

	<h1>Variation No.6</h1>
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Who are you:	Agent
Name:	Kismet Limited
Reference:	VAR6-085249
Submission Made	January 8, 2026 8:55 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:

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants - has been appointed by Kismet Limited, [REDACTED] to make this submission on its behalf to Wicklow County Council for consideration as part of advertised (see Appendix 1) proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 and the advertised 'Call for Sites' (see also Appendix 1). This submission pertains to lands owned by our client at Greenane Road, Centre Road, and Ballinderry Road, Ballygannon, Rathdrum, Co. Wicklow in the context of Variation No. 6. Please find a written submission attached. Best wishes, Brendan Buck MIPI.

Upload a File (optional)

BPS Submission to Wicklow County Council - for Kismet Ltd - 8.1.2026.pdf, 5.21MB



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SUBMITTED VIA THE WCC CONSULTATION PORTAL¹

Variation No. 6 & 'Call for Sites' Consultations,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96.

8 January 2026

Dear Sir/Madam,

Submissions to Proposed Variation No. 6 of the Wicklow County Development Plan 2022 – 2028 & the advertised 'Call for Sites'. Submissions request the re-zoning to 'Residential' of lands currently zoned 'AOS - Active Open Space' at Greenane Road, Centre Road, and Ballinderry Road, Ballygannon, Rathdrum, Co. Wicklow in the context of Variation No. 6.

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants – has been appointed by Kismet Limited, [REDACTED] [hereafter "client"] to make this submission on its behalf to Wicklow County Council [hereafter "WCC"] for consideration as part of advertised (see Appendix 1) proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 and the advertised 'Call for Sites' (see also Appendix 1).

This submission pertains to lands owned² by our client at Greenane Road, Centre Road, and Ballinderry Road, Ballygannon, Rathdrum, Co. Wicklow in the context of Variation No. 6.

WCC has issued two consultations to which our client wishes to respond. A single report is attached which responds to both.

The relevant map and form have been completed online as required.

These submissions are lodged prior to the issued deadlines of:

- 5pm on 16 January 2026; and
- 5pm on 2 of February 2026.

We trust this is in order. [REDACTED]

If you require any further details, please contact BPS using the details supplied on this letterhead.

With best wishes,

Brendan Buck

**Brendan Buck MIPI
Managing Director
BPS Planning & Development Consultants LTD**

Encl: Submissions report.

¹ <https://consult.wicklow.ie/en/user/password?current-homepage>

² We confirm that our owns the lands described below and which are the subject of this submission. Documentary proof of this can be provided on request.



Planning & Development
Consultants

Submissions to Proposed Variation No. 6 of the Wicklow County Development Plan 2022 – 2028 & the advertised 'Call for Sites'. Submissions request the re-zoning to 'Residential' of lands currently zoned 'AOS - Active Open Space' at Greenane Road, Centre Road, and Ballinderry Road, Ballygannon, Rathdrum, Co. Wicklow in the context of Variation No. 6.

Submission produced for and on behalf of
Kismet Limited, [REDACTED]
[REDACTED]

Document Control Sheet

Project	Submissions to Wicklow County Council in respect of Variation No. 6 of the County Development Plan and the advertised 'Call for Sites'.
Project No.	2026-101.
Document title	Development Plan Submission

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Date: 8 January 2026

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- 6.1.1 Are likely to contribute to the delivery of housing in the period up to 2040
- 6.1.2 The lands are located in areas where a level of housing demand exists
- 6.1.3 Would support the development of infill housing, housing on brownfield land
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Appendix 1: Consultation advertisements issued by Wicklow County Council

1.0 Introduction

BPS Planning & Development Consultants LTD – a firm of Irish Planning Institute accredited town planning consultants – has been appointed by Kismet Limited, [REDACTED] (hereafter "client") to make this submission on its behalf to Wicklow County Council (hereafter "WCC") for consideration as part of advertised (see Appendix 1) proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 and the advertised 'Call for Sites' (see also Appendix 1).

This submission pertains to lands owned¹ by our client at Greenane Road, Centre Road, and Ballinderry Road, Ballygannon, Rathdrum, Co. Wicklow in the context of Variation No. 6.

WCC has issued two consultations to which our client wishes to respond:

- **Variation No. 6**

A consultation in respect of proposed Variation No. 6 which has been the subject of a Notice issued pursuant to Section 13 of the Planning and Development Act 2000 (as amended).

We understand WCC intends 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. This is 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).

You have invited submissions on the proposed revised Wicklow Core Strategy and associated housing targets, and the proposed revised housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement.

The deadline for written submissions is **5pm on 16 January 2026**. This submission is made via the online consultation portal at www.wicklow.ie. The submission is clearly marked with 'Proposed Variation No. 6'. This submission includes our client's name and a contact address and those of BPS as 'agent' and a map and other details as set out in this report.

We acknowledge that this proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow and does not relate to the potential zoning of new lands for residential development. However, our client considers it necessary to comment on the Variation to set the context for their submission pertaining to your 'Call for Sites'. We are therefore submitting this report to WCC in respect of both consultations.

- **'Call for Sites'**

As noted above, WCC has issued two consultations, the second is a 'Call for Sites' for "Land Suitable for Residential Development". This is a Non-Statutory Consultation which responds to the new Ministerial Guidelines on NPF Implementation: Housing Growth Requirements which were published on the 29 July 2025 on www.gov.ie with the aim of updating development plans to reflect the requirements of the Revised National Planning Framework (NPF) and achieving a significant acceleration in housing delivery. The Guidelines provide for an increased annual housing growth requirement for Wicklow County Council, and an 'additional provision' mechanism to support the zoning of additional lands in areas where it can be justified.

This submission identifies lands owned by our client which they ask to be considered for zoning for new housing development. These lands could meet the objectives of the Guidelines in terms of contributing to the acceleration of housing delivery over the next 15 years.

The consultation is now also open with a deadline of **5pm on 2 of February 2026**. This submission is made via the online consultation portal.

This submission includes a completed 'Call for Sites Questionnaire' form. We have completed Part 1 and Part 2 of the 'Call for Sites' submission process.

We trust that this joint submission made to both consultations adequately represents our client's position as regards the matters raised by WCC. They ask that the Core Strategy and associated housing targets be revised to increase lands zoned for housing at Greenane Road, Centre Road, and Ballinderry Road, Ballygannon, Rathdrum, Co. Wicklow and that the subject lands be considered for re-zoning as residential

¹ We confirm that our owns the lands described below and which are the subject of this submission. Documentary proof of this can be provided on request.

2.0 Purpose of these submissions

2.1 Purpose of this submission as regards Variation No. 6

Our client considers that there is a need to increase the quantum of residentially zoned lands at Ballygannon, Rathdrum, Co. Wicklow in the context of Variation No. 6. WCC is asked to consider:

- Revising the Wicklow Core Strategy and associated housing targets, and housing objectives set out in the Wicklow County Development Plan 2022-2028 Written Statement 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).

As Section 3.1 of Chapter 3 'Proposed Variation' confirms, WCC's existing housing supply targets are far below 'NPF Implementation: Housing Growth Requirements':

- ❖ 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.

These targets must be reflected in the CDP and it is a policy and objective of the new Guidelines that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 [of the guidelines] 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.

Section 3.34 'Population & Housing Allocations' of Chapter 3 'Proposed Variation' 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".

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**.

Fig. 1: Housing Targets for County Wicklow 2025-2040 (Source: Table 3.1 of Chapter 3 'Proposed Variation')

- Amending the Rathdrum Town Plan 2022 – 2028 to provide for sufficient housing supply within Wicklow Town and Rathnew as required by the new guidelines. This aligns with each of the amended National Policy Objectives set out in Fig. 2. Rathdrum is a designated Level 4 Self Sustaining Town settlement (see Fig. 3). Level 4 Self Sustaining Town Plans form part of the County Development Plan 2022-2028 (Volume 2). The Town Plan was adopted on 12 September 2022 and came into effect 23 October 2022. The Town Plan forms part of Volume 2 of the CDP.

NPO11	Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.
NPO17	In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework ⁶ , may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to: <ul style="list-style-type: none"> ▪ Agreement (regional assembly, metropolitan area and/or local authority as appropriate); ▪ Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and ▪ A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.
NPO42	To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.
NPO43	Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
NPO92	Ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.
NPO97	The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.
NPO101	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.
NPO103	When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

Fig. 2: Revised NPOs of the Revised NPF

Table 3.23 Wicklow Settlement Hierarchy

Level	Settlement Typology	Description	Settlement
4	Core Region Self-Sustaining Towns	Self-Sustaining Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.	Baltinglass Enniskerry Kilcoole Newtownmountkennedy Rathdrum

Fig. 3: Excerpt from Table 3.2 Wicklow Settlement Hierarchy of the CDP

- Revising the Rathdrum Town Plan 2022 – 2028 so as to allow well serviced lands – previously zoned residential - to be included in the Core Strategy's housing targets. This is in line with Table 3.3 'Targeted Settlement Growth 2022-2031' of Chapter 3 'Proposed Variation'.

Having regard these new housing growth objectives, WCC has undertaken a review of existing zoned lands in the towns in Levels 1-6 of the Settlement Hierarchy (the location of 'zoned lands') to cater for the Housing Growth Requirements figures has been undertaken in Q3 2025 and is shown in Figs. 3 and 4.

WCC states:

Taking into account: the number of units under construction as of Q3 2025 (c. 2,800); the number of units for which permission has been granted but as yet to commence (c. 2,800 units) and the capacity of the land occupied by these permissions in the event that these developments do not proceed; the capacity of zoned and serviced / serviceable (by 2031) lands without permission (c. 16,000 - 20,000 units); 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) (emphasis added).

As regards Rathdrum, Chapter 3 of 'Proposed Variation 6' includes Table 3.3 which sets out Targeted Settlement Growth 2022-2031. The 2022 Housing Stock was 866 units and the proposed Housing Growth up to 2031 is 390 units (see Fig 4). WCC states:

Rathdrum is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. However, the growth rate possible will be affected by the capacity of the wastewater treatment plant in the short to medium term (emphasis added).

Table 3.4 'Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)' sets out how in Q3 of 2025, Rathdrum had 141 units under construction, but no permitted units yet to be commenced or on appeal or judicial review. The town as only 12 hectares of zoned land with no live permission on those lands. The maximum capacity of existing zoned land with no permission on it is 244 units. These 244 units are all sited on 'Phase 1/Priority 1' lands. There are no other lands, e.g. 'Phase 2/Priority 2'. Of the lands on which 244 units are possible, only 86 units can be delivered as much of those lands are not currently fully serviced (see Fig. 5).

Our client's lands are fully serviceable and have previously been zoned residential.

To support the immediate term delivery of housing on said zoned lands, WCC sets out how 3 no. objectives will apply. These objectives pertain to housing delivery on existing zoned lands or lands with planning permission.

Wicklow County Development Plan 2022 – 2028

Table 3.3: Targeted Settlement Growth 2022-2031

Level	Town	Housing Stock 2022	Housing Growth 2022-2031	RATIONALE
4	Baltinglass	1,016	182	Baltinglass is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Blessington is well located to absorb housing demands arising from the west side of the County. However, the growth rate possible will be affected by the capacity of the wastewater treatment plant in the short to medium term.
	Enniskerry	729	437	Enniskerry is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Enniskerry is well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County.
	Kilcoole	1,543	926	Kilcoole is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Kilcoole is well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County and is due to be served in the short to medium term by enhanced rail services (electrification of line to Wicklow Town).
	Newtownmountkennedy	1,486	892	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.
	Rathdrum	866	390	Rathdrum is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. However, the growth rate possible will be affected by the capacity of the wastewater treatment plant in the short to medium term.

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Fig. 4: Table 3.3 'Targeted Settlement Growth 2022-2031' of Chapter 3 'Proposed Variation'.

Table 3.4 Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)

Level	Town	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Zoned land with no live permission ⁷ (ha)	Estimated capacity of zoned land with no live permission (units)	Of which, subject to 'Phase 1/Priority 1' designation or no phasing designation	Of which, subject to 'Phase 2/Priority 2' designation ⁸	Estimated capacity of zoned and currently fully serviced ⁹ land with no live permission (units)	Estimated capacity of zoned and serviceable ¹⁰ land with no live permission (units)
4	Baltinglass	69	69	0	5	96	96	0	48	48
	Enniskerry	113	17	129	13	455	455	0	455	455
	Kilcoole	173	57	0	32	1,094	796	298	1,094	1,094
	Newtownmountkennedy	447	43	0	3	77	77	0	77	77
	Rathdrum	141	0	0	12	244	244	0	86	86

Fig. 5: Table 3.4 'Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)'

- Achieving compliance with the National Planning Framework's First Revision (April 2025) by setting out new housing growth requirements (see pages 7 and 8 of Chapter 1 'Proposed Variation'²). Our client respectfully submits that additional lands need to be zoned to achieve the required future housing capacity in Rathdrum. Table 3.5 'WICKLOW CORE STRATEGY Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-613)' sets out how the housing supply target for Rathdrum up to 2031 is 190 units of which 141 are under construction. Lands need to be zoned for a further 49 units. 1.4 hectares of additional land needs to be zoned residential as there is only 2.5 hectares of zoned and services land currently available up to 2031.

Table 3.5 WICKLOW CORE STRATEGY Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-613)

Level	Town	New housing target 2025-2031 ¹⁴ (units)	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Further growth required up to 2031 (units)	Amount of zoned land required to accommodate further growth up to 2031 (ha)	Amount of zoned and serviced land available up to 2031 (ha)
4	Baltinglass	170	69	69	0	32	0.9	1.4
	Enniskerry	418	113	17	129	159	4.5	13
	Kilcoole	878	173	57	0	648	18.5	31
	Newtownmountkennedy	545	447	43	0	55	1.6	3
	Rathdrum	190	141	0	0	49	1.4	2.5

Fig. 5: Table 3.5 'WICKLOW CORE STRATEGY Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-613)'

- The subject lands can contribute to the existing increasingly sustainable pattern of residential development in this part of Ballygannon and Rathdrum. National Policy Objectives 68 of the NPF states:

*A Metropolitan Area Strategic Plan may enable up to 20% of the phased population growth targeted in the principal city and suburban area, **to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This will be subject to:***

- ✓ **any relocated growth being in the form of compact development, such as infill or a sustainable urban extension;**
- ✓ **any relocated growth being served by high capacity public transport and/or related to significant employment provision; and**
- ✓ **National Policy Objective 9, as set out in Chapter 4** [emphasis added].

A compact residential development can be achieved on the lands, and it would be viewed as infill development. Rathdrum is served by rail and bus services. The re-zoning of the lands would accord with NPO 9.

Our client submits that the proposed amendments set out in Variation No. 6 point to a need to look beyond existing zoned lands and existing permissions to consider new lands for residential development. Section 2.2. of this report points to how these lands at Ballygannon, which are set within the context of a number of existing housing estates, could be seamlessly added to the supply of residentially zoned lands in County Wicklow and Rathdrum.

2.2 Purpose of this submission as regards the issued 'Call for Sites'

Our client appreciates WCC's 'Call for Sites'. They own lands in the Ballygannon residential area in Rathdrum, with an area of approx. 2.47 hectares. The lands are located within the boundary of the Rathdrum Town Plan 2022-2028 at a location where there is adjoining residential development located to the east and residential development sited across adjoining roads to the north, south, and west.

These lands, which are currently zoned 'AOS – Active Open Space' (See Fig. 6) were previously zoned 'R20 – Residential' under the Rathdrum Local Area Plan 2017 (see Fig. 7). That is, until 2022, WCC considered these lands to be wholly suitable for residential development. This being the case, a development on these lands could be seamlessly added to the supply of residentially zoned lands in County Wicklow and available to the Rathdrum and Ballygannon areas.

Our client is seeking to achieve a sustainable use of these lands that is compatible with the expanding and rapidly developing town of Rathdrum.

There has been no movement to develop the subject lands as AOS. The lands remain undeveloped and vacant. They are under-utilised at a location which comprises one of Rathdrum's oldest housing areas.

There is a need to decide on a possible future use for these lands over the coming years. The lands would be suitable for the development of a residential estate.

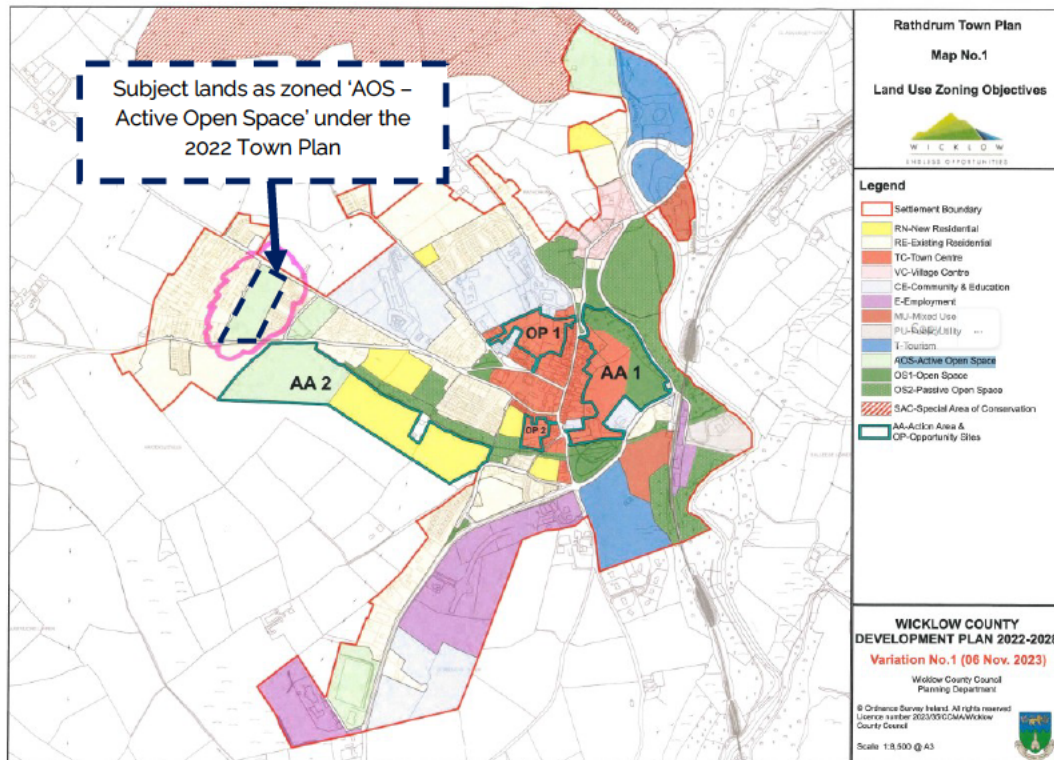


Fig. 6: The location of the lands as zoned under the Rathdrum Town Plan 2025

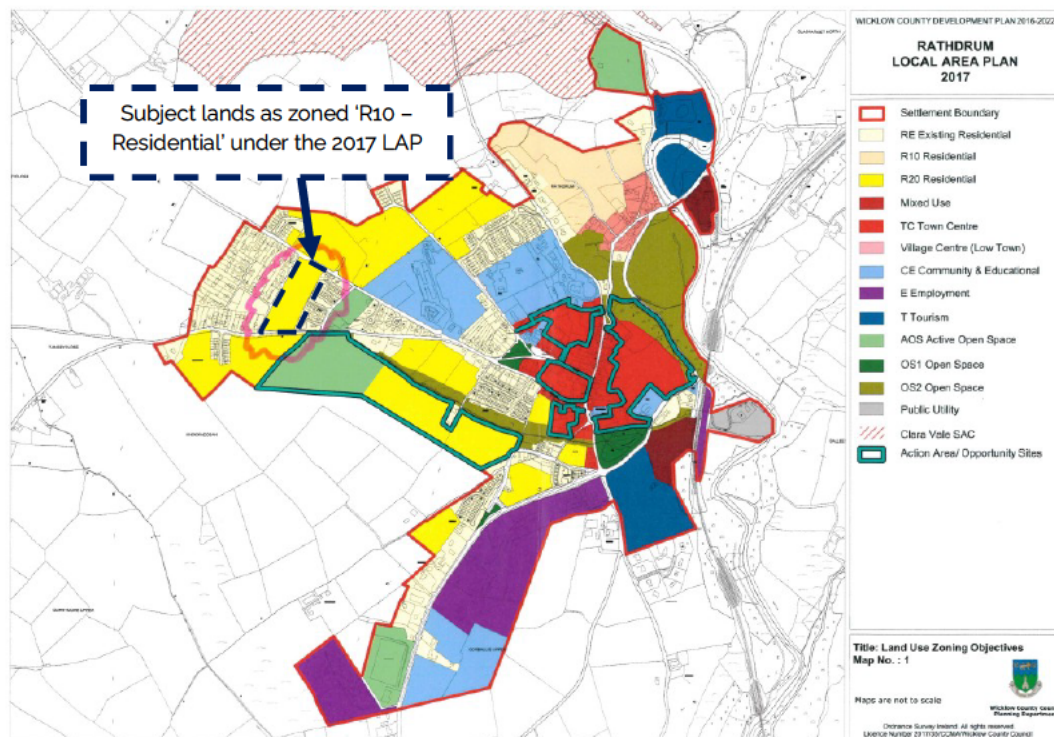


Fig. 7: The location of the lands as zoned under the Rathdrum Local Area Plan 2017

3.0 Location & description of the subject lands

The subject lands, with an area of 2.47 hectares are located in the Ballygannon residential area of Rathdrum. The lands are presently undeveloped, and they maintain the appearance of a field.

The lands adjoin the Kingsbrook residential scheme to the east and there are multiple housing developments located across each of the adjoining roads on the other sides of the site. This is a residential suburb of

Rathdrum beyond which there are open fields. The adjoining and surrounding housing developments are each zoned 'RE – Existing Residential'.

There is considerable zoned and unzoned land in the area of the site which is undeveloped and maintains the appearance of open space.

The lands maintain a considerable slope which reduces their potential useability as Active Open Space. Housing developments in the vicinity have addressed the sloping area with responsive architectural designs.

The lands are located 1.9km from Rathdrum Train Station, approx. 1.7km from the closest bus stop, and 1.1km from the Main Street. There are footpaths on both Ballinderry Road and Greenane Road which extend from the town to the lands.

Map No. 3 of the Rathdrum Town Plan confirms the lands are not sited within an Indicative Flood Zone.

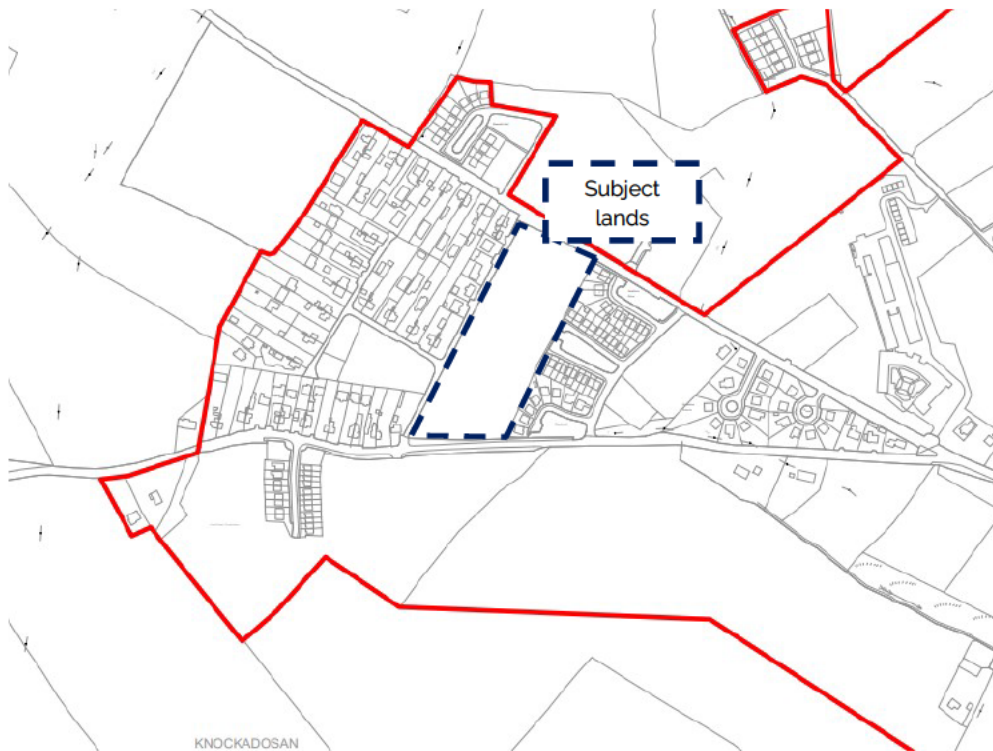


Fig. 8: The subject lands set within a residential context



Fig. 9: The subject lands set within a residential context



Fig. 10: The subject lands adjoining Centre Road



Fig. 11: The subject lands adjoining Greenane Road

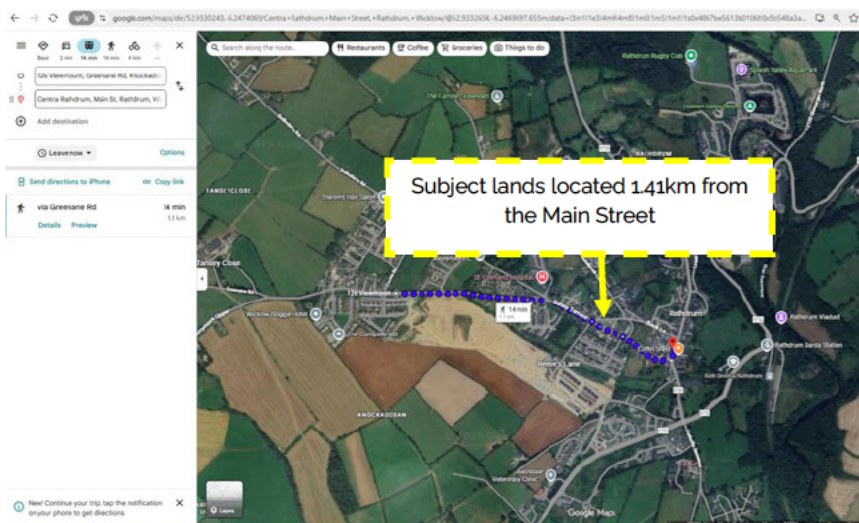


Fig. 12: Distance of client lands from the centre of Rathdrum – as per Google Maps

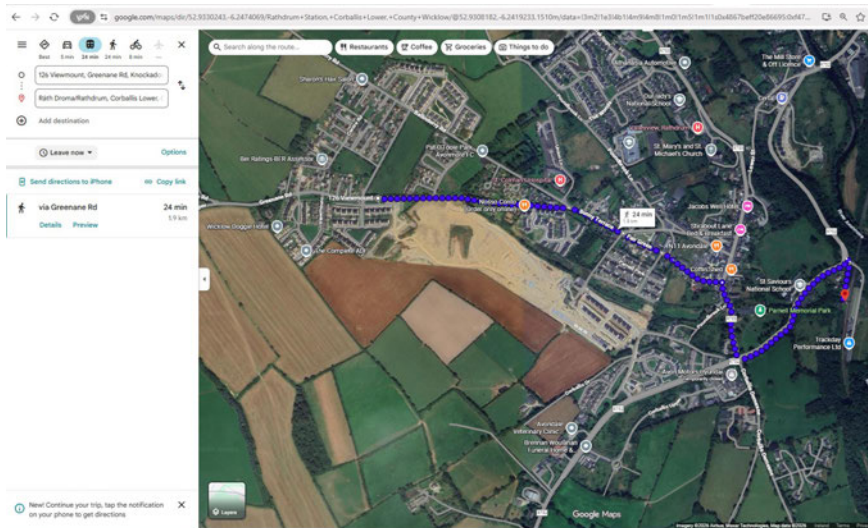


Fig. 13: Distance of client lands from Rathdrum Train Station – as per Google Maps



Fig. 14: Open undeveloped lands located around Ballygannon and the Town Plan's boundary



Fig. 15: Existing footpaths and public lighting as the Greenane Road passes the site (to the right side)



Fig. 16: Existing footpaths and public lighting as the Ballinderry Road passes the site (to the right side)

4.0 Relevant existing planning characteristics of the lands

The following points characterise these lands:

- The lands are sited within the boundary of the Rathdrum Town Plan.
- Map No. 2 of the Rathdrum Town Plan confirms that these lands@ are not in a Special Area of Conservation or Special Protection Area for Bird; they do not contain any protected structures or National Monuments; they are not in an Architectural Conservation Area; they are not in the viewshed of any property views or prospects; they are not sited in or close to a Natural Heritage Area or Proposed Natural Heritage Area; and the site does not contain any Tree Preservation Orders.
- Map No. 3 of the Rathdrum Town Plan confirms the lands are not sited within an Indicative Flood Zone.

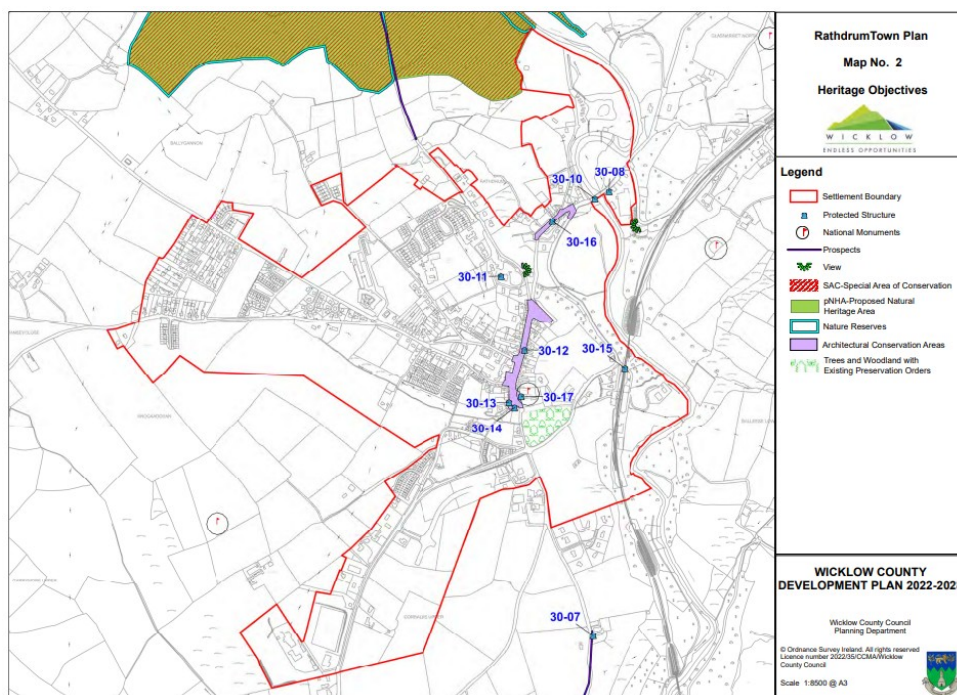


Fig. 17: Map No. 2 of the Rathdrum Town Plan

5.0 Land use zoning history

5.1 Land use zoning history of these lands

As noted above, these lands were zoned residential until the current Town Plan was adopted. The lands have otherwise been used for agricultural purposes in perpetuity.

The decision made by WCC to downzone these lands in the current Town Plan represented the most significant zoning change in this part of Rathdrum at that time. The decision removed 2.47ha. of serviced land from the plan.

Our client, a well-known developer, who is connected to a well-known developer, would have developed these lands had they not been downzoned.

5.2 Land use zoning history of nearby lands

Under the current Town Plan and the previous Local Area Plan, lands to the south and across the Greenane Road are being developed under the following planning permissions:

- *Reg. ref. 21311:* Construction of a residential development comprising of 92 no. dwellings in total: consisting of 4 no. 3 bed bungalows, 3 no. 2 bed terrace dwellings, 3 no. 3 bed terrace dwellings, 36 no. 3 bed semi-detached dwellings, 40 no. 4 bed semi-detached dwellings, 2 no. 4 bed detached dwellings, 2 no. 1 bed duplex units and 2 no. 2 bed duplex units. The development will also consist of 2 no. new site entrances to the west and east of the site, pedestrian links to adjoining estates and the development of active open space to the west of the site. All of the above together with associated site development works on site.

This development permitted both open space and residential development on lands zoned residential and Active Open Space.

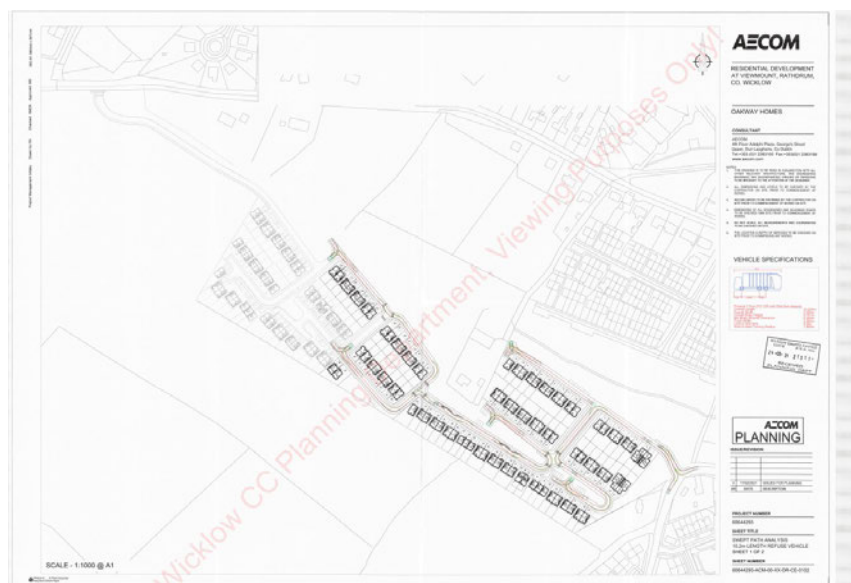


Fig. 18: Residential development permitted under reg. ref. 21311

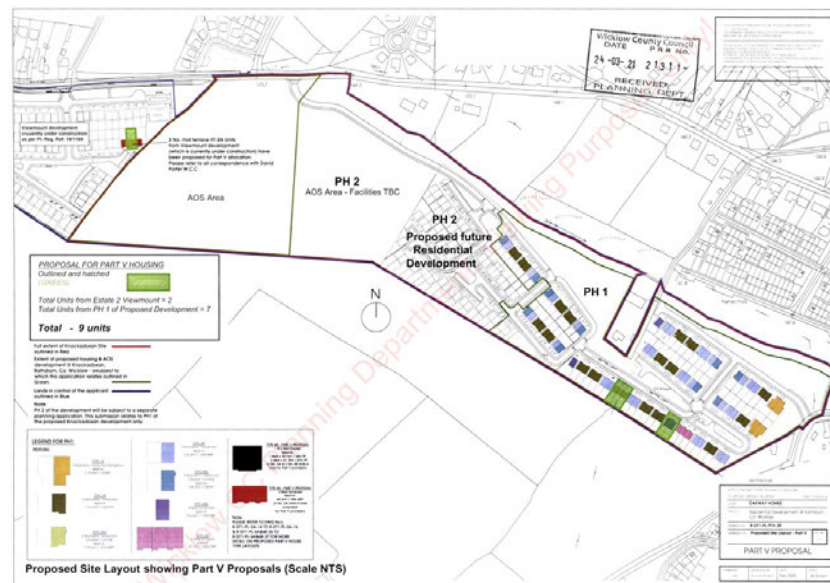


Fig. 19: Residential development and Active Open Space development permitted under reg. ref. 21311

- *Reg. ref. 22258:* 1) Construction of a residential development comprising of 46 no. dwellings in total 2) The development of Active Open Space to the West of the site. 3) Public Open Space, services, pedestrian

links and site access for the proposed development all as per previously approved PL Reg Ref 21/311. All of the above together with associated site development works on site.

Again, this development permitted both open space and residential development on lands zoned residential and Active Open Space.



Fig. 20: Residential development and Active Open Space development permitted under reg. ref. 22258

We respectfully submit that the manner by which these nearby lands have been developed could be replicated in the subject lands. An Area can be retained as AOS while a portion of housing be developed to deliver housing. This will ensure both housing and useable AOS are achieved by WCC on the subject lands.

6.0 Grounds for the subject lands adding to WCC's supply of housing lands

Our client maintains that there are several grounds for considering these lands suitable for inclusion in WCC's amended housing supply calculations as set out in the, to be amended, Wicklow Core Strategy's Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-613).

We note how the starting point for this submission is recommending that more lands be zoned for residential development at Ballygannon in Rathdrum. In particular, our client's lands, previously zoned residential but presently zoned AOS could be fully or partly re-zoned in order to deliver housing and public/communal open space.

The future re-zoning of these lands to contribute to Wicklow's housing supply targets would be welcomed as a sustainable land use for these lands into the future. These lands are, due to their siting close to existing housing estates, services, and open spaces, wholly suited to residential development.

The lands have previously been zoned 'residential' under the 2017 Rathdrum Local Area Plan on the basis that they would be developed in a compatible manner with similarly zoned lands to the south. Those lands retained their zonings under the current Town Plan and are underdevelopment as residential and AOS areas (see planning permissions reg. refs. 21311 and 22258).

The subject lands are accessible by and serviced by multiple roads, footpaths, public lighting, and all necessary water, drainage, electricity services, etc.

The subject lands are not sensitive and are not characterised by any planning designation which would prevent their being developed for residential.

Our client submits that these lands could be re-zoned to permit residential development without causing any undue environmental, landscape or heritage impacts, and the benefit of the re-zoning is that these lands

could connect to and contribute to the development of the existing, zoned, lands to the north, south, east, and west.

6.1 Addressing the criteria issued by WCC under its 'Call for Sites' advertisement

6.1.1 Are likely to contribute to the delivery of housing in the period up to 2040

If re-zoned, these lands would contribute to the delivery of housing in the period up to 2040. There has been considerable development on lands to the south of the site in the past years (see above). The development of the subject lands would contribute to a growing community in Ballygannon which, with increased numbers, will eventually achieve better services.

We submit that our client's lands would allow a natural residential extension or infill development in this area accompanied by public and communal open space.

6.1.2 The lands are located in areas where a level of housing demand exists

These lands are located in areas where a level of housing demand exists. Pressure for housing in Rathdrum and is acute. The housing development which forms part of planning permission reg. refs. 21311 and 22258 is not sufficient to meet growing demand for housing in the town.

In making this submission, our client has regard to the County Development Plan and to development and emerging housing supply growth objectives, including the amount of zoned housing land and phasing / prioritising objectives anticipated for County Wicklow, Wicklow Town, and Rathdrum (see Section xx of this report).

This submission has considered also the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning PART A – iii Authorities' (DoHLGH 2022) and the 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025).

We submit that the proposed residential zoning included in this submission are on the basis of providing enough housing land to address the new housing supply requirements set out in Variation No. 6.

the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP, with flexibility in the zoning provisions to ensure that: (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise, and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

This submission adheres to the compact growth, sequential development and phasing principles set out in the existing CDP and LAP while having regard to Variation No. 6.

6.1.3 Would support the development of infill housing, housing on brownfield land

The zoning of these lands would support the development of infill housing as the context for these lands is characterised by existing housing estates and the emerging development permitted under planning permissions reg. refs. 21311 and 22258.

6.1.4 These lands can be serviced

There would not appear to be any infrastructural constrain which would prevent the zoning of these lands for development. A residential development can be served by road, mains water, surface water, foul water and electricity infrastructure. This is confirmed by the AOS and residential development to the south granted planning permission under reg. refs. 21311 and 22258.

6.1.4.1 Road access is available

The road network in this area has already been determined by existing developments and planning permissions.

These lands can be accessed by no less than 3 no. public roads. It is a wholly accessible site which could offer excellent permeability through its extent.

6.1.4.2 Pedestrian access is available via existing pedestrian paths

It is submitted that the subject lands can be accessed in a manner which would be in keeping with the proper planning and sustainable development of this area of Rathdrum as the site is served by footpaths to the north and south. A future development of these lands as residential could offer additional footpaths and public lighting making the areas more pedestrian friendly.

6.1.4.3 Public transport is available at Rathdrum

The site is located where there are good public transport services including bus services and access to mainline rail in Rathdrum. The distances are walkable.

6.1.4.4 The lands are located in an area with good social infrastructure

The lands located in Rathdrum which has good social infrastructure with capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure. The WCC decisions under recent permissions reg. refs. 21311 and 22258 confirmed this to be the case.

6.1.5 Zoning these lands would provide certainty as regards sequential development

Zoning gives a degree of certainty to residents, developers, etc. Variation No. 6 and the 'Call for Sites' consultation process needs to provide landowners and developers in the town with a clear idea of the future shape of Rathdrum and an understanding of exactly how new housing supply targets will be met. Our client suggests that the Town Plan be amended to add their lands.

The zoning of these lands would contribute to sustainable, compact and sequential patterns of growth.

The lands are more than 0.4 hectares (1 acre) in size and have capacity for 10 or more homes –

6.1.6 No impacts would arise from the future development of these lands

The zoning of these lands would not appear to raise any impacts on any sensitive designations or on any adjoining properties.

These lands could be zoned without raising any objection. This would appear to provide a balance between the need for additional housing land and the need to prevent impacts.

6.1.7 No significant legal, topographical or environmental / heritage impediments to development

The subject lands are suburban in their siting and appearance. They are surrounded by residential areas. These lands are not within, or within the vicinity of, any of the following amenity, landscape, environmental or other designations:

1. Natural Heritage Area,
2. Special Area of Conservation,
3. Special Protection Area,
4. Protected Structure,
5. Architectural Conservation Area,
6. Preserved views or prospects,
7. Tree Preservation Orders, etc.

The lands are suitable for residential use as now sought as they would connect into the emerging development to the east and can offer quality public and communal open spaces. The subject lands can also offer landscaped boundaries in place of existing hedgerows which currently make the area appear somewhat unplanned.

6.1.7.1 No impacts on adjoining properties

The zoning of these lands for housing would not impact on any adjoining properties and certainly no residential properties.

6.1.7.2 No visual impact concerns arise

The zoning of the subject lands for residential development would not have any discernible impact on the landscape, but would facilitate modern settlement and development needs.

7.0 Conclusion & recommendation

Arising from the above analysis, it is the professional opinion of BPS, as an accredited firm of town planning consultants, that:

- Variation No. 6 places WCC in a position where it needs to consider how to achieve significant increases in the supply of residentially zoned land. There is a need to proactively consider all possible lands.
- The 'Call for Sites' issued by WCC is made in the context of Variation No. 6. Our client offers their lands at Ballygannon, with an area of 2.47ha., as suitable for re-zoning for residential development. These lands almost adjoin a large recent large development permitted under reg. refs. 21311 and 22258.
- Critically, the lands:
 - ❖ Are likely to contribute to the delivery of housing in the period up to 2040.
 - ❖ Are located in areas where a level of housing demand exists.
 - ❖ Would support the development of infill housing, housing on brownfield land or address vacancy and dereliction.
 - ❖ Are serviced or have the potential to be serviced (i.e. have the ability connect to roads infrastructure and water, wastewater, surface water and electricity networks).
 - ❖ Are located in areas with good public transport services.
 - ❖ Are located in or adjoining towns or villages with good social infrastructure with capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure.
 - ❖ Can Contribute to sustainable, compact and sequential patterns of growth.
 - ❖ Are greater than 0.4 hectares (1 acre) or more in size and have the capacity for 10 or more homes.
 - ❖ Are not subject to any significant legal, topographical or environmental / heritage impediments to development coming forward.


The re-zoning of these lands would support WCC's new housing supply targets and help it to achieve the new objectives set out in the Revised NPF. The 'NPF Implementation: Housing Growth Requirements' - Guidelines for Planning Authorities, issued under Section 28 of the Planning & Development Act 2000 (as amended) (July 2025) clearly require significant re-working of the County Development Plan and the Local Area Plan as regards zoned housing land. This submission offers a previously zoned site as one which could be zoned to address the current national policy of increasing housing supply.

Signed:


Brendan Buck

BPS Planning Consultants LTD
Members of the Irish Planning Institute
8 January 2026


Appendix 1: Consultation advertisements issued by Wicklow County Council



WICKLOW COUNTY COUNCIL
COMHAILLE CHONTAE CHILL MHAINTAIN



WICKLOW
EMPOWER OPPORTUNITIES





Comhairle Contae Chill Mhantáin Wicklow County Council

WICKLOW COUNTY COUNCIL

COMHAIRLE CHONTAE CHILL MHANTÁIN

CALL FOR SITES: LAND SUITABLE FOR RESIDENTIAL DEVELOPMENT

NON-STATUTORY CONSULTATION NOW OPEN

New Ministerial Guidelines on *NPF Implementation: Housing Growth Requirements* were published on the 29 July 2025 on www.gov.ie with the aim of updating development plans to reflect the requirements of the Revised National Planning Framework (NPF) and achieving a significant acceleration in housing delivery. The Guidelines provide for an increased annual housing growth requirement for County Wicklow, and an 'additional provision' mechanism to support the zoning of additional lands in areas where it can be justified.

In response to these new Guidelines, Wicklow County Council is undertaking a non-statutory '**Call for Sites**' consultation inviting 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.

Wicklow County Council is particularly seeking to identify lands/sites across the County that fulfil the following criteria:

- Are likely to contribute to the delivery of housing in the period up to 2040
- Are located in areas where a level of housing demand exists
- Would support the development of infill housing, housing on brownfield land or address vacancy and dereliction
- Are serviced or have the potential to be serviced (i.e. have the ability connect to roads infrastructure and water, wastewater, surface water and electricity networks)
- Are located in areas with good public transport services
- Are located in or adjoining towns or villages with good social infrastructure with capacity in schools and community facilities, or that can provide for the development of necessary social infrastructure
- Contribute to sustainable, compact and sequential patterns of growth
- In the case of 'greenfield' lands are 0.4 hectares (1 acre) or more in size, or have capacity for 10 or more homes
- Have no significant legal, topographical or environmental / heritage impediments to development coming forward

This call for sites is a non-statutory consultation to identify sites for further assessment. Landowners should be aware that any lands zoned for residential use may be liable for the annual **Residential Zoned Land Tax**.

Details of the consultation can be found on the Council's website www.wicklow.ie and through the **online consultation portal**. Please scan the QR code on this notice to access the portal.

The portal can also be accessed at the Planning Counter computers at Wicklow County Council offices, Station Road, Wicklow Town, A67 FW96 during normal office hours.

Alternatively you can request a pdf or printed information pack be emailed / posted to you by calling 0404 20148 or emailing callforsites@wicklowcoco.ie.

If you have any questions regarding the website or portal, or would like to request an information pack, please contact Wicklow County Council Planning Department on 0404 20148 or email callforsites@wicklowcoco.ie. **In light of Wicklow County Council opening hours over Christmas 2025, please be advised that any such inquiries / requests will be attended to from 02 January 2026 onwards.**

MAKING A SUBMISSION

The consultation **is now open** and will run **until 27 February 2026**. Submissions made before 5pm (17:00) on Friday 27 February 2026 will be taken into consideration.

Submissions can be made in one of the following ways:

1. Through the online consultation portal – which can be accessed via at www.wicklow.ie, or by scanning scan the QR code on this notice; **or**
2. Submit a hard copy completed 'Call for Sites' form to the Administrative Officer, Planning Section, Wicklow County Council, County Buildings, Station Road, Wicklow Town, A67 FW96.
Copies of the 'Call for Sites' form can be obtained from Wicklow County Council offices or downloaded via the website. Forms can also be posted to you if needed – please contact the Planning Department on 0404 20148 or emailing callforsites@wicklowcoco.ie.

In light of Wicklow County Council opening hours over Christmas 2025, please be advised that any such requests will be attended to **from 02 January 2026 onwards**.

PLEASE NOTE

- All submissions must be made in the format required - through the portal **OR** if submitting a hard copy by using the 'Call for Sites' form. No other format will be received – please do not email forms, or submit any other documentation.
- Each individual site should be subject to its own submission.
- The planning process is an open and public one, therefore all submissions/observations are a matter of public record and will be available for public viewing; they may also be placed on the County Council's website and therefore should not include any personal information.
- This is a 'Call for Sites' for suggestions of lands that could be considered for future zoning for housing development. The land owner is responsible for activating the site for delivery of housing. This is not a call for sites for Wicklow County Council to purchase.
- **YOU ARE STRONGLY ADVISED TO MAKE YOUR SUBMISSION AS EARLY AS POSSIBLE LATE SUBMISSIONS WILL NOT BE ACCEPTED**



Wicklow County Council is committed to Access for All. Please contact Wicklow County Council on 0404-20100 should you have a specific access requirements.