



Variation No.6

Who are you:	Agent
Name:	Armstrong Fenton Associates
Reference:	VAR6-093748
Submission Made	January 16, 2026 9:38 AM

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 Dwyer Nolan Developments Ltd we are making a submission regarding the proposed revised Core Strategy and housing targets. Please refer to our attached report.

Upload a File (optional)

Season Park_NMK.pdf, 3.31MB



15th January 2026.

Variation No.6,
Administrative Officer,
Planning Section,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96.

Re:

PROPOSED VARIATION NO. 6
to the
Wicklow County Development Plan 2022-2028

Dear Sirs,

We act on behalf of our client Dwyer Nolan Developments Ltd., of Stonebridge House, Stonebridge Close, Shankill, Co. Dublin, who are the owners of land in the townland of Seasonpark in Newtownmountkennedy, Co. Wicklow.

On our client's behalf, we wish to make this submission towards the Proposed Variation No. 6 to the current Wicklow County Development Plan, 2022-2028 (hereafter "CDP"), which is currently on public display. We understand that this proposed variation to the CDP seeks to revise the Core Strategy and associated housing targets of the current CDP in order 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).

We have read the content of both the Proposed Variation No. 6 and the Section 28 Ministerial Guidelines "NPF Implementation: Housing Growth Requirements" that were published by the Minister last July, and the following sets out our comments on the Proposed Variation No. 6.

1.0 Context

1.1 Dwyer Nolan Developments Ltd is the owner of approx. 19.5 hectares (48 acres) of land in the townland of Seasonpark, south of Season Park Road (L1037), on the north-western edge of Newtownmountkennedy (hereafter "NMK") town centre – refer to figure 1 below to identify the subject lands. The lands are bounded by agricultural lands to the west, while lands to the south have an extant permission for residential development under Ref. 24154, i.e. a Large-scale Residential Development (LRD) comprising amendments to the previously permitted application (WCC Ref. 06/6101/ ABP Ref. PL27.227704, as extended by WCC 18/381).

1.2 The Western Distributor Road, part of which runs through our client's lands and extends south of same, has been delivered. The long established Season Park housing estate is located to the east, while new housing at Altidore Gardens also lies east of the aforementioned distributor road. On the north side of Season Park Road are Coillte lands, including their head office.



Fig. 1 – Subject lands identified & outlined by the solid red line - (Source: Google Maps)

2.0 Planning Context

2.1 Under the existing CDP, Newtownmountkennedy is identified as a Level 4 - 'self-sustaining town' which are defined as '*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*'. The Proposed Variation No. 6 does not alter the status of Newtownmountkennedy in the settlement hierarchy for the County.

2.2 Under the existing CDP, the subject lands have a mixture of land use zonings attached to them as follows:

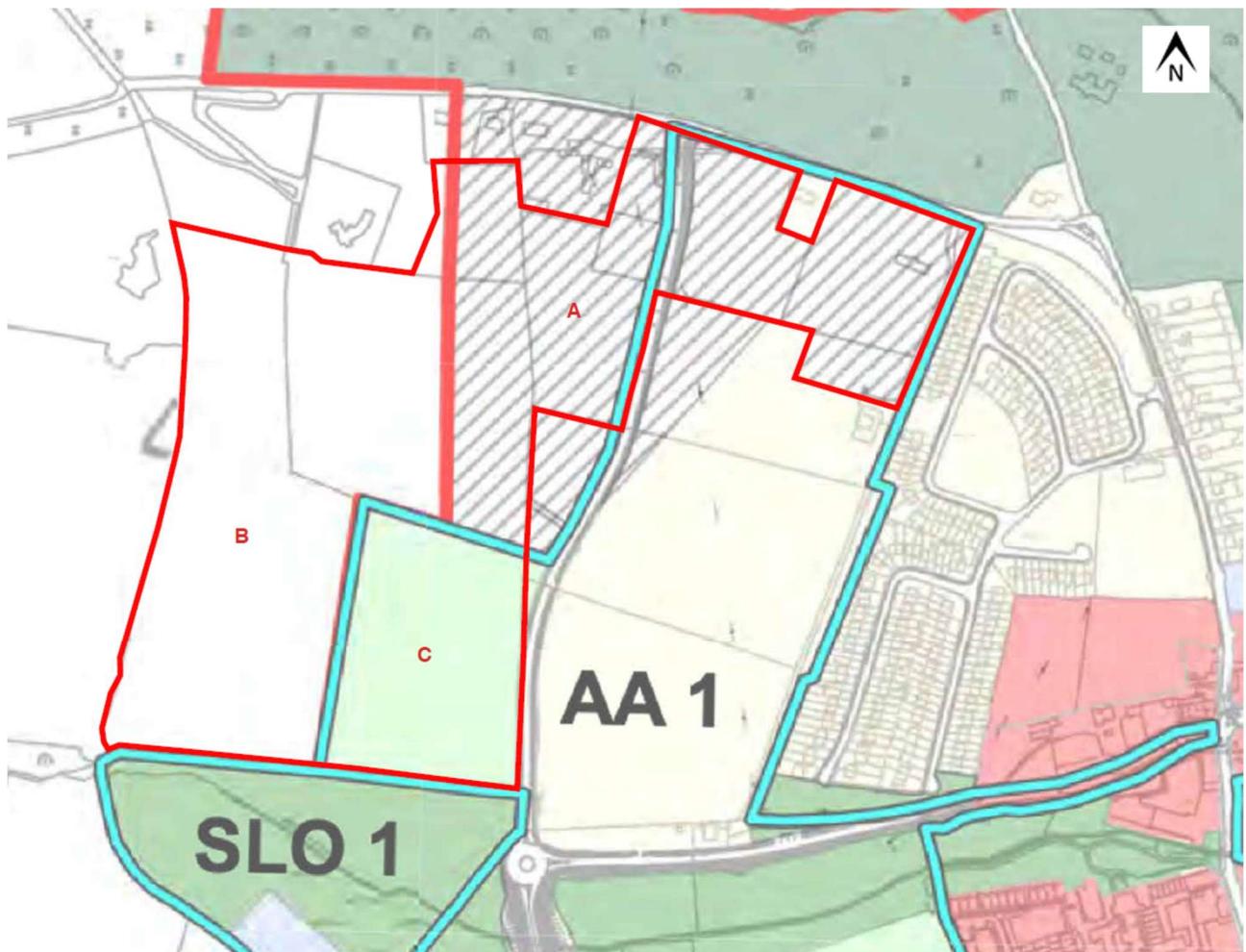
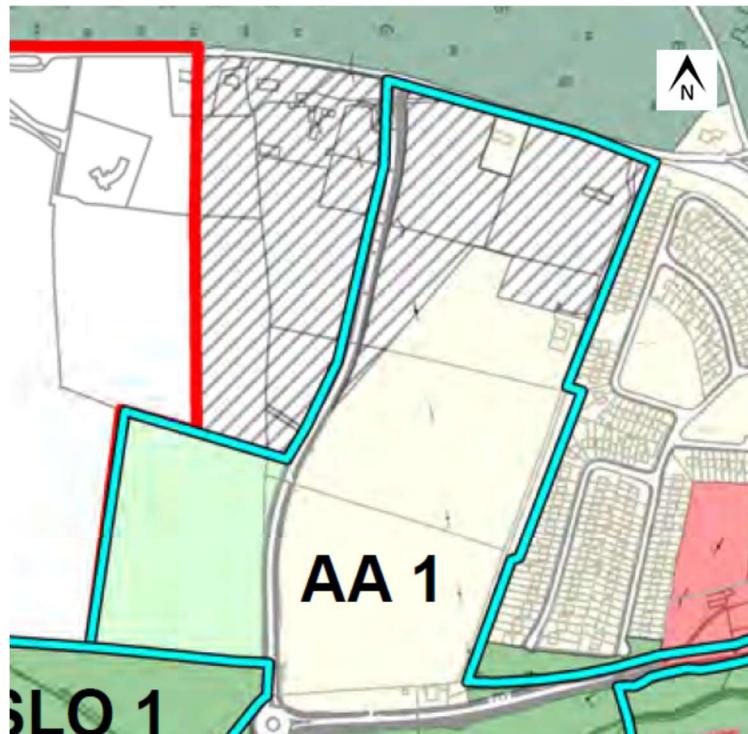


Fig. 2 – Subject lands outlined by the solid red line

- Lands identified as A - SLB-Strategic Land Bank (c. 8.2 hectares),
- Lands identified as B – White lands / Unzoned (c. 8.2 hectares),
- Lands identified as C - AOS-Active Open Space (c. 3.1 hectares),
- Total = c.19.5 hectares.

It should also be noted that the north-eastern portion of our client's lands are identified as being within Action Area Plan 1: Monalin – Season Park (i.e. AA 1). The CDP states that this action area is located to the west of Main Street in the townlands of Newtownmountkennedy, Season Park and Monalin and is bounded to the north by local road L1037 (Season Park) and to the south by the Roundwood Road (R756). This action area measures c. 47Ha. Aside from our client's lands with AA1, the remainder of the AA1 lands are either built out or subject to an extant permission(s).



AA-Action Area, OP-Opportunity Sites & SLO-Specific Local Objectives

Fig. 3 – Part of Dwyer Nolan lands contained within AA 1, outlined in red

2.3 It should be noted that part of our client's lands were the subject of a Strategic Housing Development (SHD) planning application in 2022, for 179 no. dwellings and crèche (189.9m²), with community use facility overhead (99.45m²) in a 3 storey building, including access via (i) a new vehicular entrance point off Season Park Road to the north, and (ii) via a proposed road extending south and east of the proposed housing, connecting into Main Street, Newtownmountkennedy at Fisher's Corner (as previously permitted under Ref.s 06/6101 & PL27.227704) – refer to Fig. 4 overleaf to see the site layout plan for the SHD. This application was deemed appropriate by An Bord Pleanála, with the Board issuing a decision to grant permission for same under planning Ref. ABP-313208-22 in August 2022. However, this decision has since been the subject of a Judicial Review and has been remitted back to An Coimisiún Pleanála for decision (Case reference: TA27.319816), which we currently await.



Fig. 4 – Site layout plan for 179 no. dwellings & creche etc.

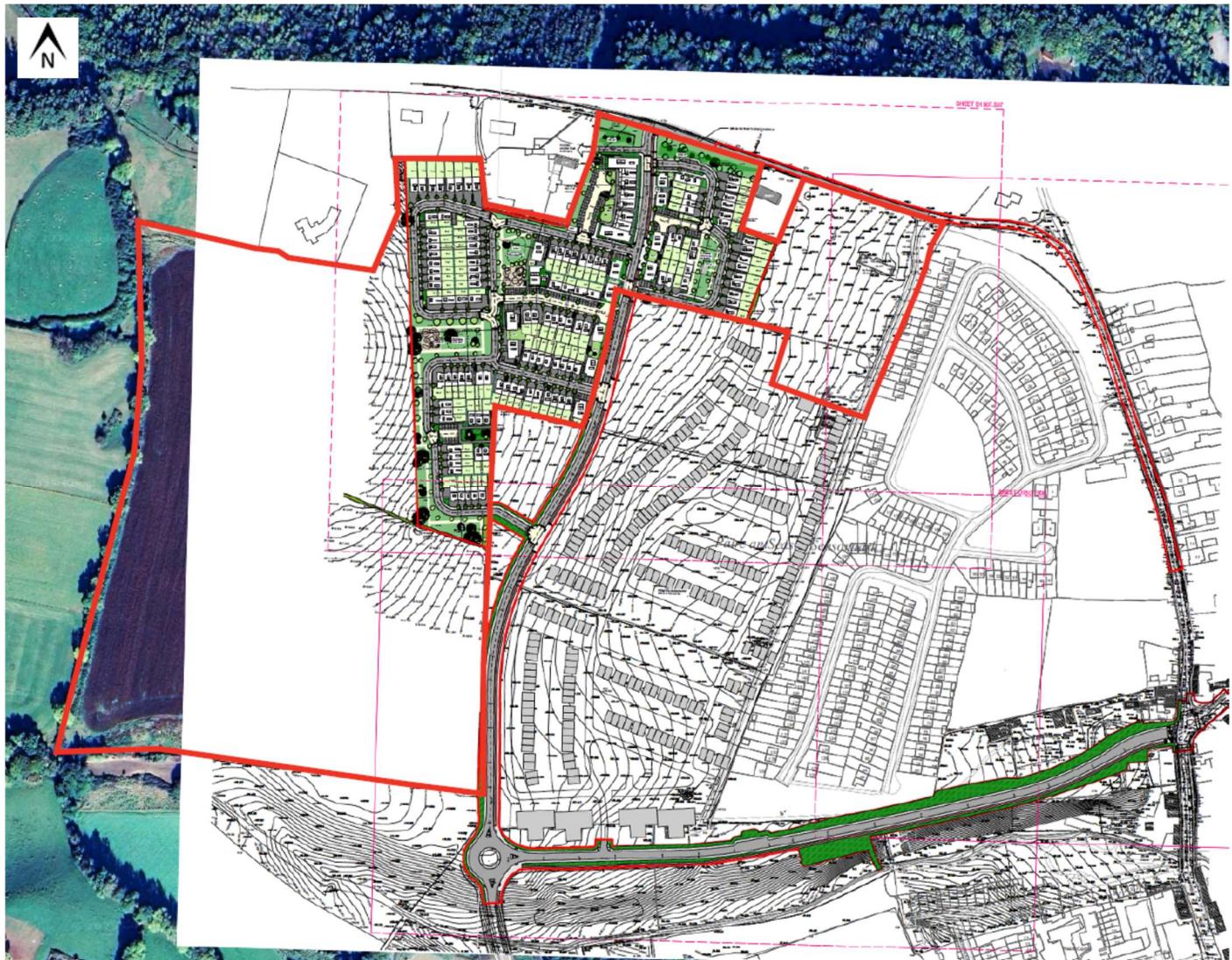


Fig. 5 – Site layout plan for 179 no. dwellings in the context of our client's overall landholding, as outlined in red.

2.4 The east-west access road connecting the AA1 lands to the town centre at Fishers Corner / Road has been completed, with this road known as Monalin Road, as has the north-south road connecting the AA1 lands to local road L1037 (Season Park). Therefore, the roads infrastructure required to serve all of the AA1 lands is now complete and operational and there are no roads infrastructure impediments to the future development of the subject lands for housing.

2.5 We have examined the National Policy Objectives set out in the 2025 Revised National Planning Framework (NPF) which is the Government's high-level strategic plan for shaping the future growth and development of the country out to the year 2040. A key element of the NPF's strategy is compact growth with one of the key features being "*Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas*". The NPF sets out a number of objectives that promote coordinated spatial planning and sustainable use of resources and protection of the environment which include *inter alia*:

- **National Policy Objective 7** - 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;
- **National Policy Objective 12** - Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being;



- **National Policy Objective 42** - To target the delivery of 50,000 additional households to 2040;
- **National Policy Objective 43** - Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

2.6 The recently published S.28 Guidelines “*NPF Implementation: Housing Growth Requirements*” clearly state that “*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*”, and that the “*housing growth requirement figures for each local authority are provided in the form of an annualised estimated housing figure for two time periods (2025 to 2034 and 2034 to 2040)*”. As outlined above, the Proposed Variation No. 6 to the current CDP is in response to the publication of the aforementioned S.28 Guidelines. We note that under Appendix 1 of these S.28 Guidelines that Wicklow County Council is to target the delivery of 2,068 no. dwellings annually to 2034, and a further 931 no. dwellings annually from 2035 to 2040. Accordingly, Table 3.1 “*Housing Targets for County Wicklow 2025-2040*” of the Proposed Variation No. 6 sets out the new housing unit targets for the County for the duration of the current CDP up to Q2 2028, for a further period up to Q4 2031 and the longer term up to 2040. This equates to 26,266 no. dwellings up until 2040 for the entire County.

2.7 Under the ‘*Regional Spatial and Economic Strategy*’ (RSES) published by the Eastern and Midland Regional Assembly in 2019, NMK is located within the ‘*hinterland area*’ as defined by the RSES. Therefore, in accordance with the 2024 Sustainable Residential Development and Compact Settlements Guidelines, our client’s lands at Season Park can be described as being located within a Small and Medium Sized Town (1,500 – 5,000) population (Note: the 2022 Census Population of NMK is 3,539 persons), and as per the Compact Settlements Guidelines i.e. Table 3.6 of same, the subject lands can be considered to be categorised as a “*Small / Medium Town Edge*” site given its greenfield nature at the edge of the existing built-up area of NMK. In accordance with the aforementioned Table 3.6, densities in the range of 25 dph to 40 dph shall be generally applied at the edge of small to medium sized towns. At a minimum this would equate to c. 487.5 units up to a maximum of c.780 units being accommodated on the subject lands, which is likely to be in the form of a mix of houses, apartments and duplex units.

2.8 The Proposed Variation No. 6 to the current CDP proposes new housing targets which are taken as “*minimum levels of housing to be supported by zoning / development objectives in the 2025-2031 period*”. Table 3.3 “*Targeted Settlement Growth 2022-2031*” of Proposed Variation No. 6 proposes housing growth for NMK between 2022 – 2031 of 892 no. dwelling units and acknowledges that “*Newtownmountkennedy is well located with respect to the Metropolitan Area to absorb housing demands arising from the north of the County*”. We also note that the Proposed Variation No. 6 states that “*Having regard these new housing growth objectives, 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 Table 3.4*”.

2.9 Table 3.4 “*Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)*” of the Proposed Variation No. 6 states that there are 3 hectares of zoned land in NMK with no live permission and that only 77 no. dwellings (all on Phase 1 zoned lands) can be delivered, which would equate to a gross density of c.25 units per hectare. Table 3.4 takes into account units permitted but not yet commenced, with 43 no. such units having an extant permission in NMK, and an additional 447 no. units under construction as of Q3 2025. Taking into account, those under construction, those permitted and the available capacity for 77 no. additional units, this brings the total of potential future housing in NMK to 567 no. dwellings. This is clearly a shortfall from the housing growth figure for NMK of 892 no. dwellings during the period of 2022-2031 (a difference of 325 no. dwellings).

2.10 The Proposed Variation No. 6 acknowledges that there is capacity for the development of a total of c. 21,500 – 25,500 units for the entire County under the provisions of the current CDP and existing local plans as of Q3 2025, and that “*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)*” which requires 26,266 no. dwellings up until 2040 for the entire County.

2.11 Table 3.5 of the Proposed Variation No. 6 provides “Revised Housing Growth Targets for County Wicklow 2025-2031 and zoned land provisions (Levels 1-6)” which are stated to be the “*new target 2022-2031 as set out in Table 3.3, less the units already delivered from Q3 2022 to Q2 2025*”. Table 3.5 provides that the new housing target figures for NMK for the period 2025-2031 is 545 no. units, which includes the 447 no. under construction, and the 43 no. subject to an extant permission(s), thus leaving an additional 55 no. units required to be delivered in NMK by 2031. This is less than the figures cited in Table 3.4 which provides for 77 additional / new units in NMK which we assume to be the projection until 2028 as the existing Table 3.4 of the current CDP outlines sets out settlement population targets until 2028. If correct, 22 less units are envisaged to be delivered in NMK by 2031 than in 2028.

2.12 Our client is a well-known house builder, who has delivered thousands of dwellings in Wicklow and Dublin, including the Glenbrook development and Parkview Hotel in the centre of NMK. Our client is currently delivering housing in the administrative areas of Dublin City Council and Fingal County Council with over 1,000 units currently under construction. Should the subject lands at Seasonpark be zoned in the future, the Planning Authority can be assured that permission for residential development will be sought immediately and upon a grant of permission for same, the permitted development will be carried out in its entirety, thus delivering much needed housing. This is further reinforced by their genuine intention to deliver 179 no. dwellings as applied for under the SHD application submitted in 2022.

2.13 The undeveloped lands at Seasonpark are ideally located for the provision of medium density housing (at an average of e.g. c.35 units per hectare) in line with national guidance (i.e. Compact Settlement Guidelines and Table 3.5 of same) which will satisfy the current demand, deliver long term sustainable housing at an efficient density and will complement the overall character and pattern of development in the area, thus completing the development of the AA1 lands that have been designated as such since 2006.

2.14 Under the 2008 Newtownmountkennedy Local Area Plan (NMK LAP) a significant portion of the subject lands were zoned objective ‘R1: *Proposed Residential*’, the objective of which is: “*To protect, provide and improve residential amenities*” – refer to Fig. 6 overleaf which outlines the subject lands in purple on the 2008 NMK LAP map. Our client’s lands that were previously zoned R1 equate to c.8.2Ha in area. As outlined above, the LAP identifies five action areas, with the subject lands at Seasonpark located within action area 1 (AA1). Fig. 6 overleaf also identifies that the majority of the lands zoned R1, particularly in AA1 under the LAP are committed in terms of either extant planning permissions or have been developed as housing. Furthermore, the critical infrastructure required, such as the road network has also been delivered. The current 2022-2028 CDP effectively de-zoned our client’s lands that were previously zoned under the LAP as R1 – proposed residential, notwithstanding the fact that a SHD development had been deemed appropriate by An Bord Pleanála.

2.15 Under the current CDP and its Core Strategy, NMK is identified as having a population of 3,552 persons in 2016, with the 2022 Census figures stating the population of the urban area of NMK is 3,539 persons. The urban area of NMK is identified overleaf in Fig. 7, taken from the CSO website “Census 2022 Urban Profiles”, which confirms the 2022 population of NMK as being 3,539. The CDP identifies NMK as a self-sustaining town along with 4 other towns, which are to be allocated 12% of the total growth for the County. The new Section 28 Ministerial Guidelines “*NPF Implementation: Housing Growth Requirements*” set out that Wicklow will grow by 2,068 units per annum between 2025 to 2034, which would equate to 20,680 units in total up until 2034. A further 931 units per annum is to be achieved between 2035 and 2040, this would equate to 5,586 units up until 2040. The total figure equates to 26,266 no. units between 2035 and 2040, as affirmed by Table 3.1 of the Proposed Variation No. 6.

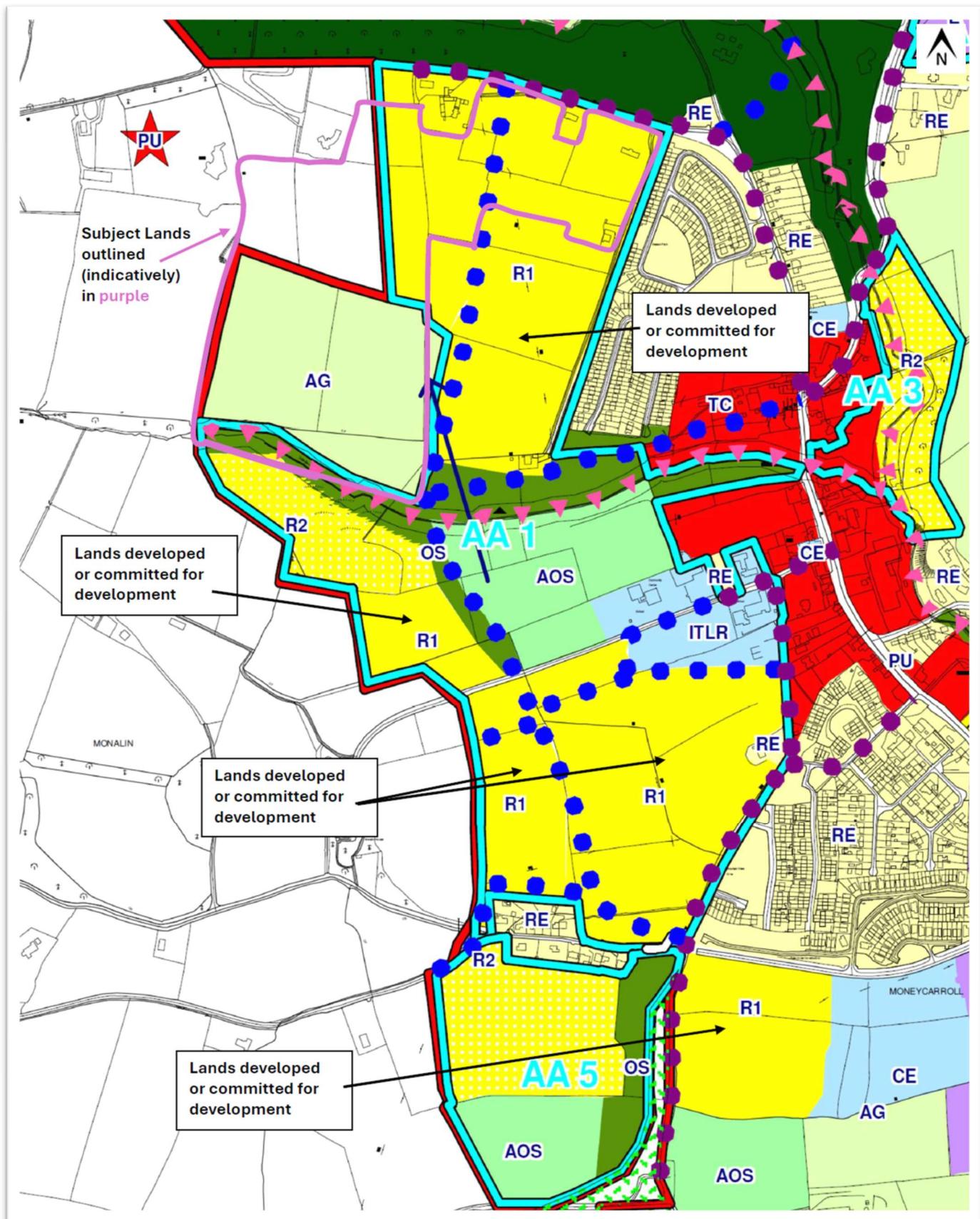


Fig. 6 – Extract of 2008 Newtownmountkennedy LAP zoning map with subject lands outlined indicatively in purple.

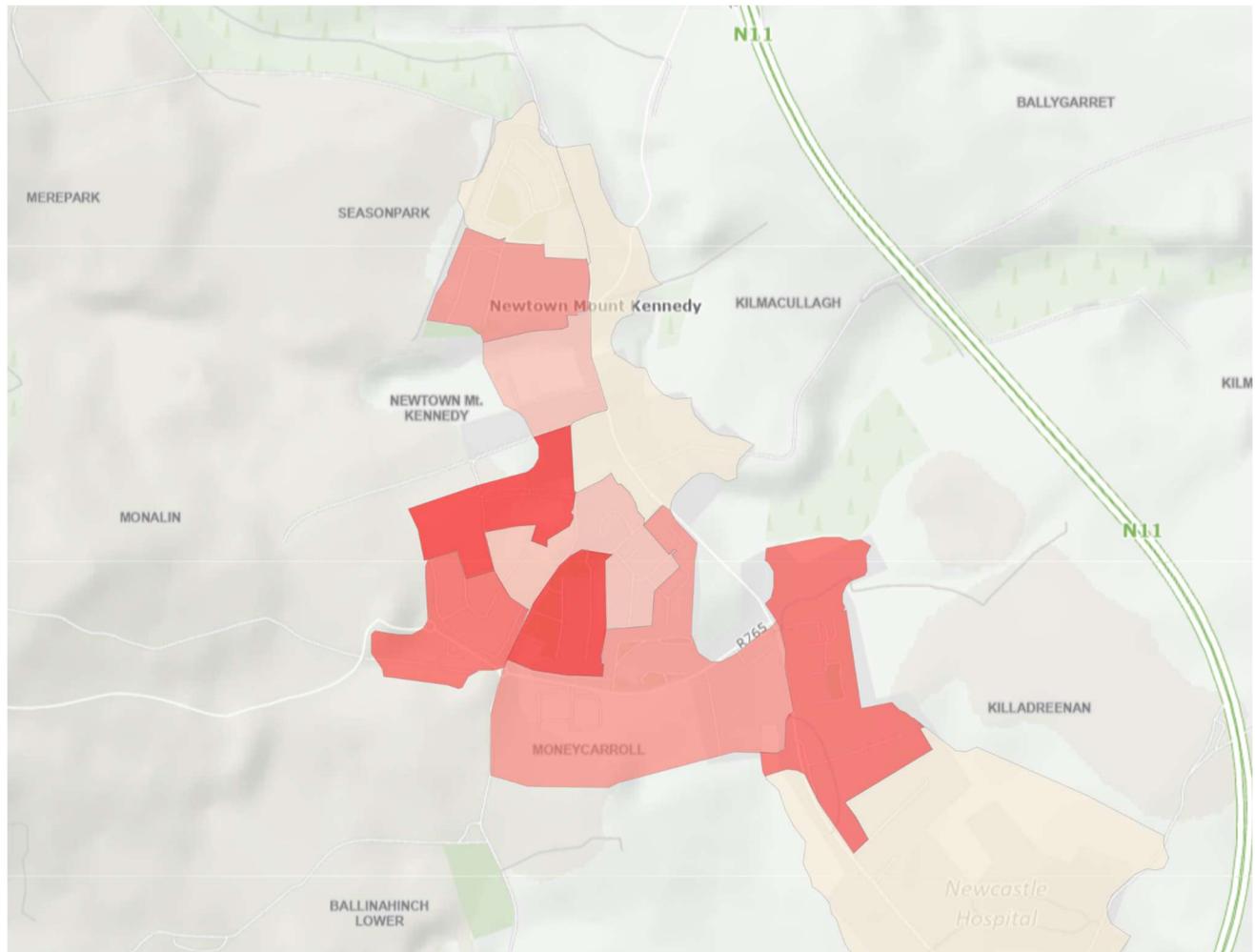


Fig. 7 – NMK Urban Area from 2022 Census – Source: www.cso.ie

2.16 Assuming NMK is to be afforded part of the growth for County, it is considered that our client's lands can accommodate the new housing growth figures for NMK. As a significant proportion of our client's lands at Seasonpark were previously zoned for residential use, and are zoned "Strategic Land Bank", it is now an appropriate juncture to consider these lands for the delivery of much needed housing. We estimate that based upon the figures set out in the new Guidelines, that up until 2034, NMK will have to accommodate c.50 no. units per annum, which equates to c.500 units between 2025 and 2034. However, we note the following:

- Table 3.1 of the Proposed Variation No. 6 states that the housing growth figure for NMK between 2022 – 2031 is 892 no. dwellings.
- Table 3.4 of the Proposed Variation No. 6 states that 447 no. units are under construction with a further 43 having permission but not yet commenced, and that an estimated 77 no. units on 3 hectares (at a gross density of c.25 units per hectare, which does not comply with the Compact Settlements Guidelines) may be delivered in NMK.
- Table 3.5 of the Proposed Variation No. 6 states that 545 no. units are targeted in NMK between 2022 – 2031, less the 447 under construction and 43 that have permission with 55 units required until 2031.

2.17 It appears that there are discrepancies in the figures stated in the Proposed Variation No. 6 with a shortfall of 347 no. dwellings (i.e. 892 – 545 = 347) to be delivered until 2031 in NMK, which would equate to c.70 units per annum, with an estimated max total of 77 new units envisaged to be delivered in NMK during the same period. Given the location, planning history, zoned status of the subject lands, and surrounding planning context of adjoining lands, as well as infrastructural capacity, it is put forward that our client's lands at Seasonpark can adequately accommodate the shortfall in housing units for NMK.

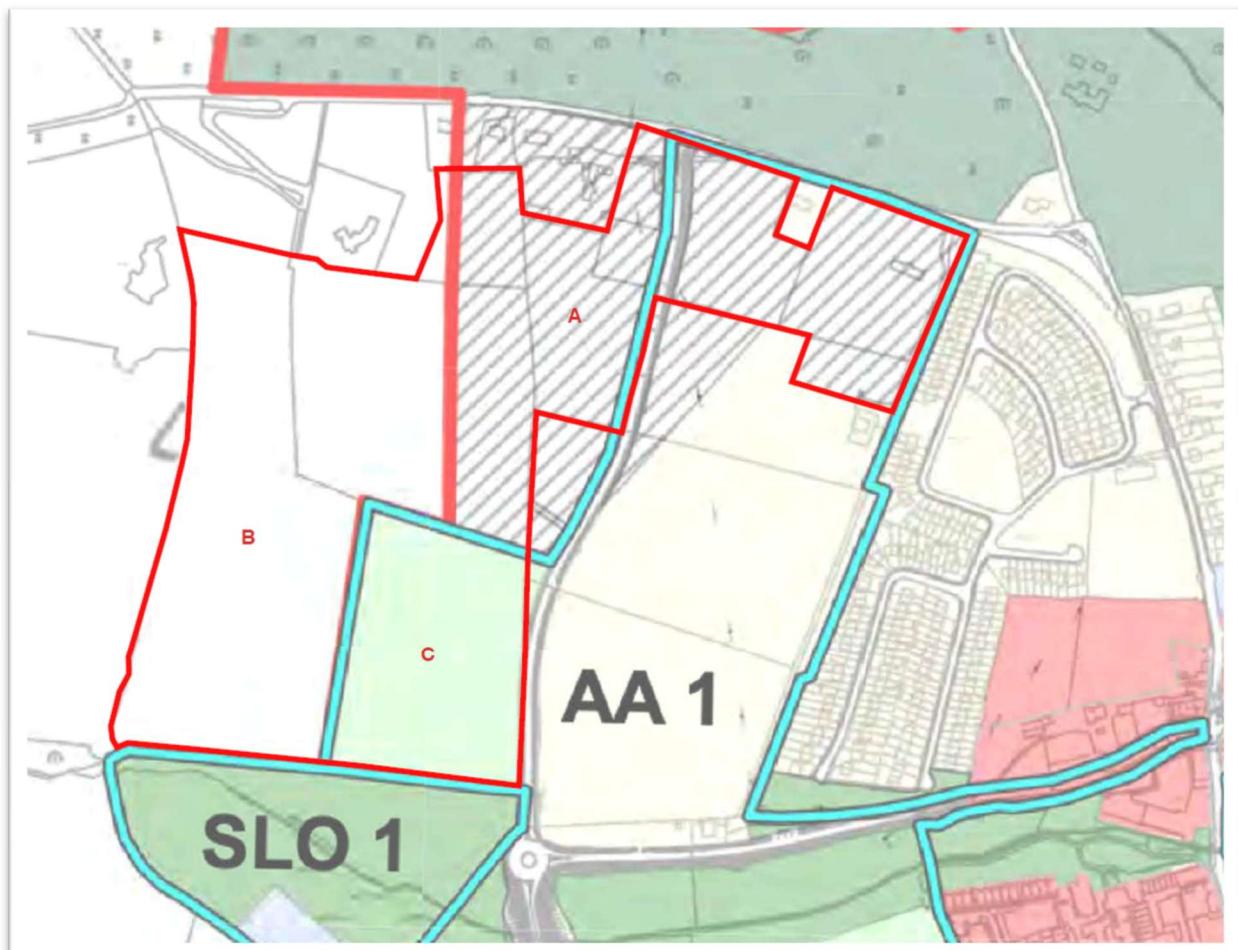


Fig. 8 – Lands marked “A” currently zoned “SLB - Strategic Land Bank” can accommodate future housing upon rezoning to “RN – New Residential”

2.18 It is also put forward that in the short term, the remainder of our client's lands (identified as B and C in Figure 8 above) ought to be zoned Strategic Land Bank to provide for housing in the future, in a consolidated manner. These lands are best placed to accommodate additional housing in NMK that may be required up to 2040, in accordance with the Government's plan to deliver c.50,000 dwellings per annum. Should other lands in NMK not deliver the required housing, then at a minimum, our client's lands can accommodate same and this ought to be considered in adoption of the final Core Strategy figures as part of Proposed Variation No. 6 and any future variation to the existing CDP for rezoning of land to accord with the S.28 Guidelines issued by the Minister in July 2025.



3.0 Infrastructural Services / Requirements

3.1 Roads / Public Transport Considerations

As per the Action Area Plan requirements, the roads infrastructure to serve all of these lands, including our client's lands at Seasonpark have been delivered. The previous LAP accounted for the need for pedestrian and cyclist connections via the new roads infrastructure, part of which runs through the subject lands, thus providing for adequate access arguments from the AA1 lands to and from the centre of NMK.

The delivery of the necessary roads infrastructure to serve the subject lands ensures the lands have proximate access to bus services in the town centre, which include links to high quality, frequent public transport options that are accessible on route to Dublin City and Wicklow Town via the main line rail links. The recently launched bus connects services (i.e. L1 route from NMK to Greystone Station and Bray Station) provides bus services every 30 minutes. The proximity of the lands to a wide range of public transport services / options will enable sustainable commuting for future residents while new residential development in the area will support such investment in public transport infrastructure.

3.2 Drainage Services

Based upon the approval of the previous SHD in principle for 179 no. dwellings, there are no infrastructural impediments to servicing the subject lands. Irish Water confirmed that water supply connections were feasible subject to infrastructure upgrades to be facilitated by the developer. Furthermore, it is expected that the NMK pumping station will be upgraded by 2026. In addition, under the previous SHD application, Irish Water issued a design acceptance statement for that development, but we understand that Irish Water are undertaking works to increase capacity to serve development growth in the area.

3.3 Flood Risk

Having checked the OPW flood maps, there is no known flooding on the site, however, the development must be strategically planned in order to mitigate any known risk and take cognisance of any associated areas, which may be affected by flood waters. We note that in the Strategic Flood Risk Assessment for the current County Development Plan the subject site is not at risk of flooding, and is not located in Flood Zone A or B.



4.0 Conclusion

4.1 In complying with the Minister's request to effectively deliver more housing and zone more lands, the existing development potential of our client's lands at Seasonpark ought to be considered when preparing the revised Core Strategy of the current CDP.

4.2 We also note that in their letter dated 11th December 2025 to all City and County Councils, the Minister for Housing, Local Government and Heritage, James Brown and the Minister of State for Local Government and Planning, John Cummins stated that it was important to note that "*in identifying lands that are suitable for residential development, deliverability in the near term i.e. the variation period, must be a key consideration. This means that: -*

- *Lands that are services or readily serviceable should be prioritised for zoning and activation;*
- *Realistic and deliverable residential density assumptions should be applied in accordance with the Guidelines for Sustainable Residential Development and Compact Settlements (2024), with net densities generally comprising 65-80% of the gross area required for zoning purposes; and,*
- *The phasing and sequencing of zoned lands should not be a constraint that cannot be readily addressed within the variation period".*

4.3 Taking the above into account it is respectfully put forward that realistic numbers of housing in line with the Minister's targets need to be applied to Newtownmountkennedy and that is doing so the delivery of same on our client's lands at Seasonpark also be considered, for the following reasons:

- i. The lands are located a short distance from the centre of Newtownmountkennedy, with a considerable proportion of same (over 8 Ha) zoned for residential land use for many years, up until the adoption of the current CDP in 2022.
- ii. Part of the subject lands were put forward for permission for a Strategic Housing Development (SHD) for 179 no. dwellings, creche, community space, open spaces etc. which was approved by An Bord Pleanála and has been remitted to An Coimisiún Pleanála on foot of judicial review proceedings.
- iii. All of the necessary roads infrastructure as originally envisaged in the 2006 Action Area Plan has been delivered, therefore there are no roads infrastructural impediments to developing or accessing the subject lands. Similarly, it is considered that the appropriate drainage infrastructure can be delivered to serve future housing on these lands.
- iv. The subject lands at Seasonpark can be developed in the future at an appropriate density to deliver much needed housing within an existing urban area in close proximity to existing local service provision and transport infrastructure, which would consolidate housing development in the environs, particularly given the extant permission on adjoining lands.
- v. The development of these lands for residential land use is a sustainable option for this underutilised land, particularly in light of the planning history attached to same, the location of the land in proximity to the town, existing infrastructure already delivered, and the ultimate completion of the action area plan that was agreed c. 20 years ago.
- vi. The site is accessible and serviceable and given our client's track record for delivering housing in the County, the Planning Authority can be assured that upon a future zoning of the site for residential land use, a planning application will be prepared immediately and upon a grant of permission for same, developed and delivered as new housing.



4.4 We request that all of the above be given judicious consideration at this opportune time of considering new housing target figures, at this time of a national housing crisis. We are happy to meet and discuss this further, should the Planning Authority consider it necessary / appropriate.

Yours sincerely,


Tracy Armstrong, BA, MRUP, MIPI, MRTPI
Chartered Town Planner
Armstrong Fenton Associates.

A