

	<h1>Variation No.6</h1>
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Who are you:	Private Individual
Name:	Patrick Casey
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Senator Pat Casey
Spokesperson on Finance

Administrative Office
Planning Section
Wicklow County Council
Station Road
Wicklow Town

1 January 2026

Subject: Observations on Proposed Variation No. 6 Wicklow County Development Plan

A Chara,

I wish to submit the following observations regarding the proposal to vary the Core Strategy and Housing Policy of the adopted Wicklow County Development Plan 2022–2028.

We are at a pivotal moment. The urgency of the housing crisis demands decisive action to increase housing delivery and fully align with the NPF Implementation Housing Growth Requirements issued in July. The adoption of a new Core Strategy will have far-reaching implications for housing delivery across Wicklow and will set a critical precedent for the future development of our county.

In reviewing the Core Strategy, the planning authority must address the new annual housing growth requirement for Wicklow of 2,068 (2025 – 2034) and 935 units (2035 – 2040) with an additional provision of up to 50% above the baseline, resulting in an annual requirement of 3,102 units up to 2034 and 1,403 up to 2040 (Table 1).

The variation to the Core Strategy must acknowledge a key reality: a significant proportion of zoned lands remain inactive during the lifetime of the Development Plan. The published variation of the Core Strategy asserts that no additional land zoning is necessary to meet this 76% increase or the additional units of 8,788 to 2031 (Table 2).

This claim is highly questionable, as it relies on overly optimistic assumptions, particularly regarding housing densities, proposing an increase in Bray from 40dph to 73dph, Greystones/ Wicklow/Rathnew from 30dph to 48dph. These proposed densities are unrealistic, unviable, and undeliverable. If adopted, they will exacerbate the housing crisis rather than resolve it.



Progress is evident in Wicklow under the current Core Strategy and densities, with significant housing delivery across the whole county averaging over 1,300 housing units in the last 3 years and our new target of 2,068 will be challenging. So, let's refrain from making changes to the areas that are clearly performing and delivering strong results.

The only real constraint over this period has been the technical enforcement of the existing Core Strategy. Several planning applications have been refused solely because they exceeded population limits or involved Phase 2 or Residential 2 zoned lands.

Constituency Office:

Fitzwilliam Square, Wicklow Town, Co. Wicklow, A67 X858

Email: pat.casey@oireachtas.ie

Phone: 086 2649483  



 **FIANNA Fáil**
THE REPUBLICAN PARTY

Recommendations that I will expand on in more detail separately:

- Maintain the current density standards as set the current CDP and adopt them into the new Core Strategy.
- Population and Housing Allocation: The Core Strategy should consider the immediate and long-term future, and the Tables should reflect this, (short-term horizon to 2031 and a longer-term horizon to 2040).
- Revise the growth allocation for Greystones, as it is completely at odds with allocations for other settlements facing similar challenges, there is possibilities that some Towns with Level 5 and 6 could be targeted for higher growth and also consider increasing the growth for levels 7-10.
- Ensure that all tables follow a clear, logical, connected and sequential structure.
- Prepare another variation based on the new Core Strategy that will be adopted by the members, include the relevant sites that have been identified in the Call for Sites process and consider extending the current plan for an additional 2-year period.

While I appreciate that the County Development Plan will be replaced in 2028 and its review will commence later this year, we cannot afford to wait for over two years for that process. If an additional variation, based on the adopted new Core Strategy, can be delivered sooner, that is the process we should pursue, up to 2 years could be saved using this process.

Considering the recent decision by An Coimisiún Pleanála to refuse planning on the old Heitons Buckley site in Bray for 139 units, due to the lapsing of the Bray LAP, I fully support the proposal to integrate Bray LAP and others into Volume 2 of the current CDP as this resolves the issue.

It is my personal observation that we ourselves must accept a level of responsibility for. But the process has become a nightmare. The layers of bureaucracy, legislation, and policy are now actively obstructing delivery.

The process of adopting a Variation or even progressing a County Development Plan has become an extremely technical exercise, dominated by dense tables, percentage allocations, growth-rate calculations, and zoning metrics such as those found in Tables 6.2 and 6.3. The language itself is highly specialised, relying on planning terminology like headroom, phasing, and serviceable land, and requiring cross-referencing across multiple policy tiers including the NPF, RSES, LAPs, and LFPs.

What was once a planning-led process is now effectively a compliance driven one. The system has been placed on a legislative footing through the National Planning Framework, which means that national policy is no longer guidance, it is binding. This shift carries significant consequences. We have already seen multiple housing applications refused not because of poor planning outcomes, but because of technical non-compliance with policy formulas, population projections, or zoning quotas.

The result is a planning system that is constrained by its own rulebook. The growth strategy proposed in this Variation would look entirely different if we were not bound by layer upon layer of policy requirements, numerical thresholds, and prescriptive rules. Instead of enabling delivery, the current framework often restricts it, leaving local authorities with limited flexibility to respond to real-world housing need, market conditions, or infrastructure capacity.

Finally, can I thank you for your time in considering this submission and I look forward to seeing some significant amendments in the Chief Executive's report that will support the delivery of homes.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Pat Casey', with a large, sweeping flourish above it.

Pat Casey

Additional Information

Housing Targets 2025 -2040

In each of the cases outlined below, I have included the additional provision to ensure a clear understanding of the amount of land required to deliver the housing targets. This is particularly important given that, for a variety of reasons, a significant proportion of zoned land is typically not activated over the course of a Development Plan.

Table 1. Existing and New Annual Housing Requirements

	Existing Housing Requirements CDP 2022 -2028		New Requirements 2025-2034		New Requirement 2035-2040	
Annual Housing Units	1,411		2,068		935	
Additional Provision	353	25%	1,034	50%	468	50%
Total	1,764		3,102		1,403	

Table 2. Total Growth Requirements 2025 - 2031 and 2025 -2040

Growth Requirements	2025 – 2031 7 years	2032-2034 3 years @ 3,102 Units pa	2035-2040 6 years @ 1,403 Units pa
Current housing requirement including additional Provision of 25%	12,348		
New housing requirement including additional provision of 50%	21,714	9,306	8,418
Cumulative Requirement	21,714	31,020	39,438
Less completions Q1 and Q2 2025	578		
Cumulative Requirement less completions	21,136	30,442	38,860
Additional Requirement over current	8,788		

The above tables include the additional provision of 50% identified in Policy and Objective 2

Settlement Growth

Table 3.3 Targeted Settlement Growth and Distribution

I have revised the table to present the percentage growth attributable to each town. Using the total growth figure of 26,369, I calculated each town's proportion of this overall growth by dividing its individual growth value by the total.

These proportions represent each town's share of total growth and will subsequently inform the distribution of housing units.

I have also included changes to both Greystones and levels Level 5, 6 and 7 - 10 growth figures and added additional text in red. Some towns designated as Level 5 and Level 6 already possess the necessary infrastructure, are successfully delivering new housing, and have the capacity to accommodate further development.

There is a strong case for treating Arklow as an exception, for all the reasons already outlined. It has the infrastructure capacity, a substantial economic base, and a strong jobs ratio. Given these factors, I see no justification for imposing restrictions on it, and I would therefore amend the figure to 100%.

At the same time, we should capitalise on the opportunity for developers to take a leading role in providing infrastructure within our small villages, enabling them to support and deliver additional sustainable growth.

Amend Table 3.3 with Table 3 attached.

National Planning Framework

NPO7: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

NPO9: Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.

The principles behind these policies are sound in terms of what they aim to achieve. However, applying them uniformly across all settlements without a detailed analysis of what is practical and achievable poses significant challenges.

While some work has been undertaken through various LAP and LFP variations to identify suitable sites, delivering on these objectives remains difficult in certain cases. Where implementation is not feasible, a strong case should be made to allow for the identification of alternative lands that can realistically meet development needs.

While I acknowledge that this is a national policy, it is evident from several of our LFPs and LAPs that achieving 30% or 40% of new development within the existing built-up footprint presents significant challenges.

Table 3. Targeted Settlement Growth and Distribution

Level	Town	Housing Stock 2022	Housing Growth based on Rationale	Housing Growth %	Distribution of growth as a % of Total Growth (28,039)	Rationale for Growth
1	Bray	12,968	6,479	50%	23%	Key Towns are identified for substantial growth rates of not less than 50% having regard to their identification in the RSES as towns suitable for higher levels of growth. Bray is well located with respect to the Metropolitan Area to absorb housing demands arising in the Metropolitan Area and is served by DART. As Bray is geographically constrained by the County boundary, the coast and Bray Head / Little Sugarloaf, it is considered that 50% is the highest rate achieved in the short to medium term.
2	Wicklow - Rathnew	6,231	4,050	65%	14%	Key Towns are identified for substantial growth rates of not less than 50% having regard to their identification in the RSES as towns suitable for higher levels of growth. Wicklow Town - Rathnew is determined to have the capacity to achieve and slightly exceed 50% in the short to medium term, particularly taking into account that it is due to be served in the short to medium term by enhanced rail services (electrification of line to Wicklow Town).
	Arklow	5,566	5,566	100%	20%	Arklow is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. In the case of Arklow, growth has been held back for more than 25 years due to inadequate wastewater infrastructure, a deficiency that has now been rectified. In order to capitalise on this investment and catch up on decades of lost growth, Arklow is targeted to grow significantly in the short to medium term.
3	Greystones - Dalgany	8,216	4,108	50%	15%	Greystones - Dalgany is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Greystones - Dalgany is well located with respect to the Metropolitan Area to absorb housing demands arising in the Metropolitan Area and is served by DART, particularly taking into account DART+ Coastal South will seek to deliver the infrastructure enhancements and upgrades that will enable an increase in train frequency from 2 trains per hour to 3 trains per hour between Bray and Greystones.
	Blessington	2,016	912	45%	3%	Blessington 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.
	Ballinglass	2,026	507	25%	2%	Ballinglass is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17. Blessington Ballinglass 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.
4	Enniskerry	729	437	60%	2%	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	60%	3%	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).
	Newtownmountkenedy	1,486	892	60%	3%	Newtownmountkenedy is deemed suitable for a growth rate of not less than 30% subject to the agreements required under NPO 17.
	Rathdunum	866	520	60%	2%	Newtownmountkenedy is well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County. Rathdunum 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.
5	Ashford, Aughrim, Carnew, Durlawn, Tinnahilly	2,708	1,625	60%	6%	The towns in Level 5 are cumulatively considered to have capacity to growth at a rate of not less than 30% subject to the agreements required under NPO 17.
6	Auoca, Donard, Kilmacanogue, Newcastle, Roundwood, Villages / Clusters Open Countryside	1,766	530	30%	2%	The towns in Level 6 are not considered to have capacity to growth at a rate in excess of 30%; a cumulative growth rate of 30% 20% is deemed appropriate.
7 to 10		14,878	1,488	10%	5%	With the advent of developer led wastewater facilities there is an opportunity to grow our Villages
Total Growth			28,039		100%	

Horizon

While the current report looks towards 2031, this is an ideal opportunity to extend our planning horizon to 2040. Taking a longer-term view would enable a truly plan-led approach, one that clearly defines how we want our communities to evolve and ensures that growth is supported by critical infrastructure, sustainable transport, community services, and essential facilities.

Addressing existing deficits now and planning for future needs is vital to creating resilient, well-connected, and liveable communities. This forward-thinking approach will help us manage density effectively, reduce pressure on services and deliver balanced development that meets the needs of both current and future generations.

The Planning and Development Act provides for the extension of the current Development Plan, and serious consideration should be given to assessing this option. Extending the plan by, for example, two years would allow the adopted Core Strategy—and any subsequent variations arising from this process—sufficient time to take effect and be properly evaluated. It would also provide additional time to prepare for the first ten-year County Development Plan, ensuring a more robust and informed approach to long-term planning.

Density

Proposal to maintain the existing County Development Plan density in the Current Proposed Variation.

Table: Impact on the proposed changes in Density

Table 4: Current Densities vs Proposed Densities

<i>Location</i>	<i>County Development Plan 2022-2028</i>	<i>Chief Executive Report Recommendation</i>	<i>Increase per HA</i>	<i>% Increase</i>
<i>Bray</i>	<i>40 per HA</i>	<i>73 per HA</i>	<i>33 Per Ha</i>	<i>83%</i>
<i>Wicklow/Rathnew / Greystones</i>	<i>30 per Ha</i>	<i>50 per Ha</i>	<i>20 per HA</i>	<i>67%</i>
<i>Level 3 – 5 CDP excluding Greystones</i>	<i>30 per Ha</i>	<i>35 per HA</i>	<i>5 Per Ha</i>	<i>17%</i>

There have been significant proposed changes in residential densities across the county, and it is crucial to develop a deeper understanding of the long-term consequences these changes will have on the character and functionality of our communities.

The viability of delivering these densities as proposed across the settlements remains uncertain. Each settlement's density must align with what the market is realistically willing to absorb. There is little value in constructing developments that do not meet market demand or cannot be sold. Ensuring that proposed densities are commercially viable is therefore critical to achieving sustainable growth and avoiding underutilised or vacant developments.

A detailed assessment of both net and gross areas is essential when calculating land requirements. It is necessary to make an informed estimate of the net area, considering factors such as geographical location and the services required—roads, open spaces, playing fields, community facilities, and so on. It is important to acknowledge that 100% of the land is not deliverable and a net density of 85% is proposed.

The proposed increases such as an 83% rise in Bray from 40 dwellings per hectare (dph) to 73 dph, and a 56% rise in Greystones and Wicklow/Rathnew from 30 dph to 48 dph are extremely ambitious and lack a realistic basis in current market conditions, development economics, or infrastructural capacity.

Such densities significantly exceed what has historically been delivered in these locations and do not reflect prevailing site constraints, market absorption rates, or the viability challenges already experienced by developers.

For these reasons, the proposed density targets are considered unrealistic, economically unviable, and ultimately undeliverable within the timeframe of the development plan. Inflated density expectations often lead to delays in planning applications, stalled sites, and a widening gap between theoretical housing capacity and actual output.

In effect, relying on such overstated density assumptions may exacerbate the existing housing crisis by creating a plan that appears robust on paper but cannot be translated into deliverable units on the ground.

I am proposing that Table 3.4 Future Housing Capacity Levels 1-6 settlements as of Q3 2025 and replace it with the densities that are in the Current Development Plan Core Strategy and at a net density of 85% of the gross area as proposed.

For this exercise I am excluding the following columns from the Table Phase 1/Priority 1, Phase 2/Priority 2, Estimated Capacity of Zoned and fully serviced land and Estimated Capacity of Zoned and serviceable land.

Table 5: Future Housing Capacity Based on the Current Development Plan Densities

Table 6: Revised Wicklow Core Strategy (Revised Housing Growth Targets for 2025 -2040 and the zoned land Provision) attached.

Table 5: Future Housing Capacity Based on the Current CDP Densities

A	B	C	D	E	F	G	H	I	K
		Units Under Construction	Units Permitted	Units Permitted but subject to current appeal	Total Units (Under Construction, Permitted yet to commence and subject of appeal/JR	Zoned Land with no live permission	Nett Density of 85% Proposed (=F* 85%)	Current CDP	Estimated capacity of zoned land with no live permissions (units) Current CDP (F*I)
1	Bray	157	575	135	867	101	86	40	3,434
2	Wicklow - Rathnew	502	639	-	1,141	59	50	30	1,505
	Arklow	58	854	-	912	99	84	30	2,525
3	Greystones - Delgany	264	209	3	476	45	38	30	1,148
	Blessington	664	142	-	806	46	39	30	1,173
	Baltinglass	69	69	-	138	5	4	30	128
4	Enniskerry	113	17	129	259	13	11	30	332
	Kilcoole	173	57	-	230	32	27	30	816
	Newtownmountkenedy	447	43	-	490	3	3	30	77
	Rathdrum	141	-	-	141	12	10	30	306
5	Ashford, Aughrim, Carnew, Dunlavin, Tinahely	117	191	-	308	59	50	22	1,103
6	Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh	63	23	-	86	31	26	20	527
	Total	2,768	2,819	267	5,854	505			13,071

Table 6 Wicklow Core Strategy (Revised Housing Growth Targets for Wicklow 2025-2031 and 2025-2040 and Zoned Land Provision

A	B	C	D	E	F	I	J	K	L	M
		Distribution of growth as a % of	New Housing Target 2025 - 2031	New Housing Target 2025 - 2040	Total Units (Under Construction, Permitted yet to commence and subject of appeal/JR	Nett New 2025 - 2031	Nett New Housing Target 2025 - 2040	Estimated capacity of zoned land with no live permissions (units) Current ODP Extract	Excess / Shortfall of Land Provision	
		Total Growth	Extract Table 2 Cumulative Requirement less	Extract Table 2 Cumulative Requirement less	Extract Table 5	(=D-F)	(=E-F)	Table 5	(=I-K)	(=J-K)
	County	Extract Table 3	100%	38,860						
1	Bray	23%	4,884	8,979	867	4,017	8,112	3,434	583	4,678
2	Wicklow - Rathnew	14%	3,053	5,613	1,141	1,912	4,472	1,505	408	2,968
	Arklow	20%	4,196	7,714	912	3,284	6,802	2,525	759	4,278
3	Greystones - Dalgany	15%	3,097	5,693	476	2,621	5,217	1,148	1,473	4,070
	Blessington	3%	687	1,264	806	119	458	1,173	1,292	715
	Ballinglass	2%	382	702	138	244	564	128	116	436
	Enniskerry	2%	329	606	259	70	347	332	261	15
4	Kilcoole	3%	698	1,283	230	468	1,053	816	348	237
	Newtownmountkenedy	3%	672	1,236	490	182	746	77	106	670
	Rathdrum	2%	392	720	141	251	579	306	55	273
	Ashford, Aughrim, Carnew,									
5		6%	1,225	2,252	308	917	1,944	1,103	187	841
	Dunlavin, Tineahely Avoca, Donard,									
6	Kilmacanogue, Newcastle, Roundwood, Shillelagh 7 to 10 Villages / clusters;	2%	399	734	86	313	648	527	214	121
	open countryside	5%	1,122	2,062						

Variation Process

The Variation is critical in determining our future and shaping the impact on communities. Decisions based on this report will influence settlement patterns, housing density, transport connectivity, and community infrastructure for decades. It will define where growth occurs, how services are delivered and the overall sustainability of development.

The Variation itself is highly technical and dense with tables, percentages, growth rates, and zoning data (e.g. Tables 6.2 and 6.3). It uses planning terminology such as headroom, phasing, and serviceable land, and references multiple policy layers (NPF, RSES, LAP, LFP).

Its structure, while logically organised, is fragmented. The volume of data (20+ tables) makes it difficult for non-specialists to interpret. Understanding the implications requires extensive cross-referencing between sections (e.g. comparing current CDP targets with new NPF targets and proposed variations).

Summary of the Tables

Table 1: Existing and New Annual Growth Requirements (including the additional provision of 50%)

Table 2: Total Growth Requirements 2025 – 2031 and 2025 – 2030 (including the additional provision of 50% less completions for Q1 and Q2 of 2025)

Table 3: Targeted Settlement Growth and Distribution

Table 4: Current Densities vs Proposed Densities

Table 5: Future Housing Capacity Based on the Current Development Plan Densities

Table 6: Revised Wicklow Core Strategy (Revised Housing Growth Targets for 2025 -2040 and the zoned land Provision).