come forward during the lifetime of the plan.

**Table 4.1: Total Housing Completions and Core Strategy Wicklow 2016-2022**

	2017	2018	2019	2020	2021	2022	Total 2016-2022
<b>Completions</b>	478	586	1,115	1,038	747	1,538	5,502
<b>WCC CDP Core Strategy 2016-2022</b>	1,838	1,838	1,838	1,838	1,838	1,838	11,028
<b>Difference/Shortfall</b>	-1,360	-1,252	-723	-800	-1,091	-300	-5,526

Source: CSO & JSA. Note Plan adopted in November 2016. Figures for 6 yrs 2017-2022.

It is noteworthy that for the current Development Plan period 2022-2028 the core strategy numbers for Wicklow decreased by 2,561 dwellings or c. 23% from 11,028 (1,838 per annum) for the 2016-2022 Plan to 8,467 dwellings (1,411 per annum).

For the period since the adoption of the 2022 Plan, we would note that completions were 1,428 in 2023, 1,338 in 2024 and 1,276 to Q3 in 2025 (CSO 2025). While this represents a noteworthy increase, the average across the first 3 years is less than 50% of the requirements of the Government which envisages c. 3,000 new dwellings for Wicklow County and which illustrates the challenges in meeting the delivery of units. In order to meet the challenging targets, the Council needs to harness all of the available zoned land and identify suitable sites, which can deliver in the short to medium.

Table 3.5 states that 2,768 units are under construction Q3 2025. While a few of these will be completed in 2025, the bulk will be completed in 2026. It is not really credible that houses permitted but not yet commenced 2,819 will be completed in 2026 so it is unlikely that 3,000 houses will be completed in 2026 either. This target of 3,000 houses P.A is only likely to be nearly met in 2026 because 447 were under construction in NTMK. Virtually, no further construction is planned in NTMK to 2031.

It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction and therefore do not provide additional residential capacity as they are historic permissions. At the very least we request that the 2,768 no. units currently under construction are omitted from the final core strategy table and the remaining core strategy housing targets adjusted upwards accordingly and directed towards areas of the county where the short-term growth can be readily accommodated such as our client's lands.

In addition, it is recommended that permitted units should also not be included as a large number of them were likely permitted under previous Core Strategy and indeed may not proceed. It is widely recognised that a significant proportion of permissions are not activated. Reasons for this include physical infrastructure such as roads and water, as well as social infrastructure such as schools and community facilities. In our experience many permissions will not be delivered during the plan period. The practice of continued use of extant permissions to reduce future housing targets should be discontinued.

On this basis, we would query whether all of the 2,819 extant permissions will be built over the period indicated and therefore should also be omitted from the final core strategy table and the remaining core strategy housing targets adjusted upwards accordingly. It is noted that the 2022 CDP outlined some 3,153 extant units.

We would note that the existing housing stock figures contained in table 3.3 includes 986 no. holiday homes. It is submitted that this quantum of housing serves no real purpose and essentially over-estimates the actual usable quantum of available housing for the residents of County Wicklow. We request that this figure of c. 1,000 units is added to the overall number of additional dwellings required.

We would query how realistic is it that planning permission will be granted for 12,054 new units in time for that number of houses to be completed by 2031. Planning permission for substantially more than 3,000 units per annum would need to be granted each year 2026 – 2029 and construction would need to commence on all of them in the next 2-3 years at the latest to meet the targets.

From table 3.5, of the 12,054 units which still need planning permission but are to be built by 2031 10,810 or 90% are to be in Bray, Wicklow- Rathnew, Arklow and Greystones – Delgany. The Q3 2025 construction in these 4 areas was only 981 or 35% of the total for the county figure of 2,768.

For the Planning Authority to realise the future growth requirements there needs to be a significant pivot in the short term in terms of strategy by the Planning Authority away from the long term strategic land banks to the smaller/medium sized sequentially serviced landbanks within towns such as NTMK and our client's lands, particularly where there is an active developer partner willing to bring the site forward for development in the short-term, subject to an appropriate zoning context.

#### **4.2 APPLY FULL 50% ADDITIONAL PROVISION TO CORE STRATEGY**

In the view of our client, it is imperative that Wicklow County Council utilise and apply the full 50% 'additional provision' as set out by Policy & Objective 2 of the NPF Implementation Guidelines for the county. Whilst the updated Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions set out in Table 3.5 of the proposed Core Strategy may include some additional provision, this does not make sufficient provision to accommodate the anticipated population growth in Wicklow in the period to 2031 and beyond to 2040.

It is a policy and objective of the Ministerial Guidelines that an '*additional provision*' of up to 50% over and above the housing growth requirement for each local authority is reflected within the County Development Plan.

Appendix 1 of the Housing Growth Guidelines 2025 requires a new annual housing allocation of 2,068 units in county Wicklow in the period 2025-2034, equating to an additional 657 units per annum. Applying 50% additional provision as advised by the NPF implementation guidelines, an allocation of 3,102 units would be required, equating to an additional 1,691 units per annum across the county.

Table 3.5 of the proposed variation allows for a housing target of some 17,098 between 2025 and 2031, which equates to just under 3,000 units per annum, reduced to 12,054 no. dwellings. However, this figure is reduced to c. 2,000 units per annum through the exclusion of current dwellings under construction and extant permissions. It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction and therefore **do not** provide additional residential capacity as they are historic permissions.

It is recommended that extant/permited units should also not be included in the core strategy as a large number of them were likely permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery. The practice of continued use of extant permissions to reduce future housing targets should be discontinued. This is discussed further in the sections below.

Furthermore, a significant quantum of existing residential zoned lands cannot deliver units at the necessary rate to meet the c. 3,102 units per annum housing target as can be seen historically across the county. The low implementation rate of dwellings on zoned residential lands has contributed to a substantial deficit in respect of core strategy housing targets of previous CDPs, as detailed further below. This highlights the need for WCC to identify additional serviced lands for the delivery of additional residential development as a matter of urgency to achieve the housing targets set out in the NPF Implementation Guidelines.

Under the Revised NPF there is a clear need to identify and zone additional land for future residential development in suitable locations (such as NTMK), in order to address the ongoing housing crisis / emergency, and Wicklow County Council will need to identify significant new areas for housing to assist in meeting a proportion of this growth in the County, working with the Minister for Housing, Local Government and Heritage (the Minister) to commence the process of updating the Core Strategy and to identify, unlock, and zone additional land in the County for residential development to ensure that the quantum of residential zoned land can accommodate the targets set out in the Revised NPF.

In this regard we refer to the letter of the 16<sup>th</sup> of May 2025 from the Minister to the Chief Executives of all City and County Councils (a copy of which is included at Appendix 2) which

states that “**Providing for the housing needs of our people is this Government’s top priority.**”, that “*it is clear that we need to urgently accelerate our delivery of housing and this must be done at all levels of Government.*”<sup>3</sup> (emphasis added).

The Minister’s letter highlights the level of urgency required in to address the matter, stating that all Development Plans “**must now be reviewed and updated to align with the Revised Framework as quickly as possible**”<sup>4</sup> (emphasis added).

The Minister letter requests that Planning Authorities make it an absolute priority to prepare for the review of the Development Plans required to reflect the revised housing targets set out in the NPF first Revision. In this regard the Minister’s letter requests that Planning Authorities identify suitable lands to accommodate the level of residential development required, having regard to deliverability and the availability of services, as a matter of urgency. This should be undertaken by the preparation of a Serviced Land Assessment as required by the NPF Implementation Guidelines. This does not appear to have been completed by WCC as part of proposed variation no. 6 and is necessary to identify suitable serviced lands which can accommodate additional residential development in the short term.

We note the Wicklow County Council Meeting held on 3<sup>rd</sup> November 2025 and published minutes on the Council’s website. This included discussion on WCC’s recent meeting with the Taoiseach, the Tánaiste, the Minister for Housing and Minister for State and Housing in relation to additional delivery of housing within the county and the targets that have been set for Wicklow by the NPF Implementation Guidelines. In this respect, the Chief Executive noted during the meeting that:

*“We have now been asked at that meeting on Thursday to increase again. I think our housing target was 2,084 per annum, Minister Cummins says he wants us to deliver more than 3,000 units per year”. (JSA emphasis)*

This target of over 3,000 units per annum aligns with the inclusion of 50% additional provision to the figure of 2,068 units per annum as set out in Appendix 1 of the guidelines. Importantly, we note that in the meeting with WCC, the Taoiseach advised the Chief Executive that “*you zone land, we’ll deliver the infrastructure*”. This is clear commitment from the Government to WCC that the delivery of more than 3,000 units per annum will be facilitated by the necessary infrastructure.

The meeting transcript also notes that WCC have been “*asked to look at additional zoning that’s serviced around the county*”,. This confirms that existing serviced lands should be identified, sought out and brought forward for development in the short term to meet the target per annum set out in the figures in Appendix 1 plus the 50% additional provision included in Policy & Objective 2 of the NPF guidelines.

It is submitted that the reliance of Wicklow County Council on such Tier 2 sites or sites which are effectively Long-Term Strategic and Sustainable Development Sites/Opportunity Areas’ is contrary to the correct application of the Section 28 NPF Implementation Guidelines which clearly state that these long term development sites/opportunity areas “*may be considered as further ‘additional provision’ over and above the baseline housing growth requirements*” (JSA emphasis added).

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<sup>3</sup> Minister for Housing, Local Government and Heritage letter to County Councils, 16<sup>th</sup> May 2025

<sup>4</sup> Minister for Housing, Local Government and Heritage letter to County Councils, 16<sup>th</sup> May 2025

From the above, it is evident that the S28 Guidelines recognise the challenge in short term delivery and are clearly requiring that the Long-Term Development Sites to be considered as “the up to 50% ‘additional provision’ referenced above” with “further additional provision” required in addition to the “50% additional provision”.

In light of this we urge WCC to take the opportunity to rectify the core strategy numbers and allocate additional core strategy provisions to towns such as NTMK which have the necessary infrastructure already in place to deliver much needed housing.

This may entail some of the lands in the Long-Term Strategic Sites (Tier 1) being brought forward quicker as “additional provision” where they can be serviced while other lands which are clearly Tier 2 will revert to being “further additional provision”, which would be over and above the additional core strategy growth.

This approach is further confirmed and outlined in the Section 28 Guidelines which state that there should be a “particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan.”

It would also be in compliance with NPO 101 of the NPF which requires that *“Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.”*

Furthermore, the Guidelines encourage that the assessment of the availability of lands to come forward for development within the remaining period of the plan *“should take into account factors including the planning history of zoned lands and activation of sites, and the availability of or potential for servicing.”*

Crucially the S28 Guidelines state that *“Where the planning authority considers that lands may not come forward for development within the remaining period of the existing plan, it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium term.”* (JSA emphasis added).

As the remaining plan period is only three years, it is considered necessary that other alternative sites capable of delivering housing in the short-term are brought forward to allow residential development in the Proposed Variation No. 6 to ensure these targets can be met. This should be facilitated through the identification of additional residential lands which can accommodate residential development in the short term.

The recently published Delivering Homes, Building Communities 2025-2030, emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

*“...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.”*

The implementation of the full 50% additional provision will assist in achieving the delivery of 300,000 new homes up to 2030.

We note that Table 3.4 of the revised Future Housing Capacity Wicklow in the proposed variation identifies the potential for 5,555 new dwellings on 'Phase 2/Priority 2' zoned lands across the county. Our client has serious concerns regarding the ability of these lands to contribute to overall housing allocation targets per annum in the period to 2031. It is unreasonable to expect that the full quantum of the potential capacity of these Phase 2 lands can be realised in the short term typically owing to site-specific constraints infrastructure constraints and other factors.

As discussed further below, significant housing delivery in NTMK has taken more than 15 years in the case of some sites, with permissions initially secured in 2008 and 2009 still being implemented today. This highlights the delays with the construction of units and the uncertainty related to this. Furthermore, recent Government statistics indicate that c. 69% of planning permissions secured for residential development in the period 2023-2024 actually commenced and completed, highlighting the significant gap between securing permissions and delivery on the ground. By zoning sufficient lands to provide for 3,102 units per annum in the period to 2034, based on recent statistics on implementation and delivery of permissions, we might reasonably expect c. 2,140 units to be implemented across the county. This is only marginally above the baseline New Annual New Housing Growth Requirement to 2034 figure of 2,068 identified for Wicklow County Council in Appendix 1 of the NPF guidelines, assuming that permission is granted for residential development on zoned lands and delivered at a rate of 69%.

In this respect, it is essential that the Council's Core Strategy make provision for the implementation of 3,102 units per annum to have a chance of achieving the requirements of the NPF guidelines having regard to the lower delivery and implementation of residential permissions on the ground to that permitted.

We note the submission of the Office of the Planning Regulator to the Kildare County Council consultation on the NPF Implementation Guidelines and via variation no. 3 of the County Development Plan including amendments to the Core Strategy. The OPR's comments relate directly to the challenges with the delivery of existing Phase 2 lands and the requirement for additional Tier 1 / Phase 1 lands to be zoned to meet demand in the short term i.e. the remaining development plan period and out to 2031:

*"Where the Planning Authority considers that lands may not come forward for development within the remaining period of the plan, the Housing Growth Guidelines (section 3.1) state that it may be necessary to consider the zoning of alternative lands where there is capacity to deliver housing in the short to medium-term."*

*Accordingly, the Office recommends that the Planning Authority consider options to bridge this delivery gap until these constrained lands become available. This may include zoning additional residential lands that are not so infrastructurally constrained or specifying opportunities for parts of these landbanks to be brought forward earlier."*

In this respect, significant areas of Phase 2 lands across county Wicklow as identified in Table 3.4: Future Housing Capacity Wicklow of the proposed variation may be considered similar to constitute a similar scenario to Kildare, and that WCC may be directed by the OPR in due course to bring forward additional serviced 'Tier 1' lands as per Appendix 3 of the NPF 2018 to bridge the delivery gap in the short term. We note significant 'Phase 2 / Priority 2' lands in Wicklow-Rathnew (1,137 units), Arklow (2,049 units), Greystones-Delgany (1,570 units), Blessington (501 units) and Kicoole (298 units) which are noted to contribute to the overall supply of residential units in the period to 2031. It is not considered realistic to anticipate that

5,555 units (or 25%) of an overall housing target of 22,067 units to come forward on Phase 2 lands which are identified as being constrained by an absence of infrastructure or other impediment.

Furthermore, it is submitted that the reliance of Wicklow County Council on 'Phase 2 / Priority 2' sites or sites which are effectively '*Long-Term Strategic and Sustainable Development Sites/Opportunity Areas*' is contrary to the correct application of the NPF Implementation Guidelines. The guidelines clearly state that these long-term development sites/opportunity areas "*may be considered as further 'additional provision' over and above the baseline housing growth requirements and the up to 50% 'additional provision' referenced above*". The proposed variation to the Core Strategy and revised Housing Growth Targets have not accounted for this therefore is inconsistent with current Government policy in this regard and should be addressed. Therefore, additional 'Phase 1' / 'Tier 1' zoned lands are required to be identified by the Council to meet the requirements of the guidelines and plan accordingly for growth across the county. This will help to meeting housing demand and anticipated population growth in Wicklow in the short term to 2031 and beyond to 2040.

Page 14 of Chapter 3 of the proposed variation specifically states in respect of the quantum of zoned lands currently within the county as set out in Table 3.4:

*"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)."*

Therefore, in order to facilitate housing growth beyond 2031, the variation to the Core Strategy must provide for the higher figure of 50% additional provision as set out in Policy & Objective 2 of the NFP guidelines up to 2040.

Whilst it appears unclear (and unstated in the Core Strategy), an initial calculation suggests that the overall Core Strategy figures for the period to 2031 may include limited additional provision on the figure of 2,068 set out in Appendix 1 of the guidelines up to 2031. We submit that the Revised Housing Growth Targets and how these have been arrived is set out clearly in the Core Strategy and the additional provision clarified.

It is also noted that Table 3.5 appears to include 267 units across the county currently subject to appeal or judicial review. It is recommended that these units be excluded from the calculations until such times as these applications are granted or a positive judgment issued in the High Court.

It is therefore recommended that the Council apply the full 50% 'additional provision' net of the dwellings under construction and the extant permissions, to the Core Strategy Revised Housing Growth Targets for County Wicklow to ensure housing needs are met and sufficient supply is provided to meet demand across the county.

#### 4.3 EXTEND CORE STRATEGY TABLES TO 2034 AND 2040

Table 3.4 Future Housing Capacity Wicklow and Table 3.5 Wicklow Core Strategy (Revised Housing Growth Targets for Wicklow) should be extended beyond 2031 to 2034 and 2040 in accordance with the requirements of the NPF guidelines. Section 2.4 of the guidelines state the following in respect of the Tiering and Phasing of Land:

*“The application of these Guidelines, including both the updated housing growth requirements and the need for additionally over and above, and the future legislative requirement under the Act of 2024 to plan for longer term, 10-year development plan periods, will require planning authorities to consider how to address zoning and phasing over this longer arc of development.”*

It is clear that in order to inform and address zoning and phasing as required by the guidelines, the Core Strategy tables should be extended beyond 2031 and take account of the forthcoming provisions of the Act 2024 which will implement 10-year development plan periods.

Specifically in relation to development plan variations on foot of the guidelines, this advises:

*“Whether varying the current adopted development plan, reviewing the development plan under the Act of 2000 or preparing a 10-year development plan under the Act of 2024, planning authorities should consider as an immediate priority the suitability of lands for development over a 12 year plus period (to encompass the remaining period of the current adopted plan and the lifespan of the new 10-year development plan).”*

While it is noted that Table 3.1 of the Core Strategy sets out Housing Targets for County Wicklow 2025-2040, this simply includes the figures set out in Appendix 1 of the guidelines in the periods 2025-2034 and 2034-2040 and states a new housing target of 26,266 units for the period Q1 2025 – Q4 2040. There is no mention of the application of additional provision to these totals.

It is respectfully requested that the Core Strategy Table 3.5 should be include additional columns to set out ‘New housing target 2031-2034(units)’ and ‘New housing target 2034-2040 (units)’. These columns should include the 50% ‘additional provision’ as required by the NPF guidelines to ensure that there is a reasonable possibility for the county to meet its housing demand through an adequate and consistent supply of new units. Failure to apply the full 50% additional provision will serve to hinder the implementation of the NPF guidelines figures and facilitate the population growth anticipated in the county having regard to the uncertainty over the completion of residential permissions.

It is vital that the Core Strategy table incorporates projections for housing beyond 2031 to enable the identification of the appropriate quantum of lands suitable to meet the requirements of the NPF implementation guidelines including 50% additional provision.

#### **4.4 INCLUDE ADDITIONAL HOUSING ALLOCATIONS TO NEWTOWNMOUNTKENNEDY**

Additional residential zoned lands will be required in Newtownmountkennedy to ensure that sufficient lands are available to meet the growing population and the increased targets accruing from the updated National Planning Framework (NPF) 2025 consistent with the provision for an additional 50% head room above the Annual Housing Requirement for Wicklow set out in the NPF Implementation Guidelines.

The revised National Planning Framework (NPF) projects that Ireland’s population will increase by approximately 950,000 people between 2022 and 2040, generating demand for

around 50,000 additional households per annum nationally over that period. The NPF promotes a more balanced pattern of regional development, with growth distributed across all three regions comprising the Eastern and Midland, Southern, and Northern & Western to ensure more sustainable settlement and employment patterns. Within this context, County Wicklow, and particularly strategically located settlements such as Newtownmountkennedy, are expected to play an important role in accommodating population and housing growth within the Greater Dublin Area hinterland. The town's proximity to the N11/M11 corridor and its established residential base position it to contribute meaningfully to the delivery of compact, well-serviced housing in line with national and regional growth objectives.

Table 3.3 of the Core Strategy states the following rationale for the Housing Growth target set out for Newtownmountkennedy:

*“Newtownmountkennedy is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Newtownmountkennedy is well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County.”* (JSA emphasis)

The 2022 Census recorded a population of 3,539 in Newtownmountkennedy an increase of 31.9 % since 2011. To align with the NPF's compact growth objectives and to meet the projected housing demand, additional residentially zoned lands will be required in suitable and sequentially located areas of the town. The Government's commitment under the revised NPF to deliver compact and sustainable growth, including at least 40% of all new homes within existing settlements, reinforces the need for plan-led and serviced sites that can deliver housing efficiently and sustainably.

We note that the Core Strategy Table for the 2016-2022 states total housing requirement of 2,539 by 2025 at a growth rate of 1,461 between 2011 and 2025, 1,840 including headroom. This is notably above the Housing Target for NTMK set out in Table 3.3 of the proposed variation 6 for 2031 which is stated as 2,378. This is not commensurate with the population growth which the town has experienced in recent years and should be revised to reflect the rapid growth of the town and its anticipated growth in future given the town's location and ability to accommodate additional housing to serve the northern part of the county as set out in Table 3.3 to align with NPO7 of the National Planning Framework.

An extract of Table 2.8 of the Wicklow CDP 2016-2022 is included below:

Table 2.8 Wicklow LAP Settlements – Housing and Zoning Requirements

Future Plan Type	Settlement	Population 2011	Housing Stock 2011	Core Strategy Population Allocation 2025	Total Housing Unit Requirement 2025	Housing Unit Growth Requirement 2011-2025	Housing Unit Growth Requirement + headroom <sup>6</sup>	Housing Yield of existing zoned land <sup>7</sup>	Shortfall/ surplus (UNITS)	Method of addressing shortfall / surplus
LAP	Bray	29,339	11,518	38,119	17,651	6,133	7,934	4,689	-3,245	<b>Note 1</b>
LAP	Wicklow – Rathnew	13,468	5,399	22,141	10,252	4,853	6,272	5,640	-632	Future LAP
LAP	Arklow	13,066	5,459	21,247	9,838	4,379	5,726	4,000	-1,726	Future LAP
LAP	Greystones – Delgany	17,208	6,637	22,801	10,558	3,921	5,034	3,767	-1,267	Future LAP
LAP	Blessington	4,780	1,865	7,020	3,251	1,386	1,782	1,840	+58	Future LAP
LAP	Newtownmountkennedy	3,073	1,078	5,483	2,539	1,461	1,840	1,706	-134	Future LAP
LAP	Kilcoole	4,063	1,402	4,835	2,239	837	1,030	782	-248	Future LAP
LAP	Rathdrum	1,638	657	3,171	1,469	812	1,045	1,089	+44	Future LAP

This compares to the existing Housing Units Targets for 2031 as set out in the current Core Strategy in the Wicklow CDP 2022-2028, as shown below. This anticipates a population of 5,179 in NTMK in 2028, below that of 5,483 assigned under the 2016 CDP.

**Level 4 Housing Unit Targets 2031**

LEVEL 4	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
Baltinglass	903	46	40	85	24	195
Enniskerry	648	34	40	36	15	125
Kilcoole	1,451	97	20	140	30	287
<b>Newtownmountkennedy</b>	<b>1,222</b>	<b>250</b>	<b>100</b>	<b>433</b>	<b>99</b>	<b>882</b>
Rathdrum	669	132	100	68	31	331

By assessing the Housing Stock figures in the table above, it can be determined that **144** units were delivered between 2011 and 2016, with an additional c. **264** units delivered between 2017 and Q2 2022, providing a total of c. **408** completions between 2011 and 2022.

According to Table 3.3: Targeted Settlement Growth 2022-2031 and Table 3.4: Future Housing Capacity Wicklow of the proposed variation no. 6, **347** units were delivered between Q3 2022 and 2025 (892 – 545). Taken together, this equates to **755** units delivered between 2011 and 2025, falling significantly short of the Housing Growth Requirement of **1,840** units (including headroom) as set out in Table 2.8: Housing & Zoning Requirements of the 2016 CDP included above, which also identified a shortfall of 134 units in NTMK which require additional zoned lands to accommodate.

In this regard, it can be established that a deficit of c. **1,085 units** currently exists in 2025 in NTMK based on the analysis of the previous CDP Core Strategy figures and delivery on the ground in NTMK between 2011 and 2025. While it is acknowledged that the current Core Strategy plans for a population of 5,179 in 2028, below the 2016 CDP target of 5,483 in 2025, a substantial deficit continues to exist having regard to recent population growth and the requirements of the NPF Implementation Guidelines.

This deficit should be recognised and factored into the revised housing growth requirements set out in Table 3.5: Core Strategy of the proposed variation no. 6.

The following tables set out the status of existing residential and town centre zoned lands in Newtownmountkennedy from a recent JSA survey.

**Table 4.2: Assessment of Residential Zoned Lands Newtownmountkennedy**

Assessment of Residential Zoned Lands Newtownmountkennedy			
RN 1 (Moneycarroll)	c. 57 remaining / under construction (161 granted)	c. 2.4 hectares	211000 (Parent) Commencement issued 05/04/2024 2460321 (Amendment, additional 2 units)

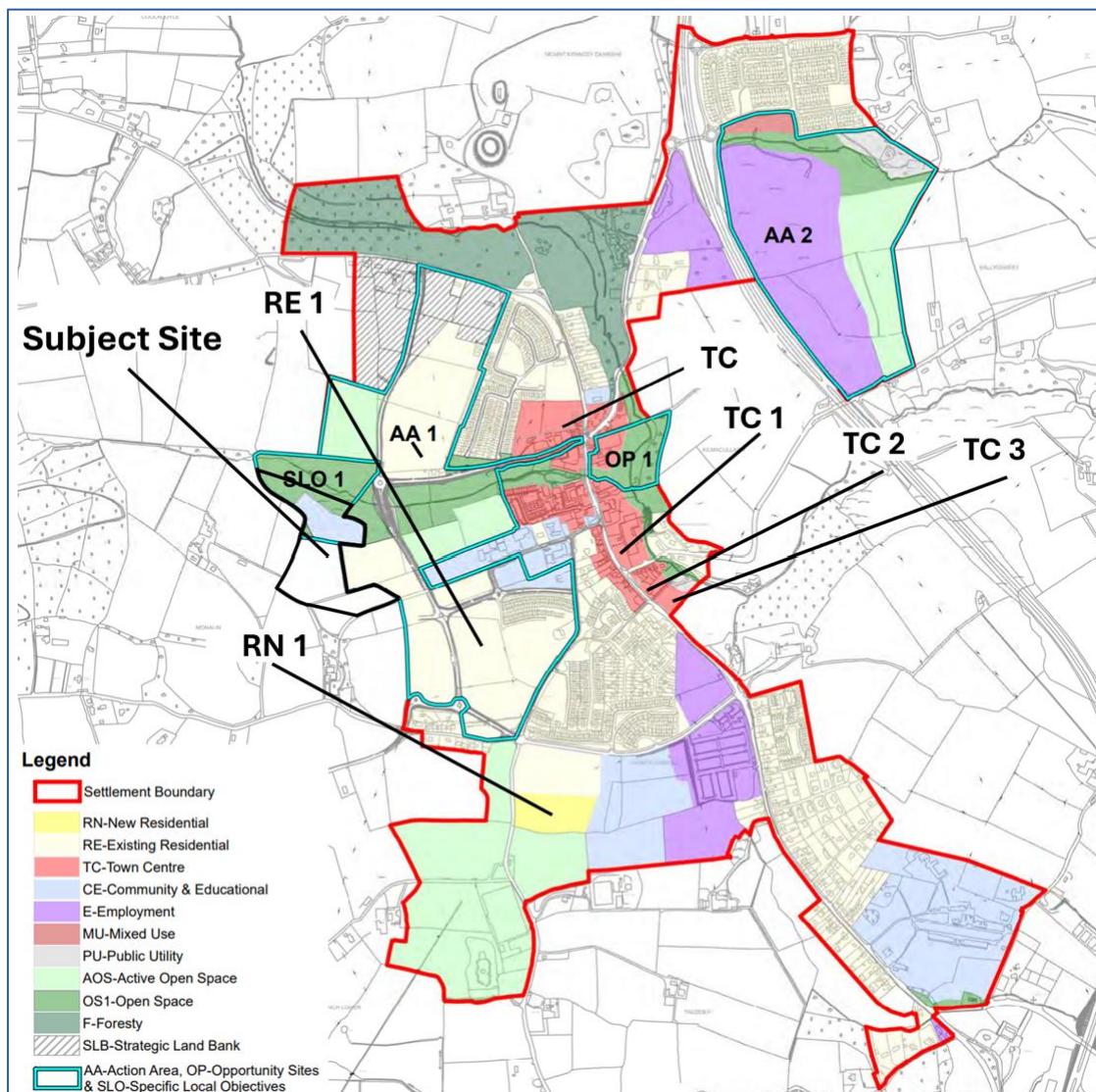
			Commencement issued 30/09/2024 Under Construction
AA 1 (Kineada / DRES Altidore Gardens)	c. 210 remaining / under construction (488 granted)	c. 7.95 hectares	24154 (LRD Amendment to 066101 permission increase to 751 units)  Under construction
RE 1 (Barley Field)	45	c. 1.74 hectares	17740 (Commencement Issued 20/03/2018)  Construction Completed
Total Permitted	694		
Total Under Construction/Complete	312		

It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction and therefore **do not** provide additional residential capacity as they are historic permissions.

**Table 4.3: Assessment of Recent Residential Development on Town Centre Zoned Lands Newtownmountkennedy**

Site Reference				
TC 1 O'Dwyer Site (Opposite Eugenes Store)	41	c. 0.33 hectares	21731/ACP 314323- 22 Under Construction	
TC 2 (Druid Well Pub Site)	5	c. 0.21 hectares	24377 Amendment to 22612 permission Not yet commenced	
TC 3 (Site Beside Druid Well Pub)	27	c. 0.66 hectares	23175 Permitted Not yet commenced	
TC 4 (Church Hill)	58	c. 1.57 hectares	211005 Under construction	
Total Permitted	131			
Total Under Construction/Constructed	99			

**Figure 4.1: Land-use zoning map of the Newtownmountkennedy LAP 2024-2030**



Source: Wicklow County Development Plan 2022-2028

As set out in Table 4.1 and 4.2, above there are a total of 694 dwellings either completed or under construction on existing residential zoned lands, with an additional 99 units completed or under construction on town centre zoned lands, equating to 793 units, with an additional 32 units permitted. This broadly equates to the implementation of c. **755** units between 2011 and 2025 as discussed above.

We note that a total of 751 units were granted under historic permission Reg. Ref.: 066101 at Kineada / Altidore Gardens in 2008 (as extended and amended) which is nearing completion. Separate to this significant development, a total of 161 units are provided at Moneycarroll (with parent permission Reg. Ref.: 081426 granted in 2009), with an additional 45 units at Barley Field permitted in 2017 (Reg. Ref.: 17740). This demonstrates the very lengthy and substantial lead-in times for the delivery of these permissions across three development plan periods. In this regard, it is clear that recently completed residential development or that still under construction continues to address the Core Strategy Housing Requirements set out under previous development plans and should not be assigned to the current 2022-2028 and 2022-2031 Housing Growth Targets set out in the Core Strategy of the proposed variation no. 6. In this respect, it is considered that an element of 'double counting' exists in the case of permissions being implemented in NTMK, with a significant number of these units contributing to a deficit under the core strategy of previous CDPs.

Furthermore, we highlight that Table 3.1 of the NTMK Town Plan identifies c. 646 potential / permitted no. of units on residential zoned lands, which demonstrates a shortfall in the ability to deliver 882 units which is the current Housing Target for NTMK to 2031.

**Table 3.1 Residential zoning provisions**

Location/Description	Area (ha)	Zoning	Potential / permitted No. of Units
<b>Kineada (north of river)</b>	8.5	RE	337
<b>Kineada (south of river)</b>	1	RE	37
<b>Kineada (Roundwood Road)</b>	0.5	RE	15
<b>Kineada (west of new road)</b>	6.3	RE	97
<b>Moneycarroll (N)</b>	3.2	RE	101
<b>Moneycarroll (S)</b>	2.25	RN	59
<b>Season Park (E)<sup>5</sup></b>	3.9	SLB	n/a
<b>Season Park (W)<sup>9</sup></b>	5.3	SLB	n/a
<b>Total</b>			<b>646</b>

It is important to note that the zoning map for NTMK includes only a single 'RN – New Residential' zoned at Moneycarroll South where a balance of 57 dwellings are under construction. The remaining residential zoned lands are 'RE – Existing Residential' which highlights the requirement for additional 'RN – New Residential' zoned lands in Newtownmountkennedy to accommodate future growth beyond the current plan period and out to 2034 and 2040 in accordance with the NPF Implementation Guidelines.

Therefore, it is clear that additional serviced and accessible zoned lands are required to be zoned to address the established deficit of 1,085 units in the period 2011-2025 (based on the 2016 CDP Core Strategy), as well as meeting the existing Housing Target of 882 to 2031 and the proposed Housing Growth of 892 up to 2031. The Housing Growth set out in Table 3.3 of the proposed Core Strategy therefore does not reflect recent delivery within NTMK in the context of the deficit accrued under the 2016 Core Strategy or the inclusion of 50% additional provision and should be adjusted accordingly.

Table 3.5: Revised Housing Growth Targets for County Wicklow includes an additional 55 units for delivery in NTMK in the period 2025-2031. This is entirely inappropriate and a significant underestimation of the reality of housing demand and population growth in the town.

Assuming a population of 5,179 in 2028 (as per the extant CDP population targets) and a further growth of c. 15% in the pursuant 3 years to 2031, a population of c. 5,955 may be anticipated. Based on an average household size of 2.5, this would equate to a housing stock of c. 2,382 in 2031, requiring a Housing Growth of 896 between 2022 and 2031. Including the 50% additional provision as advised by the NPF implementation guidelines over the years 2025 to 2031, this equates to 1,210 units required to 2031, as set out below:

Level	Town	Housing Stock	Housing Growth 2022-2031
4	NTMK	1,486	1,210

In this respect, Table 3.5 should be amended to provide for a minimum of 818 units assigned to Newtownmountkennedy as the 'New Housing Target 2025-2031' in the period to 2022 - 2031 with an additional 540 units to 2034.

These figures are conservative, having regard to the existing deficit observed in housing delivery in the period 2011 to 2025 with just c. 755 units completed in this time period, falling significantly short of Core Strategy housing growth targets over this period as set out in previous development plans.

This highlights the significant lead-in times and uncertainty around commencements and delivery of planning permissions. In this respect, it is imperative that WCC assign 50% additional housing provision to NTMK, which should be considered alongside the existing deficit established across previous plan periods and the continued rapid population growth in NTMK.

Accordingly, it is considered both logical and necessary to identify and include additional Phase 1 zoned lands for residential development in order to ensure delivery of new housing within a serviced, sequential, and sustainable location in the short term to 2031. This will directly support the future Core Strategy objectives of the County Development Plan and contribute meaningfully to meeting Newtownmountkennedy's projected population and housing demand, in line with national and regional policy for compact, infrastructure-led growth and the requirements of the NPF Implementation Guidelines.

#### 4.4.1 Commentary on Table 3.4

Table 3.4 outlines the future housing capacity for Wicklow (for Level 1-6 settlements). We would question the phasing and priority assigned to the towns for the column which relates to "*of which is subject to Phase 2/ Priority 2 designation*". The footnote states that where '0' is stated, this means that no land is subject to the Phase 2 / Priority 2 designation – all lands is 'Phase 1'.

From a review of table 3.4 it is respectfully submitted that greater clarity is provided in respect of the terminology. While recent Planning Frameworks within the administrative area of Wicklow, have introduced the concept of Phase 1/Phase 2 lands, it is important that the core strategy and the future housing capacity is clear on what lands that (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the plan (as per NPO 101) which states:

*"Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan."*

Currently the table suggest that the entirety of the zoned land in Bray is serviceable which is clearly not the case as the zoned land in Bray is reliant to a substantial degree on the long term development site at Fassaroe which while some development will likely come on stream in the short term, the site would be expected to deliver a long term stream of development

over a series of development plans due to the infrastructural deficits and unlikely to deliver any meaningful contribution to the core strategy for the remaining 3 years of the current Development Plan period to 2028.

This is acknowledged in the footnote of table 3.4 which states that the lands are “serviceable by 2031”, which is clearly outside the current development plan period. As outlined in the Infrastructural Assessment of the current plan (Appendix 9) the lands relating to the strategic sites (Fassaroe and Golf Club) are Tier 2 lands arising from a wide range of strategic transportation upgrades.

As such it is incumbent on the Planning Authority to ensure that the core strategy tables are adjusted so that existing serviced landbanks such as our client’s at Monalin, Newtownmountkennedy can be included in the future housing growth allocation for NTMK.

## 5.0 SUBMISSION REQUESTS

Having regard to the foregoing zoning and planning history, and emerging national and regional policy, particularly the Revised National Planning Framework (NPF) and the need to plan for an annual housing output of 50,000 units, this submission sets out the following key requests in respect of proposed variation 6.

These requests are made to ensure the Core Strategy of the Wicklow CDP 2022-2028 responds appropriately to national housing targets, provides for the development of sequential lands, and strategically located landbanks for future use, and ensures housing demand is met across the county.

### 5.1 ITEM 1 – APPLY FULL 50% ADDITIONAL PROVISION TO CORE STRATEGY

**This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to provide 50% ‘additional provision’ over and above the housing growth requirement as directed by the Minister for Housing, Local Government & Heritage and An Taoiseach to meet the needs of the population across county Wicklow. The additional provision should exclude the existing dwellings under construction and extant permissions.**

This is required to ensure that Wicklow provides adequate housing supply to meet the needs of the population growth of the county and aligns with the requirements of the Minister and An Taoiseach. The planning authority has been advised that making provision for the delivery of over 3,000 units in the period 2025 to 2031. It is respectfully submitted that the revised Core Strategy sets out clearly the inclusion of 50% additional provision within Housing Growth targets to facilitate completion of 3,102 units per annum as instructed by the government.

### 5.2 ITEM 2 – EXTEND CORE STRATEGY TABLE TO 2034 AND 2040

**This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to include Housing Allocations to 2034 and 2040 as set out in the NPF Implementation Guidelines to ensure a consistent and clear approach and enable appropriate phasing of additional residential zoned lands beyond 2031 to avoid restricting the supply of new housing development.**

It is respectfully requested that the Core Strategy Table 3.5 should be include additional columns to set out 'New housing target 2031-2034(units)' and 'New housing target 2034-2040(units)'. These columns should include the 50% 'additional provision' as required by the NPF guidelines to ensure that there is a reasonable possibility for the county to meet its housing demand through an adequate and consistent supply of new units.

Failure to apply the full 50% additional provision will serve to hinder the implementation of the NPF guidelines figures and facilitate the population growth anticipated in the county having regard to the uncertainty over the completion of residential permissions.

### 5.3 ITEM 3 – INCLUDE ADDITIONAL HOUSING ALLOCATIONS TO NEWTOWNMOUNTKENNEDY

**This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to include the 50% 'additional provision' in housing allocations in Newtownmountkennedy at a minimum. It is recommended that a minimum of 818 units are assigned to Newtownmountkennedy as the 'New Housing Target 2025-2031' in the period to 2022 - 2031 and an additional 540 units to 2034. It is recommended that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction (366 no.) and therefore do not provide additional residential capacity as they are historic permissions.**

From the analysis included above, it is clear that permissions granted and residential completions have fallen significantly below the Core Strategy Housing Growth targets set out for NTMK in the period 2011-2025, with a significant deficit currently existing. Long lead-in times and protracted construction periods have resulted in an element of double counting of permissions on residential zoned lands, contributing further to the existing and cumulative housing need in the town.

The Housing Growth set out in Table 3.3 of the proposed Core Strategy therefore does not reflect recent delivery within NTMK in the context of the deficit accrued under the 2016 Core Strategy or the inclusion of 50% additional provision and should be adjusted accordingly. The proposed figures are conservative and based on the assumptions of 30% population growth in NTMK in the period to 2034. In reality, additional provision will be required and additional Phase 1 / Tier 1 lands are urgently required to meet the future needs of a growing population.

### ITEM 4 RECOMMENDED EXCLUSIONS FROM CORE STRATEGY

**This submission recommends that the Council does not reduce the Core Strategy figures for the remainder of the County Development Plan for dwellings which are already under construction and therefore do not provide additional residential capacity as they are historic permissions.**

In addition, it is recommended that permitted units should also not be included as they were permitted under previous Core Strategy and indeed may not be constructed due to viability issues or other infrastructural constraints in delivery. A significant proportion of permissions

are not activated. Reasons for this include physical infrastructure such as roads and water, as well as social infrastructure such as schools and community facilities. In our experience many permissions will not be delivered during the plan period. The practice of continued use of extant permissions to reduce future housing targets should be discontinued.

## 6.0 CONCLUSIONS

Our client, Mrs. Barbara Ogilvy Watson, welcomes the opportunity to make submission on the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028.

As has been set out above, the Core Strategy is required to reflect and incorporate the full 50% additional provision in housing growth in the period to 2031 and beyond to 2034 and 2040 to align with the requirements of the NPF Implementation Guidelines and the direction of An Taoiseach and the Minister for Housing.

Ambitious housing growth targets must be included to enable the adequate delivery of residential development when considered in the context of current trends of implementation of permissions and completions on the ground which continually result in shortfalls in respect of Core Strategy targets across development plan periods. In this regard, the identification and bringing forward of Phase 1 / Tier 1 lands for development in the short term to 2031 is imperative to enable housing targets to be met.

We respectfully request that the recommendations set out within this submission are considered in Variation 6 of the Wicklow County Development Plan in relation to revised Core Strategy for County Wicklow.

We would be pleased to discuss this submission or the lands to which it relates, should the Council have any queries.

Yours faithfully,



**John Spain Associates**