

	<h1>Variation No.6</h1>
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Who are you:	Agent
Name:	Silverbow Limited
Reference:	VAR6-101501
Submission Made	January 16, 2026 10:16 AM

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

- Chapter 1 – Proposed Variation No. 6
- Chapter 3 – Proposed Variation No. 6
- Chapter 6 – Proposed Variation No. 6

Write your observations here:

Please see attached submission

Upload a File (optional)

Silverbow Ltd. WCDP Variation 6.pdf, 0.24MB

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

16 January 2026

**Re. Proposed Variation No. 6**

Dear Sir/Madam,

On behalf of Silverbow Limited, First Floor, Block One, Quayside Business Park, Mill Street Dundalk Co Louth, I wish to make a submission in respect of Proposed Variation No. 6 of the Wicklow County Development Plan (WCDP) 2022-2028.

**Background**

Silverbow Limited are owners of substantial development sites at Castle Street and Putland Road, Bray and are actively engaged in the planning system to develop the sites in the short term.

The Castle Street site was recently subject to a refusal of planning permission for Strategic Housing Development (SHD – Ref. ABP-3134425-22) by An Coimisiún Pleanála for a single reason relating to the expiration of the Bray Municipal District Local Area Plan (Bray MD LAP) 2018-2024. It was determined that no statutory zoning applied to the site and the proposed development was therefore not consistent with the legislative pre-conditions for Strategic Housing Development. The development was noted to be of high quality with a good mix of units and quality open space.

Wicklow County Council will be aware that the statutory zoning of proposed development sites is a fundamental requirement for Strategic Housing Developments and Large-Scale Residential Developments.

It is therefore essential for the development of Bray that there is no ambiguity regarding the status of land use zoning objectives.

### **Submission**

This submission is made to request that Map No. 2 ‘Land Use Zoning’ and key development objectives maps from the Bray MD LAP 2018–2024 be incorporated into the WCDP 2022–2028 as part of Variation 6.

The text below is extracted from the proposed Varied Chapter 3 Core Strategy, as published for consultation: -

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

It is requested that this underlined statement be confirmed by the incorporation of the Bray MD LAP Land Use Zoning and Objectives maps into the WCDP as Varied (Variation 6).

The following text is extracted from the proposed Varied Chapter 6 – Housing: -

*In addition, the following residential zones in larger towns, are deemed to be lands that may be in need of new development in order to ensure there is no shortage of housing, and these zones will be examined in detail in order to determine if there are sites where the Vacant Site Levy should be applied.*

<b>Settlement</b>	<b>Zones<sup>14</sup></b>
<b>Bray and Environs</b>	RE, R-HD, R20, R15, R10, R, MU (where the predominate use provided for is residential)
<b>Wicklow Town and Rathnew</b>	RE, R1, R2, R3, R4
<b>Arklow Town and Environs</b>	RE, R28, R20, R10, R, MU (where the predominate use provided for is residential)
<b>Greystones, Delgany and Kilcoole</b>	RE, R22, R17, R15, R10, R5, R2.5, R (Special), MU (where the predominate use provided for is residential)
<b>Blessington</b>	RE, R1, R2

As the Codes in this Table refer to zoning Codes used in the Bray MD LAP 2018-2024 maps, it would be appropriate that zoning and objectives maps for Bray from that LAP are included in Volume 2 of the WCDP as varied.

### **Request**

It is requested that this submission be taken into account and that Variation 6 be amended to include the incorporation of land use zoning and objectives maps for Bray Municipal District in Volume 2 of the WCDP.

Yours sincerely,

Simon Clear.