



Variation No.6

Who are you:	Agent
Name:	Crowley Residential
Reference:	VAR6-141944
Submission Made	January 16, 2026 2:21 PM

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- Chapter 1 – Proposed Variation No. 6

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TOWN PLANNING SUBMISSION



PROPOSED VARIATION NO. 6 OF THE WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028

Lands to the West of the R750
(Folio WW14052F),
Dunbur Lower,
Wicklow,
Co. Wicklow

January 2026

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HUGHES
PLANNING
& DEVELOPMENT CONSULTANTS

1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2, have been instructed by our client, Crowley Residential, to make a submission on the Proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 (as varied) which intend to give effect to the Ministerial Guidelines published in accordance with Section 28 of the Planning and Development Act 2000 (as amended). This particular submission pertains to Lands to the West of the R750, Dunbur Lower, Wicklow, Co. Wicklow (Folio WW14052F).

These lands will also form part of a submission on the council's 'Call for Sites' which concludes in February 2026.

The NPF Implementation: Housing Growth Requirements Guidelines for Planning Authorities "the Guidelines" constitute Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended) ("the Act") were published in light of the recent approval of the revised National Planning Framework (NPF) and the establishment of the Housing Activation Office. It notes that housing is the Government's top priority and states that both local and national governments need to accelerate the delivery of housing.

In accordance with Section 13(2)(b) of the Planning and Development Act 2000 (as amended), the Proposed Variation was published for public consultation for a period of 6 weeks. This submission has been prepared in response to a public notice dated 5th December 2025 inviting submissions from third parties and interest parties, up until 16th January 2026, in relation to the proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028.

Wicklow County Council state that the proposed variation includes the following overarching policy amendments:

'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).'

And

'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.'

The Proposed Variation notes that the combined additional housing growth requirement for County Wicklow 2020-2031 is up to **17,908 additional residential units** as set out in Figure 2.0 below. This is including the additional provision of 50% over and above the housing growth requirement set out by the Government directive.

Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement to 2034	New Annual New Housing Growth Requirement 2035 to 2040
Wicklow County Council	745	1,411	2,068	931

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**.

Figure 1.0 Additional housing growth requirements for County Wicklow.

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)
1	Bray	5,526	157	575	135	4,659	62	101
2	Wicklow - Rathnew	3,170	502	639	0	2,029	41	59
3	Arklow	3,793	58	854	0	2,881	67	99
	Greystones - Delgany	1,717	264	209	3	1,241	25	45
	Blessington	806	664	142	0	0	0	0
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
5	Ashford, Aughrim, Carnew, Dunlavin, Tinahely	489	117	191	0	181	7	32
6	Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh	206	63	23	0	120	5	14
	Total	17,908	2,768	2,819	267	12,054	234	401

Figure 2.0 Extract of proposed Core Strategy outlining future housing growth targets for County Wicklow 2025-2031 and zoned land provisions, including the 50% additional provision.

The Minister has urged local authorities to “immediately take every step possible at this juncture to prepare for housing growth,” and to “consider at pace the most suitable locations and opportunities for new housing development... where delivery is most likely to occur and where infrastructure and services are available, or may be readily provided.” The subject lands are ideally situated to meet these criteria, being well-positioned relative to existing infrastructure and capable of early activation.

Policy and Objective 1 of the Guidelines states:

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

The lands in question are:

- Readily serviceable, with existing access to infrastructure.

- Not located in a designated flood zone.
- Well-located relative to Wicklow town centre, public transport, and community amenities.
- Capable of delivering housing at pace, in line with the objectives of the recently issued *NPF Implementation: Housing Growth Requirements* guidelines.

We respectfully request that the local authority give full consideration to the inclusion of these lands as part of the necessary review of development plans, in keeping with the Minister's directive and the shared goal of accelerating housing supply.

2.0 Submission Lands

The subject lands comprise a land parcel of c. 12.1 hectares and are situated adjacent to the townlands of Wicklow on the southern edge. The Wicklow town centre is located c. 2.2 km to the north, accessed via the R750 regional road. The subject site is located to the west of the R750 regional road, with agricultural lands immediately adjacent to the north, south, east and west boundaries. Further to the north, on the other side of an agricultural field, is the residential development of Dunbur Lower. Residential housing stock in the surrounding area comprises of both new and established residential developments. We note that much of the housing stock in the wider area was built in the last 30 years.

In terms of location, it is considered that the lands are strategically positioned in close proximity to existing services. With respect to public transport, the lands are located c. 2.1 km from the nearest bus stop, which is served by the 131 route between Bray and Wicklow, the 133 route between Dublin (Busáras) and Wicklow, the 740A route between Dublin Airport and Gorey, and the UM11 between Maynooth and Gorey. The subject site is also located a c. 9 minute drive from the Wicklow Train Station, which is served by the InterCity Train between Dublin and Rosslare Europort. The M11 motorway is located c. 5km (c. 11 minute drive) from the subject site, which provides direct access to Dublin City Centre.



Figure 3.0 Aerial image showing the subject site (red outline) in the context of the immediate locality (Folio WW14052F)

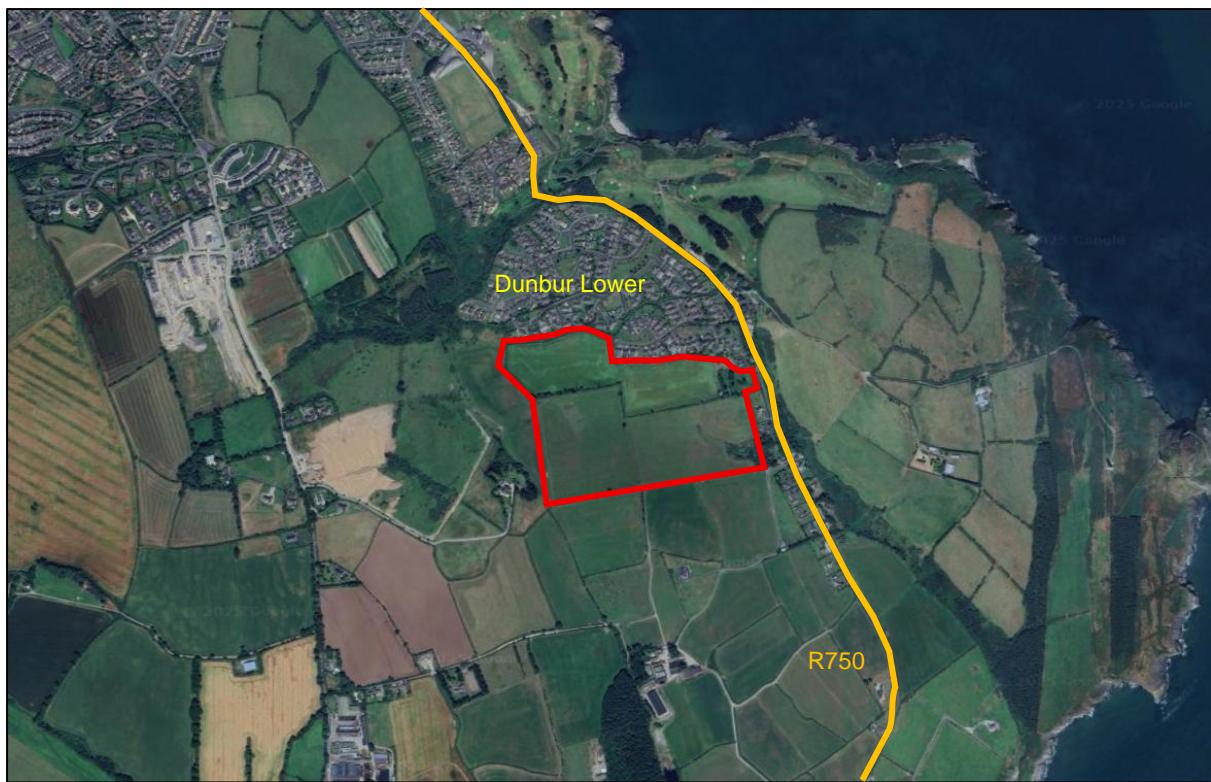


Figure 4.0 Aerial image showing the subject site (red outline) in the context of the wider locality.



Figure 5.0 Streetview image showing the existing access to the subject lands off the R750, which is adjacent to the existing urban edge of Wicklow.

As noted in the images below and overleaf, the subject site is about to be consumed by the extending urban area of Wicklow. The surrounding lands are fully serviced, and residential development is ongoing.

Service/ Infrastructure Type	Available
Water	
Electricity	
Roads	
Public Transport	
Schools	
Community Facilities and Infrastructure	

Table 1.0 List of services and infrastructure available for the subject lands

Land to the north of the subject site is characterised by residential development, consisting of dwellings and associated buildings.

3.0 Planning History

This section provides an overview of the planning history for the subject landholding as well as planning precedents for medium and larger-scale residential developments within the immediate area surrounding the subject lands.

3.1 Subject Site

A review of the Wicklow County Council planning register found no planning permissions relating to the subject lands.

3.2 Relevant History of Adjoining Properties

The following applications for development on sites immediately adjacent to the submission lands are of note:

Dunbur Lower, Wicklow, Co. Wicklow

Reg. Ref. 976488 Planning permission granted by Wicklow County Council on 10th December 1997 for development consisting of change of house type and site layout on sites 1-63 including on approved site (92/8351) together with 6 no. additional houses on sites 64-69 and water.

Reg. Ref. 941084 Planning permission granted by Wicklow County Council on 17th August 1995 for development consisting of 33 dwellings, service road and ancillary works.



Figure 6.0 Drawings showing the proposed development, as granted by Wicklow County Council under Reg. Ref. 941084.



Figure 7.0 Drawings showing the proposed development, as granted by Wicklow County Council under Reg. Ref. 941084.

Reg. Ref. 989144 Planning permission granted by Wicklow County Council on 30th March 1999 for a housing development consisting of 32 no. dwellings and ancillary site development works.

Greenhill Road, Wicklow, Co. Wicklow

Reg. Ref. 191273 Planning permission granted by Wicklow County Council on 26th March 2020 for development consisting of 36 no. houses and all associated works. The

accommodation shall consist of 12 no. 12 bed houses (two storey) and 24 no. 3 bed houses (two storey).



Figure 8.0 Site location map, as approved by Wicklow County Council under Reg. Ref. 191273.

The Planners Report noted the following:

'The Authority should be satisfied that the proposal is the most efficient use of these lands in terms of density, layout and tenure mix. Consideration should be given to the provision of additional units in the undeveloped area at the southern end of the site adjoining Block 7, with frontage from any additional units to be provided along the Greenhills road.'

4.0 Submission on Variation No. 6 to Wicklow County Development Plan 2022-2028

Wicklow County Council have prepared Variation No. 6 to the current Development Plan, to align with NPF Implementation: Housing Growth Requirement Guidelines for Planning Authorities (2025). Our clients lands to the West of the R750, Dunbur Lower, Wicklow, Co. Wicklow, are readily available for development and are an excellent example of lands which can be quickly released for development in line with the requirements of the Government.

The approach adopted by Wicklow County Council proposes an additional 14,476 units between 2025 and 2031 across the county.

Policy and Objective 2 of the Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028 states:

'It is a policy and objective of these Guidelines that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.'

The following table outlines the revised housing growth targets for County Wicklow, taking into account the additional provision of up to 50% over and above the housing growth requirement stated in the Government directive. This approach proposes an additional 17,908 houses delivered between 2025 and 2031 across the county.

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)
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2	Wicklow - Rathnew	3,170	502	639	0	2,029	41	59
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	Blessington	806	664	142	0	0	0	0
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	Enniskerry	418	113	17	129	159	4.5	13
	Kilcoole	878	173	57	0	648	18.5	31
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5	Ashford, Aughrim, Carnew, Dunlavin, Tinahely	489	117	191	0	181	7	32
6	Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh	206	63	23	0	120	5	14
	Total	17,908	2,768	2,819	267	12,054	234	401

Figure 9.0 Extract of proposed Core Strategy outlining future housing growth targets for County Wicklow 2025-2031 and zoned land provisions, excluding the 50% additional provision.

Within Wicklow Town and Rathnew, there is a target of 3,170 houses between 2025 and 2031. The subject lands to the West of the R750, Dunbur Lower, Wicklow, Co. Wicklow, will assist with achieving this goal, providing lands that are shovel-ready and are poised to deliver housing quickly and efficiently due to the strategic location of the site.

The Proposed Variation confirms Wicklow–Rathnew as a Key Town in line with the RSES and assigns it a significant housing growth trajectory, explicitly stating that Wicklow–Rathnew has the capacity to achieve and slightly exceed 50% growth in the short–medium term, supported by enhanced rail services to Wicklow Town.

In a Key Town context, the Core Strategy must provide a robust and resilient pipeline of deliverable residential land, with sufficient flexibility to withstand site-by-site slippage and non-activation. A strategy that relies primarily on a narrow set of assumptions about the timing and delivery of existing zoned lands does not provide the level of certainty required to meet the scale of growth assigned to Wicklow–Rathnew.

The Proposed Variation explicitly states that, even taking account of units under construction, extant permissions and the capacity of zoned serviced/serviceable lands, the plan provides capacity for approximately 21,500–25,500 units, and that “*this quantum of zoned land would not be sufficient to meet the longer term housing target requirements up to 2040*”.

This is a material admission within the Core Strategy evidence base that the proposed variation zoning framework is not future-proofed against the long-term housing requirement. In this context, it is reasonable and plan-led to address part of that deficit now, particularly by zoning lands that are already serviced and capable of early delivery.

Table 3.5 identifies 59 hectares of “zoned and serviced” land for Wicklow–Rathnew up to 2031, against a requirement of 41 hectares to meet growth to 2031.

However, the Core Strategy’s “serviced” metric is limited in scope: the document clarifies that serviced lands refers only to water services capacity (water supply and wastewater disposal) and that these estimates are not necessarily indicative of total available capacity or delivery certainty.

Accordingly, the “surplus” is not proof that sufficient, deliverable sites will come forward in the required timeframe. It is an aggregate estimate across multiple parcels with varying ownership, phasing, and activation risk. The Core Strategy also confirms that delivery and growth rates can be constrained by infrastructure, including wastewater capacity.

Furthermore, the need for sequential development means that much of the existing zoned land cannot be used to deliver housing unless substantial banks of land are developed first. Whereas the subject site is next in line for development, thus complying with the requirement for compact growth and sequential development.

Given these acknowledged constraints, a prudent Core Strategy approach—particularly in a Key Town—should include additional low-risk, serviced lands to ensure delivery certainty.

The subject lands comprise c. 12.1 hectares, are located on the southern edge of Wicklow Town, and are positioned as a sequential extension of the settlement. While adjoining lands are currently agricultural, the site relates to established residential development in the wider area (including Dunbur Lower) and is in proximity to the R750 corridor. The site is accessible to services and has demonstrable public transport connectivity, including bus services within approximately 2.1 km, rail access via Wicklow Station, and strategic access to the M11 (c. 5 km).

Critically, the subject lands are serviced, meaning they align with the most policy-preferred category of land under the tiered approach to zoning, namely lands capable of development without reliance on uncertain future infrastructure. This makes the site a strong candidate for inclusion in the Core Strategy's deliverable land supply. As shown in Figure x.0,

4.1 Alignment with Compact Growth Objectives (NPO 7 & 8)

The NPF prioritises sustainable urban development within existing built-up areas. As stated in **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.”

Our lands are contiguous to the built-up area of Wicklow and therefore well-positioned to deliver compact and sequential development. Wicklow is a rapidly growing town in Leinster. The lands to the north of the subject site are zoned residential and have established residential development. As such, the subject lands are next in line for development and will support densification rather than sprawl, a core principle of the NPF as well as **sequential development**. It is submitted that the lands should be rezoned to **RN1 – New Residential**.

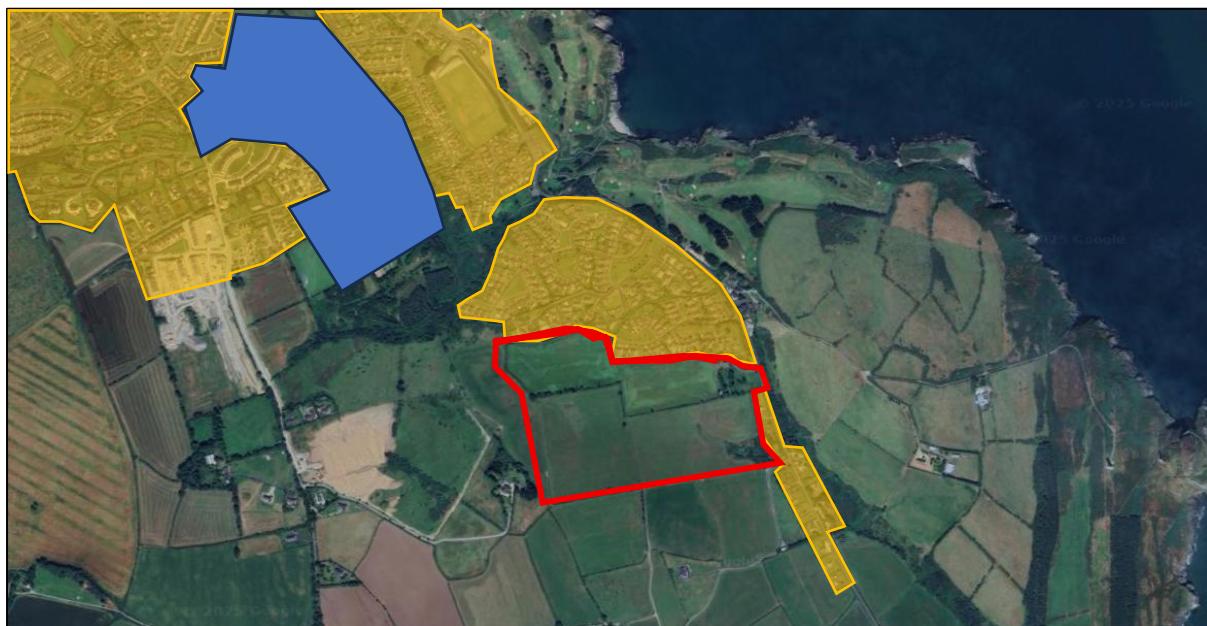


Figure 10.0 Aerial view of the subject site (red outline) showing existing residential development on its doorstep highlighted in orange and lands zoned for community and education in blue

4.2 Strategic Location within the Eastern & Midland Region

The NPF highlights the need for **balanced growth**, noting that “*Census 2022 and other indicators highlight significant unmet demand for housing in Dublin and the Mid-Eastern Region in particular...*”

As noted in the NPF, the census recorded a national population of 5.1 million people. This has resulted in the ESRI revising its future population projection as follows:

- **By 2030:** Population expected to reach **5.7 million**.
- **By 2040:** Population expected to reach **6.1 million**.
- A **high migration scenario** could push this to **6.3 million**.

Given the subject sites location within the county and its proximity to Wicklow town and Dublin, and national transport links, it represents an optimal location to accommodate such targeted growth sustainably and efficiently. The county has been identified as one of the fastest-growing population centres in the country; therefore, it is imperative that further lands are appropriately zoned to future-proof the delivery of housing within this area. The subject lands are immediately adjacent to the development boundary and existing residential uses and currently support a use which is not suited to a growing urban area.

Furthermore, it is important to strike a balance among the towns located on the county's east coast. Bray is the county's largest town and is limited by its proximity to the Dublin border. Wicklow town on the other hand has ample space to grow and develop while being connected to nearby towns and Dublin.

4.3 Responding to Urgent Housing Needs and Policy Direction

The NPF notes that as per ESRI projections, Ireland must deliver approximately **50,000 new homes per annum by 2040**. This demand is acute in areas experiencing strong economic and population growth. The rezoning of well-located lands such as ours is essential to meet the goals of the NPF, which states that there is a need to “*enable significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties.*”

Policy and Objective 2 states the following:

It is a policy and objective of these Guidelines that ‘additional provision’ of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework – First Revision (2025), relevant Ministerial Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended), relevant Government policy, and the undertaking of necessary environmental assessments.

As noted, the subject lands are serviced, located near public transport, **shovel-ready and are poised to deliver housing quickly and efficiently** due to the strategic location of the site.

Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	2025 to 2034	2035 to 2040
			New Annual New Housing Growth Requirement to 2034	New Annual New Housing Growth Requirement 2035 to 2040
Carlow County Council	406	518	518	507
Cavan County Council	479	666	666	599
Clare County Council	550	960	985	687
Cork City Council	2,032	2,706	2,706	2,539
Cork County Council	2,437	3,769	3,837	3,045
Donegal County Council	965	1,280	1,283	1,206
Dublin City Council	4,861	8,196	8,196	6,075
Dun Laoghaire Rathdown	1,908	3,085	3,585	2,384
Fingal County Council	1,717	2,738	3,153	2,146
Galway City Council	754	739	790	942
Galway County Council	1,831	1,790	2,008	2,288
Kerry County Council	690	1,167	1,167	862
Kildare County Council	1,535	1,524	2,755	1,918
Kilkenny County Council	618	775	948	772
Laois County Council	468	666	1,244	585
Leitrim County Council	124	201	201	155
Limerick City & County Council	2,193	2,599	2,599	2,740
Longford County Council	333	428	428	416
Louth County Council	956	1,380	1,677	1,195
Mayo County Council	501	542	1,111	626
Meath County Council	1,090	2,826	2,942	1,362
Monaghan County Council	306	330	751	382
Offaly County Council	439	663	891	549
Roscommon County Council	285	392	392	356
Sligo County Council	468	672	672	585
South Dublin County Council	1,932	2,596	3,270	2,414
Tipperary County Council	605	1,008	1,008	756
Waterford City & County Council	705	804	1,144	881
Westmeath County Council	548	983	983	685
Wexford County Council	578	1,072	1,622	722
Wicklow County Council	745	1,411	2,068	931
Total	33,059	48,484	55,598	41,312

Figure 11.0 Appendix 1 from the guidelines, which provides revised housing targets based on recent census data

4.4 Wicklow County Development Plan 2022-2028

The Wicklow County Development Plan 2022/2028 shows the settlement boundary for Wicklow. Residential development proposed for a location should be prioritised within the defined settlement boundary and should be in proportion to the pattern and grain of the existing development. The subject site is located directly adjacent to the settlement boundary for Wicklow and therefore makes an ideal candidate for rezoning to residential. The current Rural zoning objective is completely unsuited to an urban area and could lead to unsuitable development, which could prevent the future delivery of housing on the lands.

It is noted that the subject lands were previously zoned residential in the Wicklow Town Development Plan 2008-2014, and Strategic Land Bank in the Wicklow Town Development Plan 2013-2019. The lands were de-zoned in the most recent iteration of the development plan. Having regard to the subject lands' previous designation for residential development and later identification as a Strategic Land Bank, it is clear that the Planning Authority has long recognised the suitability of the lands for urban development. The revised housing growth requirements and acknowledged long-term land supply deficit now provide the policy justification to activate these lands. Rezoning the subject site would

therefore represent a logical, plan-led progression of established policy, rather than the introduction of new or speculative development land.

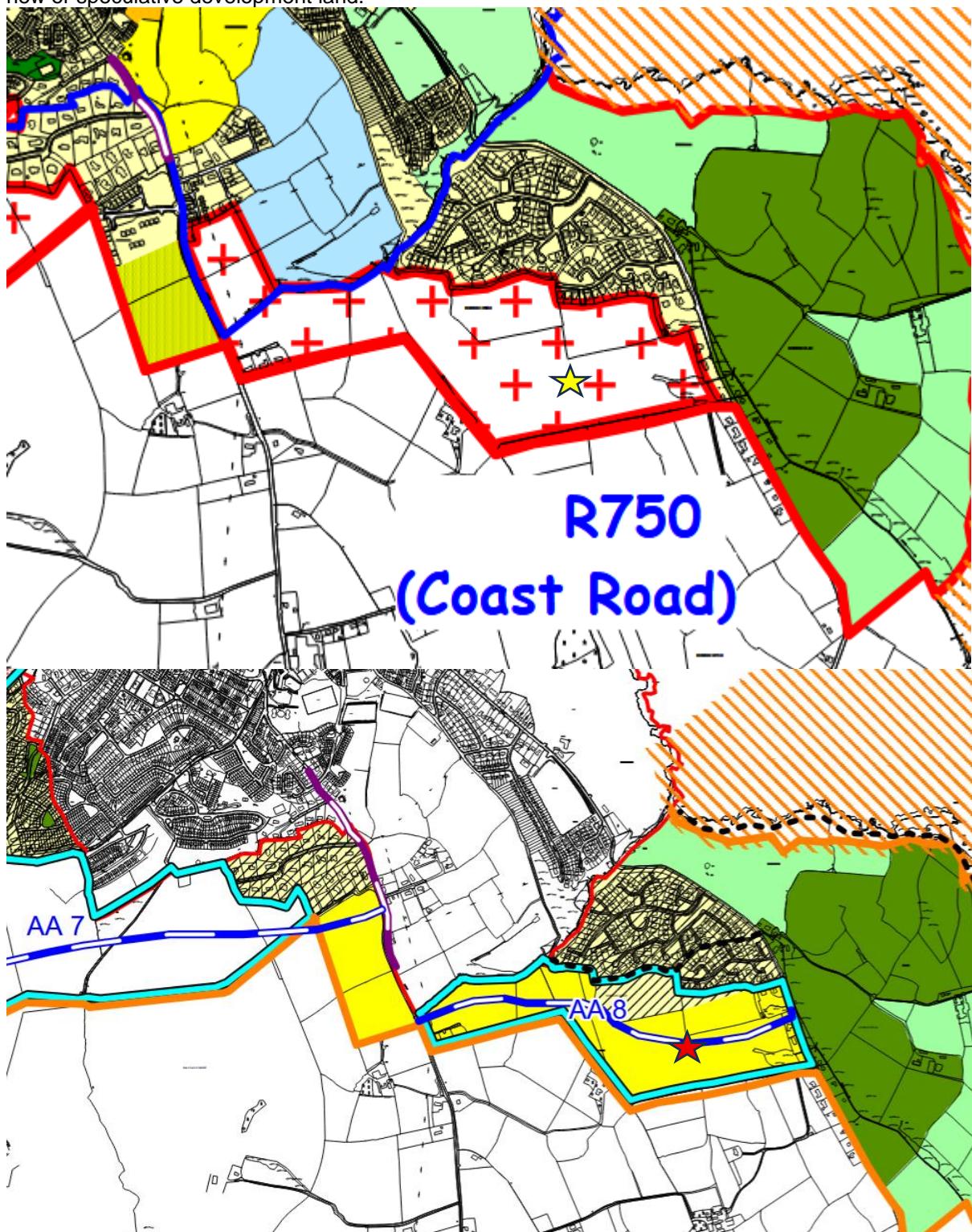


Figure 12.0 The subject lands were previously zoned residential in the Wicklow Town Development Plan 2008-2014 (bottom), and Strategic Land Bank (Top) in the Wicklow Town Development Plan 2013-2019

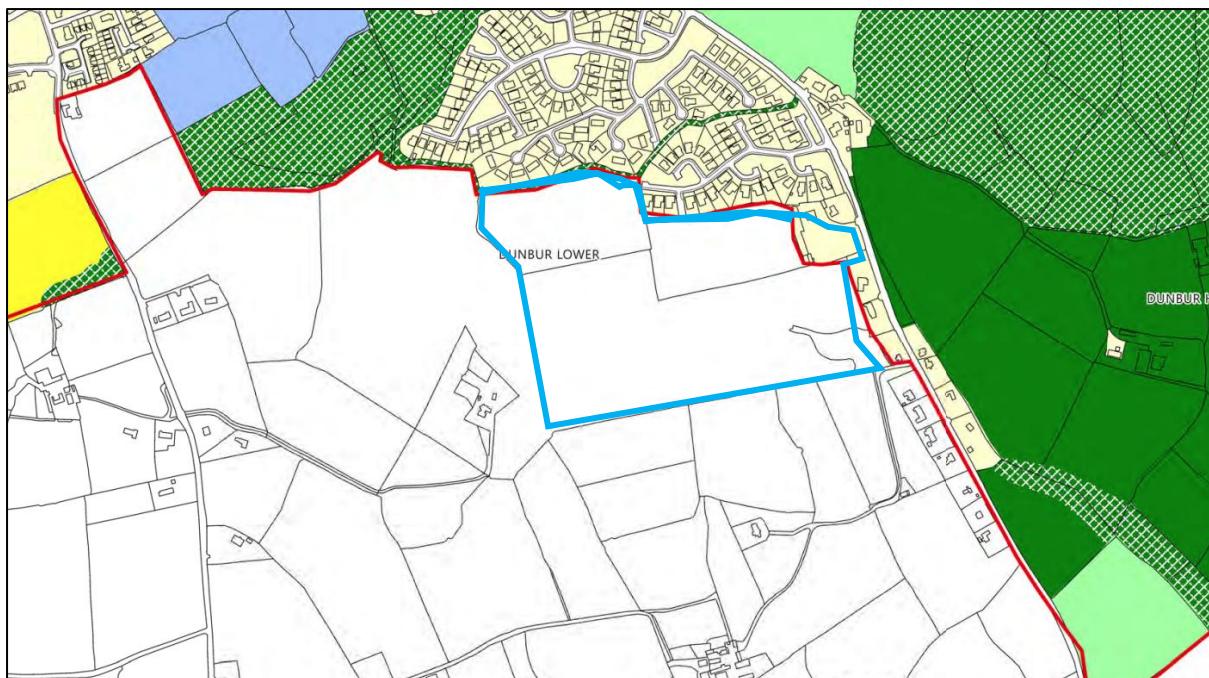


Figure 13.0 Extract from the Wicklow Town-Rathnew Local Area Plan 2025 Map No. 1 Land Use Zoning Objective, showing the settlement boundary (red line) and the subject site (blue line).

4.5 Public Transport Accessibility & TOD Potential (NPO 10)

The NPF promotes **Transport-Oriented Development** near high-capacity transport corridors. NPO 10 states:

NPO 10 *Deliver Transport Oriented Development at scale at suitable locations, served by high-capacity public transport... and ensure compact and sequential patterns of growth.*

Wicklow benefits from proximity to current and planned public transport. The subject site is ideally located to contribute to this form of sustainable, transit-linked development.

With respect to public transport, the lands are located c. 2.1 km from the nearest bus stop, which is served by the 131 route between Bray and Wicklow, the 133 route between Dublin (Busáras) and Wicklow, the 740A route between Dublin Airport and Gorey, and the UM11 between Maynooth and Gorey. The subject site is also located a c. 9 minute drive from the Wicklow Train Station, which is served by the InterCity Train between Dublin and Rosslare Europort. It is noted that the electrification of the railway line between Wicklow and Greystones is currently underway as part of the DART+ programme. This programme seeks to provide DART services to Wicklow as soon as 2028, thus greatly improving access to the town.

Additionally, the M11 motorway is located c. 5km (c. 11 minute drive) from the subject site, which provides direct access to Dublin to the north and Waterford to the south.



Figure 14.0 Aerial image of the subject lands, showing bus stops in the area and inset image showing the entrance to the site with existing footpath

4.6 Infrastructure Capacity and Readiness

The NPF prioritises locations where infrastructure is available or deliverable. The subject site is served by essential infrastructure (road, water, power, schools) or can be serviced readily, making it capable of early delivery in line with the Framework's goal to: *"Enable growth where it is required... prioritising development where there is existing/planned infrastructure capacity..."*

As shown in the images below, Uisce Éireann services are located adjacent to the site boundaries, thus providing immediate access to their network. The Applicant has engaged with Uisce Éireann and a confirmation of feasibility for the site. This confirms that the subject lands can facilitate residential development in the short term due to the adequate water, drainage and waste water networks in the immediate area.

As noted, the subject lands are **shovel-ready** and are poised to deliver housing quickly and efficiently due to the strategic location of the site.

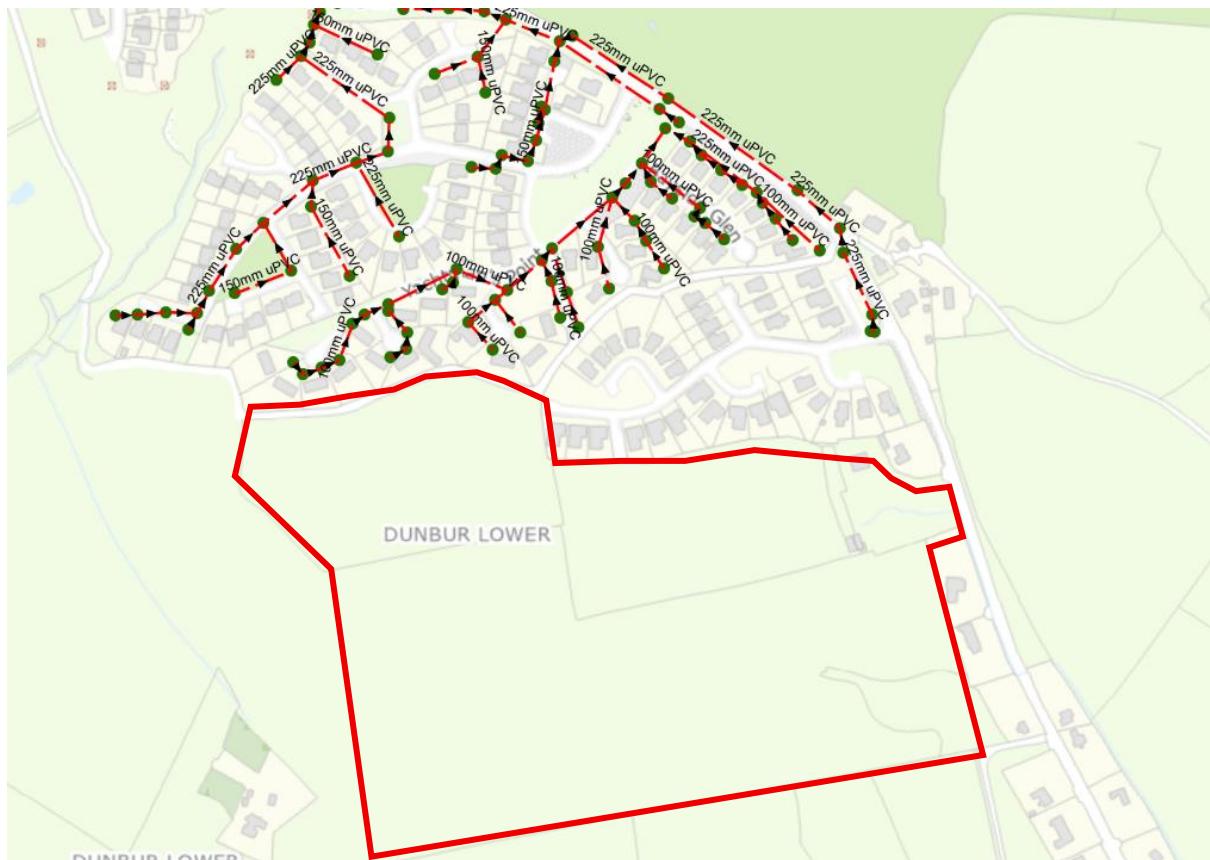


Figure 15.0 Existing sewerage lines located near the subject lands



Figure 16.0 Existing water pipes located near the subject lands

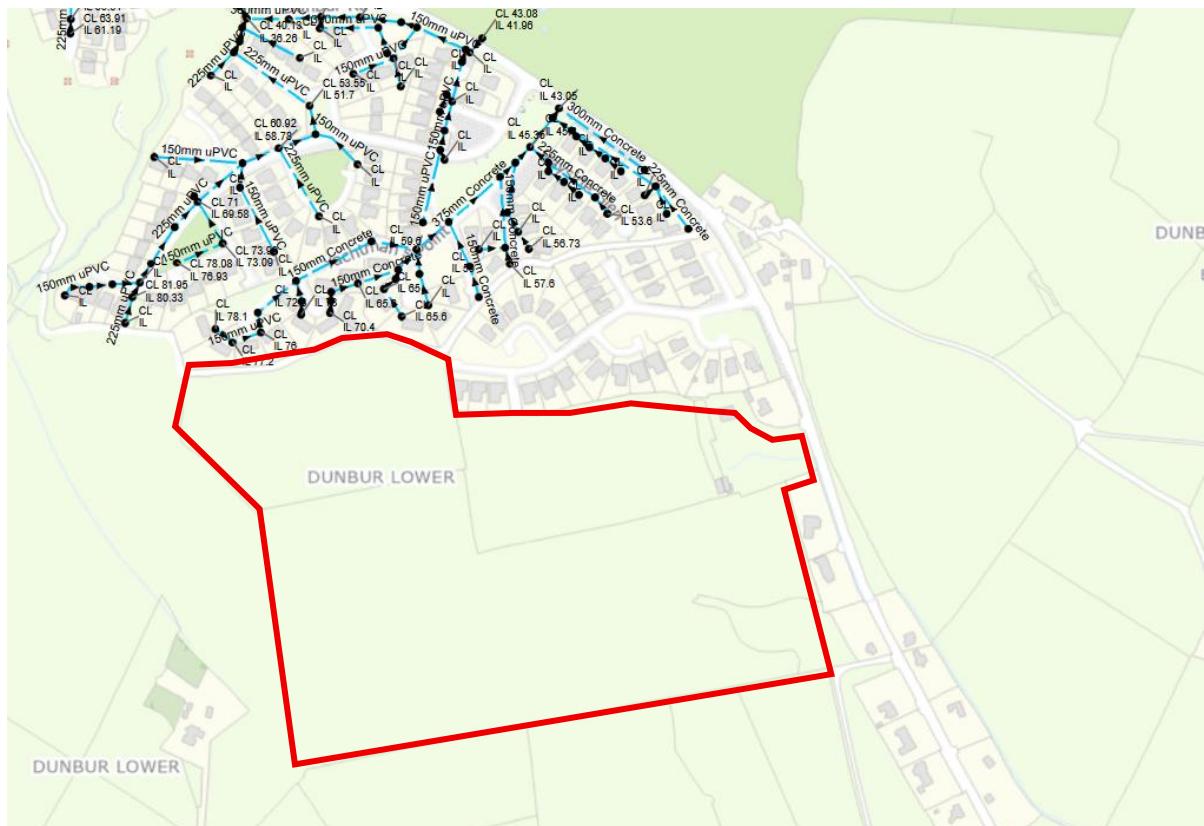


Figure 17.0 Existing surface water drainage network near the subject lands

4.7 Contribution to National Strategic Outcomes

The NPF contains 10 no. National Strategic Outcomes (NSO). The rezoning and development of the subject site would support multiple National Strategic Outcomes, including:

- Compact Growth (NSO 1)
- Sustainable Mobility (NSO 5)
- Access to Quality Services (NSO 10)

Rezoning will help deliver on these cross-cutting goals by providing space for housing in an integrated, sustainable, and well-serviced location.

We respectfully request the Planning Authority to strongly consider the rezoning of the subject site as it is a practical and necessary step toward implementing the NPF's vision for sustainable urban growth and to facilitate the revised population projections. The site presents a timely opportunity to contribute to the Government's top priority: accelerating housing delivery in strategically suitable locations.

The Proposed Variation includes Core Strategy Objectives committing the Council to support the delivery of housing on zoned lands and to proactively engage to remove impediments and to progress service-related issues.

Rezoning the subject lands is consistent with this delivery-led approach because it provides an additional serviced and sequential land option capable of contributing to housing output in the short–medium term, thereby reducing reliance on delayed or constrained sites and strengthening the robustness of the settlement strategy.

It is submitted that the Proposed Variation Core Strategy relies on an aggregate capacity position that does not provide sufficient assurance of delivery in a Key Town context, particularly given the Plan's own acknowledgment that zoned land quantum is inadequate to meet longer-term targets to 2040.

Accordingly, and having regard to the serviced status, sequential location and accessibility of the subject lands, it is submitted that the Proposed Variation should be amended to zone the subject 12.1 hectares for residential use (or an appropriate residential/mixed-use zoning). This would strengthen the Core Strategy by improving deliverability, increasing choice in the land market, and supporting the timely achievement of housing growth requirements in Wicklow–Rathnew.

5.0 Applicant Background

Crowley Residential is an established residential development company with a proven track record in the delivery of high-quality housing schemes across Ireland. The company specialises in the progression of residential sites from zoning and planning through to construction and occupation, with a particular focus on timely delivery and compliance with national and local planning policy. Crowley Residential has active residential development sites across Wicklow and Dublin with a combined investment in 2025 of €45.5 million.

Crowley Residential has the technical, financial, and organisational capacity to advance the subject lands efficiently, including experience in site masterplanning, infrastructure coordination, and engagement with statutory bodies. The company has successfully delivered residential developments of comparable scale and complexity and has demonstrated an ability to bring serviced and sequential sites into active use within short timeframes.

In the event that the subject lands are rezoned for residential use, Crowley Residential is well positioned to progress the site through the planning and development process without delay, thereby contributing meaningfully to the delivery of housing in Wicklow–Rathnew in accordance with the objectives of the County Development Plan and national housing policy.



Figure 18.0 Image of recently completed homes in Dalkey, Co. Dublin

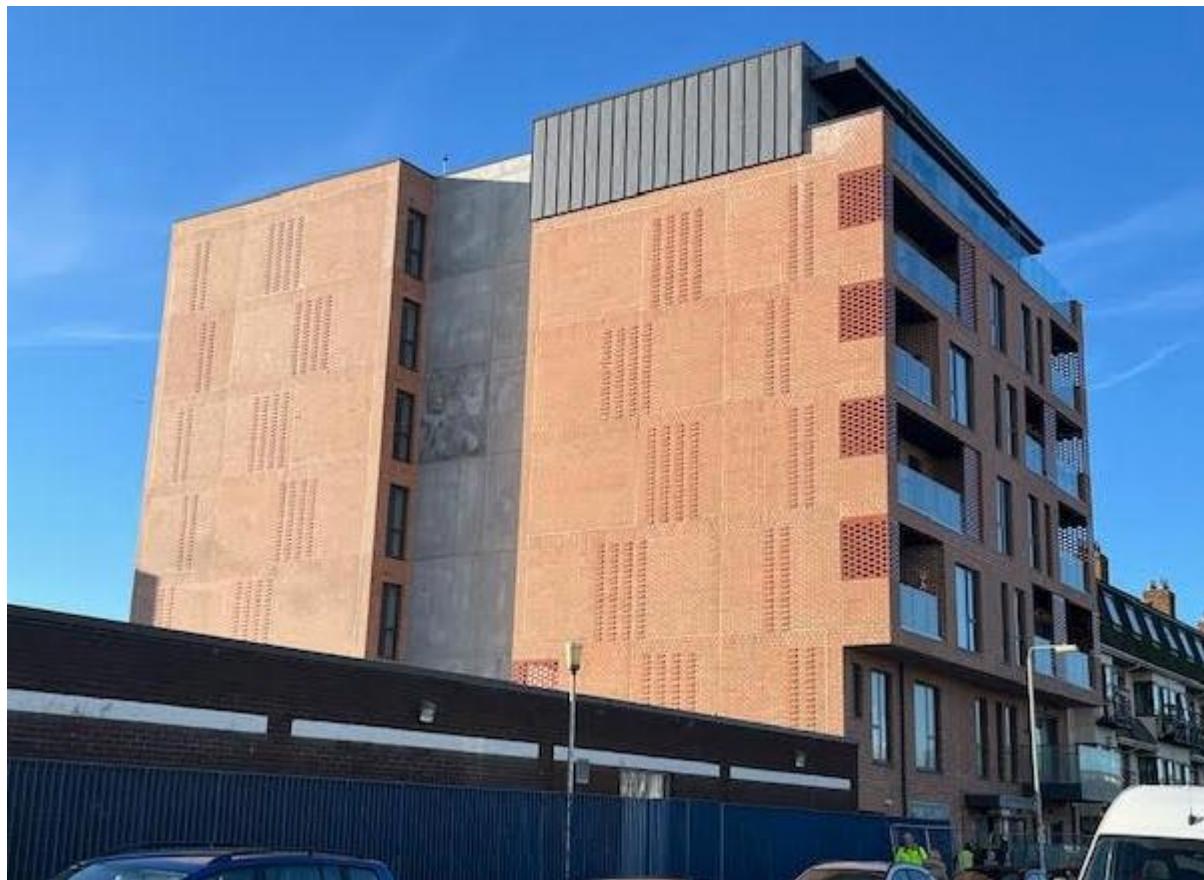


Figure 19.0 Image of recently completed homes in apartments in Dublin 4

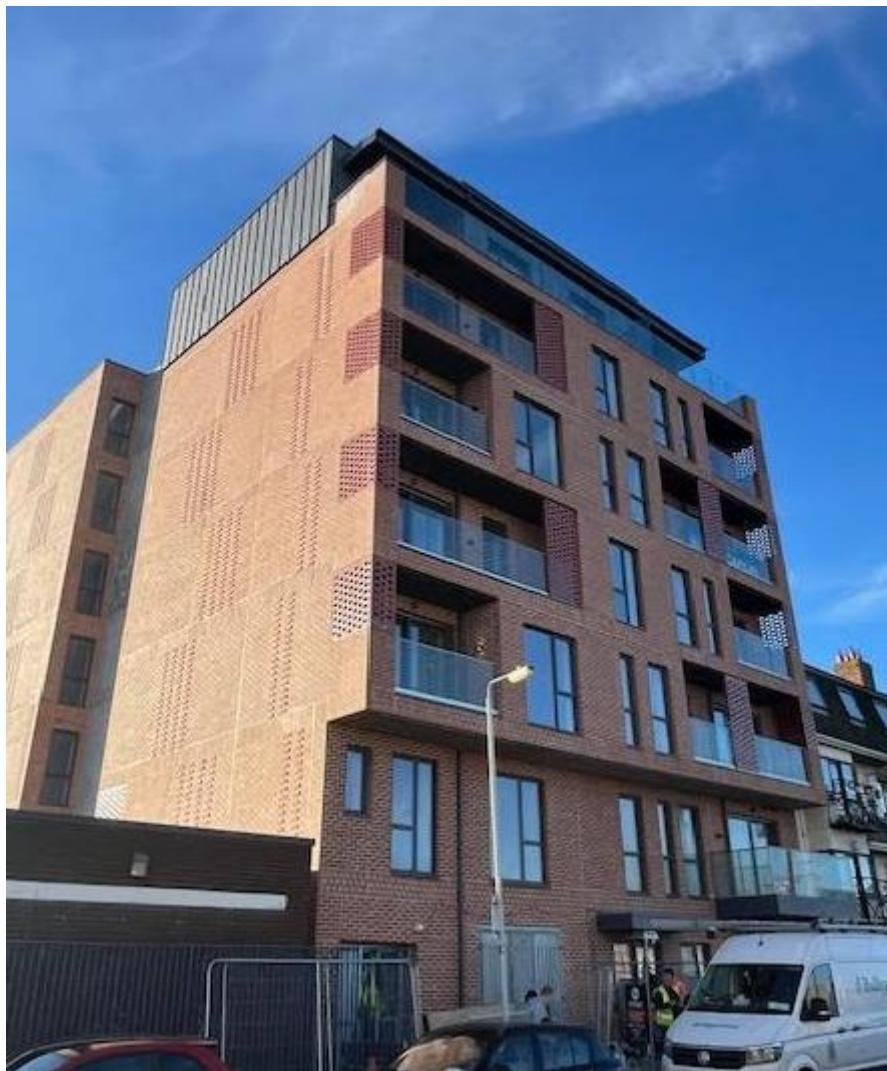


Figure 20.0 Image of recently completed apartments in Dublin 4

6.0 Conclusion

This submission has demonstrated that the lands to the west of the R750 at Dunbur Lower, Wicklow, Co. Wicklow represent a highly appropriate and deliverable candidate for residential rezoning as **RN1 – New Residential** in the context of the Proposed Variation to the Wicklow County Development Plan Core Strategy. While the Core Strategy identifies an aggregate quantum of zoned and serviced land within Wicklow–Rathnew, it is acknowledged within the Proposed Variation that this capacity is **insufficient to meet longer-term housing requirements to 2040** and that zoned capacity does not equate to guaranteed delivery.

The subject lands are strategically located on the southern edge of Wicklow Town, in a sequential relationship to existing residential development, and benefit from access to established and planned transport and service infrastructure, including regional bus services, rail connectivity at Wicklow Station, and proximity to the M11 corridor. Importantly, the lands are serviced and capable of early activation, thereby aligning with the tiered and sequential approach to zoning promoted by national and regional planning policy.

The Revised National Planning Framework (April 2025) establishes a clear imperative to accelerate housing delivery, requiring the unlocking of serviced and deliverable land to meet an annual national requirement of approximately 50,000 dwellings to 2040. The Framework emphasises compact growth (NPO 7), the prioritisation of serviced lands, and the integration of housing with sustainable transport infrastructure (NPO 10). In this regard, the continued exclusion of the subject lands from residential

zoning constrains the ability of the Core Strategy to respond effectively to revised housing growth targets in a designated Key Town.

The proposed rezoning of the subject lands would directly support the achievement of key National Strategic Outcomes, including:

- **NSO 1 – Compact Growth**, by facilitating the sequential expansion of Wicklow Town in proximity to existing residential development;
- **NSO 5 – Sustainable Mobility**, through access to established public transport services and strategic transport corridors; and
- **NSO 10 – Access to Quality Services**, given the availability of water, wastewater, electricity, education, transport and community infrastructure.

In summary, the rezoning of the lands to the west of the R750 at Dunbur Lower represents a plan-led, policy-consistent and low-risk response to the acknowledged limitations of the Proposed Variation Core Strategy. The site offers a realistic opportunity to strengthen housing delivery certainty in Wicklow–Rathnew by supplementing theoretical land capacity with a serviced, sequential and readily deliverable site.

Accordingly, it is respectfully requested that Wicklow County Council amend the Proposed Variation to include the subject lands within an appropriate **RN1 – New Residential** zoning objective, in order to ensure the Core Strategy is sufficiently robust to meet both medium- and long-term housing requirements in the interests of proper planning and sustainable development. These lands will also form part of a submission on the council's 'Call for Sites' which concludes in February 2026.



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