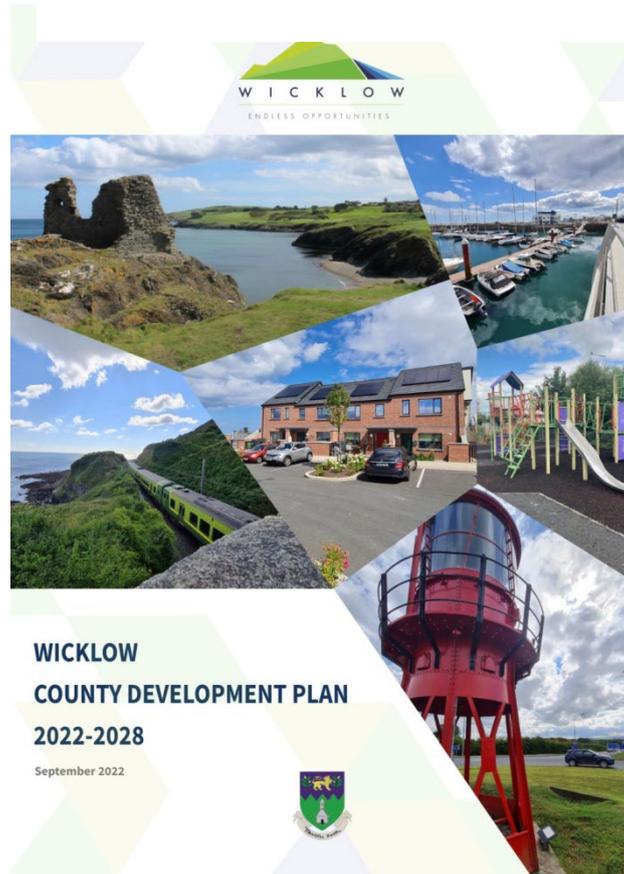




Comhairle Contae Chill Mhantáin  
Wicklow County Council



**Proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028**

**Report to the members of Wicklow County Council under Section 13(4) of the  
Planning and Development Act 2000 (as amended)**



**February 2026**

## Contents

		<b>page</b>
<b>Part 1</b>	<b>Introduction</b>	<b>2</b>
<b>Part 2</b>	<b>List of submissions</b>	<b>6</b>
<b>Part 3</b>	<b>Recommended Minor Modifications</b>	<b>9</b>
<b>Part 4</b>	<b>Consideration of submissions</b>	<b>13</b>
<b>4.1</b>	<b>Submissions from prescribed bodies and state/semi-state bodies.</b>	<b>13</b>
<b>4.2</b>	<b>Submissions from public representatives</b>	<b>48</b>
<b>4.3</b>	<b>Submissions from the public</b>	<b>59</b>
	Topic 1 Housing Targets & Settlement Strategy	59
	Topic 2 Density & Design	86
	Topic 3 Infrastructure	98
	Topic 4 Zoning	107
	Topic 5 'Other'	109
<b>4.4</b>	<b>Submissions on Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)</b>	<b>117</b>

## Part 1 Introduction

### 1.1 Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028

In accordance with Section 13(2) of the Planning and Development Act 2000 (as amended), Wicklow County Council is proposing a variation of the County Development Plan 2022.

Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of variations by planning authorities was commenced on 31 December 2025. However, section 69(2) provides that a variation of a development plan under Section 13 of the Act of 2000 shall continue under that Act after the repeal of Section 13 of the Act of 2000.

This Proposed Variation entails revisions to 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.

**REASON** for Proposed Variation No 6: 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).

This Proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow; in particular it does not relate to the potential zoning of new lands for residential development or the extension of settlement boundaries, but rather it relates primarily to revising the housing targets for various settlements / areas within County Wicklow as set out in the Wicklow Core Strategy. This was clearly set out in all documentation and publicity related to the Proposed Variation.

Wicklow County Council is separately running a '**Call For Sites**' consultation seeking expressions of interest from landowners for the future potential zoning of land for residential use and / or the extension of settlement boundaries.

### 1.2 Planning and Development Act 2000 (as amended)

Section 13(4)(a) of the Planning and Development Act 2000 (as amended) states that, not later than 8 weeks<sup>1</sup> after giving notice of a proposed variation to the development plan under subsection (2)(b), the Chief Executive of a planning authority shall prepare a report on any submissions or observations received under that subsection and shall submit the report to the members of the authority for their consideration.

This Chief Executive's Report has been prepared for consideration by the members of Wicklow County Council to fulfil this requirement under Section 13(4)(a).

The required content of this Chief Executive's Report is set out under Section 13(4) of the Planning and Development Act 2000 (as amended). A report under Section 13(4)(a) shall:

- (i) List the persons or bodies who made submissions or observations under this section,
- (ii) Provide a summary of -

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<sup>1</sup>Section 13 (10) of the Planning and Development Act 2000 (as amended) states, '*A person shall not question the validity of a variation in a development plan by reason only that the procedures as set out in this section were not completed within the time required.*'

- (I) the recommendations, submissions and observations made by the Minister, where the notice under paragraph (a) of subsection (2) was sent before the establishment of the Office of the Planning Regulator,
  - (II) the recommendations, submissions and observations made by the Office of the Planning Regulator, and
  - (III) the submissions and observations made by any other persons, in relation to the proposed variation.
- (iii) Give the response of the Chief Executive to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

As Wicklow County Council is within the Greater Dublin Area, a report under paragraph (a) shall summarise the issues raised and the recommendations made by the NTA in its written submission and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the proposed variation.

Furthermore, a report under paragraph (a) shall summarise the issues raised and recommendations made by the relevant regional assembly in its written submission and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

### 1.3 Draft Consultation Process

The Proposed Variation was placed on display during the period of 05 December 2025 to 16 January 2026. The aim of the consultation process was to enable the public and interested parties to give their observations on the Proposed Variation.

A total of **119** No. submissions were made on the Proposed Variation.

A small number of submissions made include a request for the zoning of particular lands (please see Part 4.3 of this report). The Proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow; in particular it does not relate to the potential zoning of new lands for residential development or the extension of settlement boundaries, but rather it relates primarily to revising the housing targets for various settlements / areas within County Wicklow as set out in the Wicklow Core Strategy.

Wicklow County Council is separately running a '**Call For Sites**' consultation seeking expressions of interest from landowners for the future potential zoning of land for residential use and / or the extension of settlement boundaries.

Any submitter making such a zoning request has been contacted directly and provided with information regarding the 'Call for Sites' process.

The written submissions on the Proposed Variation are held on file and are available for inspection on Wicklow County Council's website [here](#)

## 1.4 Consideration of Submissions

A full list of the submissions received, with hyperlinks to the submission on the website, is available to view in Part 2 of this report.

On foot of these submissions, the Chief Executive is recommending the making of **4 No. minor modifications** to the Proposed Variation. These recommendations are set out in Part 3 of this report. The CE is satisfied that said recommended modifications are minor, and are **not material**, and therefore would not require further stages of public consultation.

Each submission made has been summarised and assessed in Part 4 of this report.

Part 4 is broken into 4 No. sections –

Part 4.1 relates to submissions from prescribed bodies and state/semi-state bodies. This part is organised by submitter and addresses the issues in the order set out in the submission.

Part 4.2 relates to submissions from public representatives – Councillors / TDs / Senators. This part is organised by submitter and addresses the issues in the order set out in the submission.

Part 4.3 addresses submissions from the public; this part is organised by topic, rather than by submitter. The topic order is as follows:

Topic 1	Housing Targets & Settlement Strategy
Topic 2	Density & Design
Topic 3	Infrastructure
Topic 4	Zoning
Topic 5	'Other'

Part 4.4 deals with submissions on the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

This report is submitted to the Council Members for their consideration.

## 1.5 Next Steps – Variation Timetable

The members of the planning authority are required to consider the Proposed Variation and this Chief Executive's Report, including the CE's recommendation for 4 No. minor modifications.

If the planning authority, after considering a submission, observation or recommendation from the Minister, Office of the Planning Regulator or Regional Authority, decides not to comply with a recommendation made by such, it shall so inform the Minister, OPR or Regional Authority as relevant as soon as practicable by written notice and shall include the reasons for the decision.

The consideration of the Proposed Variation and the Chief Executive's Report shall be completed not later than 6 weeks after the submission of the Chief Executive's Report to the members of the planning authority. **This matter is scheduled for consideration at a special Council meeting on 30 March 2026.**

Having considered the Proposed Variation and Chief Executive's Report, the members of the planning authority may, by resolution, either:

- (i) make the variation with or without further modification,
- (ii) refuse to make the variation,

Where a further modification, if made, would constitute a 'material alteration' of the variation, the following shall be carried out:

- The planning authority shall determine if a strategic environmental assessment or an appropriate assessment or both, is required to be carried out as respects a proposed modification. Within 2 weeks of such a determination, the Chief Executive shall specify the period that is considered necessary to facilitate the carrying out of a SEA/AA.
- The planning authority shall publish notice of a proposed material alteration and any determination that requires the carrying out of an SEA/AA. The proposed material alteration and any determination shall be on public display for a period of not less than 4 weeks and submissions invited. All submissions shall be taken into account before the variation of the development plan is made.
- The SEA/AA shall be carried out within the period specified by the Chief Executive.
- A further modification\* can be made to the variation

\* A further modification to the variation may be made where it is 'minor' in nature and therefore not likely to have significant effects on the environment or adversely affect the integrity of a European site, and shall not be made where it refers to an increase in the area of land zoned for any purpose, or an addition to or a deletion from the record of protected structures.

Formally, making a variation is done by resolution of the Council.

In making a variation to a development plan, the members are restricted to considering the proper planning and sustainable development of the area, the statutory obligations of a local authority and any relevant policies or objectives of the Government or any Minister of the Government.

Where a planning authority makes a variation in a development plan, it shall publish a notice of the making of the variation in at least one newspaper circulating in its area. A variation made to a development plan shall have effect from the day that the variation is made.

## Part 2 List of submissions

Reference Number	Name & hyperlink	Portal Reference / By post/hand
1	<a href="#">Leonie Hogan</a>	VAR6-125811
2	<a href="#">Office of Public Works Flood Risk Management</a>	VAR6-143719
3	<a href="#">The Maritime Area Regulatory Authority</a>	VAR6-170057
4	<a href="#">Environmental Protection Agency</a>	VAR6-151242
5	<a href="#">Greenleaf Homes Limited</a>	VAR6-163023
6	<a href="#">Dominique McMullan</a>	VAR6-213632
7	<a href="#">Anne Marie Carew</a>	VAR6-221059
8	<a href="#">Aisling Woods</a>	VAR6-224345
9	<a href="#">Catherine Nolan</a>	VAR6-003518
10	<a href="#">Annika Schmaedeke</a>	VAR6-073709
11	<a href="#">Kismet Ltd</a>	VAR6-085249
12	<a href="#">Eileen and Roy Byrne</a>	VAR6-090700
13	<a href="#">Michael Blackbyrne</a>	VAR6-132550
14	<a href="#">Orla Swan</a>	VAR6-132010
15	<a href="#">Transport Infrastructure Ireland</a>	VAR6-150053
16	<a href="#">Ashford GAA Club</a>	VAR6-131142
17	<a href="#">Neassa Sugrue</a>	VAR6-164318
18	<a href="#">Alex Pigot</a>	VAR6-210855
19	<a href="#">Alex Pigot</a>	VAR6-211048
20	<a href="#">Caroline Leonard</a>	VAR6-101207
21	<a href="#">Catherine Nolan</a>	VAR6-144558.
22	<a href="#">Flavio Colombo</a>	VAR6-145605
23	<a href="#">Jude</a>	VAR6-115659
24	<a href="#">Michelle Cronin</a>	VAR6-144041
25	<a href="#">David Ballesty</a>	VAR6-195555
26	<a href="#">Friends of Knocksink Woods</a>	VAR6-104948
27	<a href="#">Derek Mitchell</a>	VAR6-165037
28	<a href="#">Tina Roche</a>	VAR6-191649
29	<a href="#">Brian Donnelly</a>	VAR6-101029
30	<a href="#">Nimol Holdings Ltd</a>	VAR6-112140
31	<a href="#">Lorna Kelly</a>	VAR6-121527
32	<a href="#">Clarke Family &amp; Ryecroft Ltd</a>	VAR6-115803
33	<a href="#">Helen Clarke and Family</a>	VAR6-120035
34	<a href="#">Gill Toal</a>	VAR6-135127
35	<a href="#">Department of Transport</a>	VAR6-141159
36	<a href="#">Jenny Derbyshire</a>	VAR6-144017
37	<a href="#">National Transport Authority</a>	VAR6-155852
38	<a href="#">Sally Phelan</a>	VAR6-172204
39	<a href="#">Catherine Nunes</a>	VAR6-180734
40	<a href="#">Caroline Leonard</a>	VAR6-184300
41	<a href="#">Rosemary Riordan</a>	VAR6-195357
42	<a href="#">Rosemary Riordan</a>	VAR6-200214
43	<a href="#">Paula Cantillon</a>	VAR6-200547
44	<a href="#">Thomas Riordan</a>	VAR6-202900
45	<a href="#">Edwina and Dale Allman</a>	VAR6-202330
46	<a href="#">James Barry</a>	VAR6-212348

47	<a href="#">Janet Sheehy</a>	VAR6-215617
48	<a href="#">Marie Farron</a>	VAR6-083049
49	<a href="#">Enniskerry GAA Club</a>	VAR6-112200
50	<a href="#">John Henry Prosser</a>	VAR6-114719
51	<a href="#">Wicklow Planning Alliance</a>	VAR6-113827
52	<a href="#">Malachy Quinn</a>	VAR6-122802
53	<a href="#">Robert Neill</a>	VAR6-123514
54	<a href="#">Joanne Coogan</a>	VAR6-125420
55	<a href="#">Patricia Walker</a>	VAR6-134424
56	<a href="#">Graham Kennedy</a>	VAR6-144648
57	<a href="#">Liam Burke</a>	VAR6-145134
58	<a href="#">Liam Burke</a>	VAR6-145529
59	<a href="#">Albert Smith</a>	VAR6-141418
60	<a href="#">Meath County Council</a>	VAR6-150844
61	<a href="#">Dr. Graham McMullin</a>	VAR6-152458
62	<a href="#">Caroline O'Callaghan</a>	VAR6-152717
63	<a href="#">Zandra McMullin</a>	VAR6-152816
64	<a href="#">Billy Timmins</a>	VAR6-151556
65	<a href="#">Niall Melvin</a>	VAR6-180734
66	<a href="#">Liz McMahon and Joe Wilson</a>	VAR6-191507
67	<a href="#">Dave Casey</a>	VAR6-205946
68	<a href="#">Richard Mayne</a>	VAR6-205905
69	<a href="#">The Alliance of Bray Residents</a>	VAR6-214712
70	<a href="#">Aidan Harmon</a>	VAR6-001221
71	<a href="#">Dwyer Nolan Developments Ltd</a>	VAR6-093748
72	<a href="#">Catherine O'Connor</a>	VAR6-093928
73	<a href="#">Silverbow Ltd</a>	VAR6-101501
74	<a href="#">Borg Developments and Cairn</a>	VAR6-101813
75	<a href="#">Leddy Family</a>	VAR6-104312
76	<a href="#">Kilian Mullet</a>	VAR6-104349
77	<a href="#">Ger Leonard</a>	VAR6-223352
78	<a href="#">Nigel Pepper</a>	VAR6-105359
79	<a href="#">Glenveagh Homes Ltd</a>	VAR6-114554
80	<a href="#">Sorcha O'Keeffe</a>	VAR6-122222
81	<a href="#">Carol Ann O'Keeffe</a>	VAR6-122543
82	<a href="#">Patricia O'Keeffe</a>	VAR6-122637
83	<a href="#">Cliona Loughnane</a>	VAR6-134506
84	<a href="#">Barbara Ogilvy Watson</a>	VAR6-134111
85	<a href="#">Greg Kavanagh</a>	VAR6-134732
86	<a href="#">Ardale Property Group</a>	VAR6-141318
87	<a href="#">Crowley Residential</a>	VAR6-141944
88	<a href="#">Ballymore Group</a>	VAR6-143014
89	<a href="#">Brien Vahey</a>	VAR6-141724
90	<a href="#">Glenturas Construction Ltd &amp; Clouddale Ltd</a>	VAR6-123738
91	<a href="#">Uisce Eireann</a>	VAR6-143839
92	<a href="#">Alan Richardson</a>	VAR6-144143
93	<a href="#">Patrick Casey</a>	VAR6-144435
94	<a href="#">BBA Architecture</a>	VAR6-143851
95	<a href="#">Brien Vahey</a>	VAR6-145404
96	<a href="#">Alan Richardson</a>	VAR6-144815

97	<a href="#">Electricity Supply Board</a>	VAR6-152751
98	<a href="#">David and Ida Kelly</a>	VAR6-153839
99	<a href="#">Dunmoy Properties Ltd</a>	VAR6-155604
100	<a href="#">Fassaroe Developments Ltd</a>	VAR6-155756
101	<a href="#">Brookhampton Ltd</a>	VAR6-141847
102	<a href="#">Maguire Family</a>	VAR6-141008
103	<a href="#">Seana Kevany</a>	VAR6-161335
104	<a href="#">Sarah Leckie</a>	VAR6-162623
105	<a href="#">D/RES Properties and The Evans Family</a>	VAR6-143940
106	<a href="#">Avonvard Ltd</a>	VAR6-163221
107	<a href="#">Board of Eagle Valley Consolidated Management</a>	VAR6-163016
108	<a href="#">Craig Bishop</a>	VAR6-163459
109	<a href="#">Cairn Homes</a>	VAR6-163607
110	<a href="#">Office of the Planning Regulator</a>	VAR6-164634
111	<a href="#">Georgina Young</a>	VAR6-164726
112	<a href="#">Shane Stokes</a>	VAR6-164728
113	<a href="#">Lee Mckeown</a>	VAR6-165202
114	<a href="#">Paul and Grace Kavanagh</a>	VAR6-164754
115	<a href="#">Rebecca Candon</a>	VAR6-174721
116	<a href="#">Alison Wildes</a>	VAR6-165220
117	<a href="#">Shane Stokes</a>	VAR6-165734
118	<a href="#">Fionntán Ó Súilleabháin TD</a>	VAR6-165622
119	<a href="#">Department of Education and Youth</a>	VAR6-160126

### Part 3 Chief Executive's Recommendations for Minor Modifications

To follow is a list of the Chief Executive's **Recommended Minor Modifications** to the Proposed Variation. New text is shown in *purple*, deleted text in *strikethrough*.

With respect to environmental matters:

1. The Recommended Minor Modifications to the Proposed Variation as set out in this document would further contribute towards provisions related to sectors and topics that are already provided for within the Proposed Variation and the existing County Development Plan. Taking into account the measures that have already been integrated into the Proposed Variation and the existing County Development Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, any potential effects arising from these minor modifications would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse). Taking this into account, these changes would not be likely to result in significant environmental effects and therefore further stages of SEA are not required.
2. There are no additional sources for effects on European sites arising from the Recommended Minor Modifications to the Proposed Variation as set out in this document that have not been considered by the AA stages to date. Taking into account the mitigation measures that have already been integrated into the Proposed Variation and the existing County Development Plan, these changes would not affect the integrity of any European site and therefore further stages of AA are not required.

## Recommendation 1

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### Add the following sentence beside Table 3.5

*The new housing target for 2025-2031 as provided for County Wicklow by the new Guidelines for the 2025-2031 period is 14,476 units (Table 3.1).*

*Table 3.5 shows the new targets for the Level 1-6 settlements in the County as 17,908 units. Therefore the new target 2025-2031 exceeds the Guidelines by c. 25%.*

## Recommendation 2

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### Amend Table 3.5 as follows:

Table 3.5, add the following footnote to Column 8

*'This is the net amount of land required to accommodate the target number of residential units'*

Table 3.5, add the following footnote to Column 9

*'This is the net amount of zoned land available for residential development'; lands required for major road/streets, for commercial development (inc. retail, leisure and entertainment), for primary schools, churches and other community services and facilities, for larger, regional or district parks, wayleaves or rights of way and other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding have not been included in this figure'*

**Recommendation 3**

**Amend Proposed Table 6.1 (Areas and Density Ranges) as follows:** (dph = dwellings per hectare)

Areas	Level in WCDP hierarchy	Density Ranges (net)	Applicable to
<b>Metropolitan Towns (&gt;1,500 population) Centre and Urban Neighbourhoods</b>	<b>1</b> <b>3</b>	50 dph - 150 dph	<b>Bray</b> <b>Greystones-Delgany</b>
<b>Metropolitan Towns (&gt;1,500 population) Suburban / Urban Extension</b>		35 dph - 50 dph Up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations.	
<b>Metropolitan Area – Village (&lt;1,500 population)</b>	<b>6</b>	Density should be tailored to reflect existing density and / or built form but should not generally fall below 25 dph.	<b>Kilmacanogue</b>
<b>Key Town / Large Town (5,000+) Centre &amp; Urban Neighbourhood</b>	<b>2</b> <b>3</b>	40 dph-100 dph	<b>Wicklow – Rathnew</b> <b>Arklow</b> <b>Blessington</b> <i>Baltinglass Enniskerry</i> <i>Kilcoole</i> <i>Newtownmountkennedy</i> <i>Rathdrum</i>
<b>Key Town / Large Town (5,000+) Suburban/Urban Extension</b>		30 dph to 50 dph Up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations	
<b>Small / Medium Town (1,500-5,000) Centre</b>	<b>4</b>	The scale of new development in the central areas of small to medium sized towns should respond positively to the scale, form and character of existing development, and to the capacity of services and infrastructure (including public transport and water services infrastructure)	<b>Baltinglass</b> <b>Enniskerry</b> <b>Kilcoole</b> <b>Newtownmountkennedy</b> <b>Rathdrum</b> <i>Ashford</i> <i>Aughrim</i> <i>Carnew</i> <i>Dunlavin</i> <i>Tinahely</i> <i>Avoca</i> <i>Donard</i> <i>Newcastle</i> <i>Roundwood</i> <i>Shillelagh</i>
<b>Small / Medium Town (1,500-5,000) Edge</b>		25 dph - 40 dph	
<b>Rural Town or Village (&lt;1,500)</b>	<b>5 - 9</b>	Development in rural towns and villages is tailored to the scale, form and character of the settlement and the capacity of services and infrastructure (including public transport and water services infrastructure). The density of development at such locations should respond in a positive way to the established context	<b>Ashford</b> <b>Aughrim</b> <b>Carnew</b> <b>Dunlavin</b> <b>Tinahely</b> <b>Avoca</b> <b>Donard</b> <b>Newcastle</b> <b>Roundwood</b> <b>Shillelagh</b> Level 7-9

**Source:** 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (DoHLGH 2024)  
Wicklow County Development Plan 2022-2028: Settlement Hierarchy

## Recommendation 4

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### Amend Chapter 6, Section 6.1 as follows:

The NPF warns against the intensification of social housing in areas that are already dense with social housing and advocates for the development of diverse neighbourhoods with a balance of public and private housing to create healthy communities. The NPF states that in addition to the significant investment in social housing we also need to ensure that more affordable homes. ~~are built for sale or rent, particularly in our cities, towns and villages, enabling people to choose to live within their communities and closer to where they work.~~ **are provided in our urban areas as part of the creation of mixed-tenure communities.** It indicates that this will be facilitated through more proactive land management and coordinated and efficient provision of enabling infrastructure, particularly on ~~publicly local authority and State-~~owned lands, as well as providing flexibility on design and density, particularly in our urban cores, to enable more cost-efficient construction and provide a variety of homes aimed at first-time buyers.

**Part 4 Consideration of submissions**

**4.1 Prescribed Bodies**

No.	Name	Link to submission
110	Office of the Planning Regulator	<a href="#">Office of the Planning Regulator</a>

Issues Raised
<p>Wicklow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.</p> <p>Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.</p> <p>Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.</p> <p>A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.</p> <p>On adoption of the Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.</p>
Opinion of the Chief Executive
Noted
Chief Executive's Recommendation
No change required to Proposed Variation

Issues Raised
<p>The Proposed Variation includes a change to the County Development Plan with regard to the implementation of the NPF Implementation: <i>Housing Growth Requirements (2025)</i> (Housing Growth Guidelines), <i>Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)</i> (Compact Settlements Guidelines) and <i>Planning Design Standards for Apartments, Guidelines for Planning Authorities (2025)</i> including changes to:</p> <ul style="list-style-type: none"> <li>the core strategy;</li> <li>policy amendments; and</li> <li>density ranges.</li> </ul> <p>Specifically, Core Strategy Objective 1 of the proposed Variation provides that both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of the County Development Plan. The Office supports the change to the zoning status of these lands in providing additional zoned land in key areas that can be brought forward for housing delivery in the short term.</p> <p>The Office notes, however, that although the Planning Authority has commenced a non-statutory 'Call for Sites', no new residential zoning has been brought forward as part of the proposed Variation on the basis that that sufficient land has already been zoned consistent with the requirement of the Housing Growth Guidelines.</p>

However, having examined this approach in detail, the Office is concerned that it may be overly cautious in the Dublin Metropolitan Area. This is particularly relevant given the reliance on the full development of lands already zoned at Fassaroe and the realistic lead times required for planning, coordination and delivery of the necessary infrastructure to support the development of these lands. Furthermore, the Office estimates that the gross-to-net density assumptions used to estimate the requirement for residential zoned land are conservative and may underestimated the actual needs.

In light of these issues, the Office considers that the Proposed Variation adopts an overly cautious approach by not bringing forward additional lands beyond the Phase 2 lands at locations within the Dublin Metropolitan Area that are accessible to existing or planned high-quality public transport. On this basis, the Office recommends that identifying additional zoned lands would be advisable to provide contingency for the short to medium term.

In this context, the submission sets out recommendations in relation to:

- the process used to estimate the potential housing numbers that can be achieved on the zoned lands;
- the critical role of residential zoned lands at Fassaroe in meeting the housing growth requirement, and the need for a collaborative strategy with key stakeholders that can unlock infrastructure constraints and accelerate the development of the lands; and
- the opportunity to identify long term strategic and sustainable development sites / opportunity areas, particularly within the Dublin Metropolitan Area to align with long lead-in timeframes for infrastructure delivery, giving clear strategic direction of future development locations.

#### Opinion of the Chief Executive

See detailed assessment in the section to follow

#### Chief Executive's Recommendation

See below

#### Issues Raised

##### Implementation of the housing growth requirements

As stated above, the Office welcomes the proposed inclusion of Core Strategy Objective 1 of the Proposed Variation which states that both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of the County Development Plan. The Office recommends, however, that the Planning Authority provides absolute clarity that Phase 2 / Priority 2 lands now have a same status as Phase 1 lands, and are available for immediate development subject to the regular requirements of the development management process.

The Office also welcomes the inclusion of a revised core strategy table (table 3.5) which details the new housing growth requirements for each area within the county and the units under construction as of Q3 2025, units yet to be commenced and units permitted but subject to appeal / JR. However, the Office considers that providing additional information below would provide greater clarity and certainty. Such information should include the baseline housing growth requirement for the county to 2031 (in accordance with appendix 1 of the Housing Growth Guidelines, of 14,476 units) and the amount of zoned and serviced land available in each settlement to meet this requirement, followed by lands with units under construction and yet to be commenced in each settlement, and the additional provision of zoned and serviced land available.

Table 3.4 and table 3.5 of the Proposed Variation indicate that the quantum of zoned and serviceable land is sufficient to meet the housing growth requirement of 14,476 units to 2031, with capacity for 50 per cent additional provision. This table clearly sets out the net densities used in this process and how they align with

the recommended ranges in the Compact Settlements Guidelines. However, the gross-to-net density assumptions used to determine the site area to which these densities can be applied (i.e. excluding roads, open spaces, landscaping etc) is not specified.

According to the Compact Settlements Guidelines, the net site area typically represents approximately 65–80 per cent of the gross area, though this varies by site and local context. Based on the information available, the Office estimates that achieving the housing growth requirement and allowing for additional provision would require net site areas at the upper end of this range across all sites.

The Office therefore recommends that the Planning Authority review the assumptions being relied upon as above and, where such assumptions may not be fully justified based on the area of land involved and local circumstances, consider the need for additional lands for housing delivery.

With regard to lands zoned for Residential-High Density at Fassaroe, which account for approximately 80 per cent of zoned and serviced lands available for development in Bray, the Office recognises that the Bray and Environs Transport Study (2019) (BETS), prepared by the Planning Authority, National Transport Authority (NTA) and Transport Infrastructure Ireland (TII), sets out requirements under table 3.1 for Fassaroe Phase 1 which would comprise approximately 650 units. However, for further phases of development at Fassaroe, the BETS proposes a separate implementation and monitoring plan for development by the Planning Authority with NTA and TII input.

Progressing the above is a key step that can and should be advanced at the earliest opportunity to enable the development of the Fassaroe lands which, together with the neighbouring area of Old Connaught in Dún Laoghaire-Rathdown, comprise a strategic land bank with the capacity to deliver housing at scale in the Dublin Metropolitan Area.

While there may be areas of the landbank that are less reliant on infrastructure delivery, the Office is of the view that a targeted, proactive, and cross-departmental approach will be essential to ensure accelerated and coordinated delivery of the wider landbank, and recommends that the Planning Authority works with Dún Laoghaire-Rathdown County Council, relevant infrastructure agencies such as TII and the NTA, and relevant development sector interests with the capability to progress housing delivery in the short to medium term to establish and implement an Infrastructure Planning and Delivery Strategy in accordance with RPO 4.40 of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly.

This approach would align the planning authorities, infrastructure agencies and development interests around a clear roadmap, ensuring that future development is supported by adequate road access and high-quality public transport links, and reducing the risk of land being zoned but remaining undeveloped due to any uncertainties regarding the manner and/or timing of infrastructure delivery.

Notwithstanding any measures put in place to accelerate the development of the Fassaroe lands, the Housing Growth Guidelines (section 3.1) clearly state that it may be necessary to consider the zoning of alternative lands where lands, such as the full Fassaroe landbank, may not be fully developed in the short to medium term.

Recognising the strategic importance of Bray and Greystones-Delgany within the Dublin Metropolitan Area, and the need to maintain a strong pipeline of zoned and serviced land, the Office recommends that the Planning Authority identifies additional residential zoned lands within these areas with accessibility to existing and planned high-capacity public transport corridors, in accordance with the principles of Transit-Oriented Development (TOD) and consistent with NPO 97 of the NPF.

Looking beyond the current plan period, the proposed Variation recognises that the quantum of zoned land is not sufficient to meet the long-term housing growth requirement set out in the Housing Growth Guidelines to 2040. Given the importance of the settlements of Bray and Greystones-Delgany within the Dublin

Metropolitan Area, the Office also considers it critical that long term strategic and sustainable development sites / opportunity areas are identified in accordance with the Housing Growth Guidelines, to ensure that identified and required new infrastructure is delivered in tandem with new residential development, aligning within the lead-in time for infrastructure delivery and the provisions of the NPF related to TOD.

In this respect the Office notes that the Planning Authority has commenced a non-statutory 'Call for Sites', which could inform the consideration and response to the points raised in this submission, and the recommendations made below.

### **Recommendation 1 - Implementation of the Housing Growth Requirements**

Having regard to the need for development plans to be updated to reflect the new requirements of the National Planning Framework First Revision (2025) (NPF) in respect of housing, ensuring that the plan zones sufficient land for residential development with a realistic prospect of delivery within the plan period, and in particular to:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2042;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPO 97 of the NPF for planned growth in the metropolitan area along existing or planned high-capacity public transport corridors in accordance with the principles of Transit-Orientated Development;
- RPO 4.40 of the RSES to undertake the development of Bray-Fassaroe in collaboration with the Planning Authority, Dún Laoghaire-Rathdown County Council and transport agencies;
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy and Objective 3 to incorporate the objectives of the Housing Growth Guidelines within development plans; and
- the Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024), including appendix B: Measuring Residential Density,

#### **the Planning Authority is recommended to:**

- (i) clarify that Phase 2 / Priority 2 lands are available for immediate development;
- (ii) amend table 3.5 Wicklow core strategy to including the baseline housing growth requirement in accordance with appendix 1 of the Housing Growth Guidelines of 14,476 units to 2031, the quantum of zoned and serviced land available in each settlement to meet this requirement (HA), and the estimated housing yield / capacity of those lands;
- (iii) clarify the gross / net densities applied to the determination of how much capacity can be achieved on available zoned and serviced land and, if necessary, zone additional lands for residential development to provide a sufficient additional provision of zoned lands to achieve the housing growth requirement figures outlined in appendix 1 of the Housing Growth Guidelines;
- (iv) commit to the preparation of an Infrastructure Planning and Delivery Strategy for the Fassaroe lands, working together with Dún Laoghaire-Rathdown County Council, relevant infrastructure agencies including Transport Infrastructure Ireland, the National Transport Authority, and landowners. This strategy should establish a targeted and proactive approach to ensure the accelerated delivery of housing and associated infrastructure, services and amenities at this strategic location within the Metropolitan Area Spatial Plan area.

- (v) taking account of the significant transport infrastructure and accessibility constraints at the Fassaroe lands, and the potential that all of the lands may not be developed by 2031, identify additional residential zoned lands within the Dublin Metropolitan Area (Bray and Greystones-Delgany). This will ensure that the Wicklow County Development Plan 2022-2028 provides a robust and realistic framework to achieve the housing growth requirement figures outlined in appendix 1 of the Housing Growth Guidelines; and
- (vi) identify long term strategic and sustainable development sites / opportunity areas within the Dublin Metropolitan Area (Bray and Greystones-Delgany) to give clear strategic direction to future development locations, in consultation with infrastructure providers.

### Opinion of the Chief Executive

#### General

The proposed revised housing growth targets are in accordance with the new Ministerial Guidelines. These guidelines and the rationale behind the new figures for Wicklow can be found here:

[https://assets.gov.ie/static/documents/S.28\\_Guidelines - NPF Implementation - Housing Growth Requirements.pdf](https://assets.gov.ie/static/documents/S.28_Guidelines_-_NPF_Implementation_-_Housing_Growth_Requirements.pdf)

The growth rate deemed suitable for each settlement / group of settlements is set out in proposed Table 3.3. The tables show, that taking the new targets as a minimum, there is existing zoned and serviced land in the short to medium term, but not the longer term, to meet the new targets. Therefore no additional land is proposed to be zoned via this Proposed Variation. However in order to meet the medium to longer term needs, a process of identifying additional land has been commenced via the 'Call for Sites' and it is intended that these longer term needs will be address via a further variation or via integration into the next County Development Plan.

#### Calculation of targets

The target for each individual settlement / group of settlement was calculated as follows:

- The appropriate % growth target for the 2022-2031 period for each settlement / groups of settlements was identified having regard to its characteristics and carrying capacity
- The number of new units required calculated based on the growth rate from the baseline of 2022
- The number of new units completed between 2022 and Q2 2025 deducted<sup>2</sup>
- The Q3 2025 – Q4 2031 unit targets determined
- This target was shown in Column 1 of Table 3.5
- Units under construction or permitted awaiting commencement were deducted from this target, to determine *further growth* needed in each settlement in order to meet the 2031 target.

The new County target for the Q1 2025-Q4 2031 period is **14,476 units (Table 3.1)**

The total cumulative target for the Q3 2025 to Q4 2031 period is **17,908 units (Table 3.5, total of Column 1)**. It should be noted that this does not include the growth targets for Levels 7-10 of the hierarchy (c. 112 units per annum)

Therefore the growth target provided for in this Proposed Variation exceeds the target for Wicklow set out in the Ministerial Guidelines, **by c. 25%**.

<sup>2</sup> The data was not set out in the Proposed Variation, but was detailed in the CE Report issued to the elected members prior to the initiation of the Proposed Variation.

While not very clear, it appears that the OPR is seeking some clarity / explanation as to how the 'total figure' in Table 3.5 correlates to the new target set out in the Ministerial guidelines.

Overall the total growth target for Wicklow settlements is therefore approximately 25% above the 14,476 units set out in the Guidelines as the Council is keen to go **over and above** the minimum set out in the Guidelines and therefore a factor of c. 25% has been added.

The CE is happy to add additional explanation text to explain the difference between the two numbers.

Table 3.5 clearly shows the quantum of zoned and serviced land available in each settlement and therefore it is not clear why this is being requested by the OPR.

Similarly, the estimated potential housing yield for each town is shown in proposed Table 3.4 and therefore it is not clear why this is being requested by the OPR.

### **Headroom / additional provision**

For the purposes of the new Guidelines, planning authorities are requested to "*...address the scope for 'additional provision' of up to 50% in excess of the baseline housing growth requirement.*".

As set out in the Guidelines, "*'additional provision' recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan*". This additional 'factor' of 50% clearly relates therefore to the **zoning** of sufficient land over and above the minimum needed to meet a particular target. It is not a factor that is 'added' to the target but rather it is a factor that is added to the minimum amount of land needed to be zoned to achieve a particular target.

The key purpose of this 50% additional provision allowance is to allow for a supply of zoned land over and above that needed to meet the target in case that certain lands do not come forward within the lifetime of the plan, or certain lands when developed do not achieve the densities desired by the plan objectives and Ministerial density Guidelines.

Table 3.5 of the Proposed Variation identifies that there is a need for 234 ha of land to meet the revised housing targets in Column 1 of Table 3.5, but that there is currently 401ha of zoned and serviced land in the County. This is a surplus or 'additional provision' of 70%. **Therefore the desired 50% is achieved and exceeded.**

There is no requirement for 'additional provision' of 50% to be added to the housing targets set out in the Minister's Guidelines and **then** a further 50% 'additional provision' of zoned land provided.

Nevertheless, in the preparation of the Proposed Variation, the CE was keen for it to be emphasised that it is a given that the new targets should be seen as a 'minimum' and as it can be seen from Table 3.5 of the Proposed Variation, it is proposed to provide for a housing growth target up to 2031 in the settlements of Wicklow of c. 25% higher than the 2031 target set by the Minister and it is also shown that the amount of land currently zoned provides for c. 70% zoning headroom.

It should be further noted that this is a Proposed Variation to the current County Development Plan which applies up to 2028 only and any amendment proposed to the County Development Plan only requires to deal with the housing needs up to 2028. Nonetheless in order to provide for flexibility, a longer term horizon and the possibility of plan extension, the provisions of the Proposed Variation address needs up to 2031.

It is acknowledged in the Proposed Variation that the amount of currently zoned and serviced land will be unlikely to meet needs beyond 2031 and therefore the CE has committed to addressing this longer term need

by initiating a process of identifying suitable land for additional residential zoning. A 'Call for Sites' was commenced in December 2025 and submissions made will start to be evaluated in March 2026.

### **Status of Phase 2 / Priority 2 lands**

It is requested that it be made clearer that P2 land would now have the same status as P1 lands and would be deemed suitable for immediate development. It is not suggested how this should be done, as it is considered that proposed Core Strategy Objective 1 is very clear in this regard i.e. it states that such P2 lands would be supported within the lifetime of the plan which is between now (2026) and 2028; that is clearly the 'immediate' term.

### **Core Strategy Objective 1**

*All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.*

If it assists to add clarity, the CE confirms that applications for new housing are assessed on case-by-case basis on their own merits, against a range of development objectives and standards set out in the County Development Plan, and the proposed new CS1 objective will allow all residentially zoned sites, whether they be designated 'P1' or 'P2' to be assessed against all of these requirements on an equal footing.

In the context of the Government's stated urgent need to increase housing delivery, it is also clarified that proposed new CS Objective 1 will supersede<sup>3</sup> the following objectives in local plans (which will be highlighted as a 'change consequent' to the making of this variation):

#### **Wicklow Town – Rathnew LAP: WTR4**

*Notwithstanding the zoning / designation of land for new residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:*

- *75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.*

#### **Blessington LAP: BLESS7**

*Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following two conditions are satisfied:*

- *75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated) or after 3 years following adoption of the LAP, less than 50% of the RN1 lands have been activated;*

<sup>3</sup> Section 18(4) (b) of the PDA 2000 - A local area plan may remain in force in accordance with *paragraph (a)* notwithstanding the variation of a development plan or the making of a new development plan affecting the area to which the local area plan relates except that, where any provision of a local area plan conflicts with the provisions of the development plan as varied or the new development plan, the provision of the local area plan shall cease to have any effect.

- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.*

**Greystones-Delgany and Kilcoole LPF :GDK16**

*Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following conditions are satisfied:*

- *At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.*

It is also confirmed that the following 'changes consequent' will be made to the zoning matrix of said local plans to reflect CS1 i.e.

<p><b>RN1/RN2: New residential Priority 1</b></p>	<p>To provide for new residential development and supporting facilities during the lifetime of the LPF.</p>	<p>To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.</p>
<p><b>RN2: New residential Priority 2</b></p>	<p><del>To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement after the activation of Priority 1 lands.</del></p>	<p><del>To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.</del></p>

**Density**

It is suggested that assumptions made with respect to gross-to-net density may underestimate the need for zoned land. This is not considered accurate as this factor has been considered in the analysis carried out to prepare the Proposed Variation.

In particular, in the statement of the amount of zoned and serviced land available for residential development in each settlement set out in Table 3.5, lands that would be required for the following uses have been **discounted** and are not include in the figure stated:

- Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.
- Lands used for commercial development (inc. retail, leisure and entertainment).
- Lands for primary schools, churches and other community services and facilities.
- Larger, Regional or District Parks, Wayleaves or rights of way.
- Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.

*(Source: Table 1 of Appendix B of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024)*

In the assessment of the capacity of 'mixed use' lands in any town, which in most cases comprises 'town centre' zoned land, the capacity of said lands has been discounted by 50% to allow for partial use of these lands for commercial / community / other non-residential development. This is considered a very 'generous' discount and therefore is a robust assessment as it under-estimates the actual capacity of the land.

For example, in Newtownmountkennedy, available zoned 'town centre' zoned land as of Q3 2025 was calculated as 1.97ha. This was discounted by 50%, and a density of 35 dph applied to give said 1.97ha an assumed residential capacity of 34.5 units. However, since that date, a town centre zoned site of 0.17ha in Newtown has been granted permission for a mixed use development including commercial use at ground floor and 21 residential units. This is the equivalent of a density of 124 dph with no discount for the commercial space.

This was not detailed in the Proposed Variation, in the interests of legibility and understanding for the public, and in order to not have too many footnotes or caveats throughout the document. However this can be added if it better shows consistency with the guidelines.

### **Fassaroe**

The lands at Fassaroe have been zoned for residential development since 2008 and since that date, significant effort and investment has been made to bring the development of these lands to fruition. Unfortunately these efforts have been stymied by concerns regarding the impacts of the development of these lands on the N/M11. In order to address these concerns, in 2019 the NTA prepared a Transport Study for the area, in conjunction with WCC, DLRCC and the TII, which identified the infrastructural interventions that would be required for Fassaroe's delivery, including a phasing programme. Regrettably this phasing programme has also now become a barrier to the development strategy for the area, is considered **outdated** due to the passage of time, changes in the National Development Plan programme (particular as it relates to investment in the M/N11) and the significant changes in Government policy in particular with respect to activation of zoned housing land, and therefore requires reconsideration.

The CE agrees with the OPR that concerted effort is now required from all stakeholders and agencies to get these lands activated. The CE is happy to commit to the preparation of an Infrastructure Planning and Delivery Strategy for the Fassaroe lands, working together with Dún Laoghaire-Rathdown County Council, relevant infrastructure agencies including Transport Infrastructure Ireland, the National Transport Authority, and landowners, and the CE is hopeful that the Housing Activation Office will lead on this and will use its powers to intervene to support immediate development and remove policy or infrastructure impediments. These lands have already been brought to the attention of the HAO.

The majority of the lands zoned in Fassaroe are owned by developers who are very keen to move ahead in the immediate term (i.e. applications in 2026) with development (in the order of 3,000+ units), and therefore the concerns raised by the OPR are not considered fully accurate but it may not be aware of the considerable work / pre-planning meetings etc, being undertaken by said developers at this time.

### **Additional lands in Metropolitan Area**

The Proposed Variation does not suggest or 'bring forth' additional lands for zoning, as it is demonstrated in the tables set out in the Proposed Variation that there is zoned land in the short to medium term to accommodate the new housing targets. The Proposed Variation entails revisions to 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 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).

The Proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow; in particular it does not relate to the potential zoning of new lands for residential development or the extension of settlement boundaries, but rather it relates primarily to revising the housing targets for various settlements / areas within County Wicklow as set out in the Wicklow Core Strategy.

It is recognised in the Proposed Variation that there would not be adequate zoned and serviced lands in the County's settlements to meet the longer term housing targets beyond 2031. Wicklow County Council is committed to addressing this shortfall and in order to determine where there might be serviced / serviceable landholdings with interested owners, Wicklow County Council is separately running a **'Call For Sites'** consultation seeking expressions of interest from landowners for the future potential zoning of land for residential use and / or the extension of settlement boundaries.

As the public has very explicitly been advised that this variation process is not related to zoning, it is considered it would be inappropriate and unjust at this stage to change this variation into a re-zoning exercise as appears to be suggested by the OPR, as those members of the public that correctly did not make a submission to Variation 6 (but rather to the 'Call for Sites') but wish their land to be considered for zoning, would have been disenfranchised and excluded from proper consideration.

In addition, were this current variation to change approach and consider the zoning of new lands for residential use via the making of Material Amendments, the current process would require to be **paused** to allow for full SEA, AA and SFRA to be carried out which would require a number of months. The CE consider that this would not accord with the spirit of the Minister's Guidelines which seeks rapid action to unlock the development of zoned / serviced land in the immediate term, and this is exactly what the Proposed Variation as currently proposed would do, by removing any artificial Core Strategy 'targets' as a barrier and releasing Phase 2 lands immediately.

This two stage process is considered the most appropriate as it allows for a rapid amendment to the County Development Plan to allow already zoned and serviced land to come forward immediately by removing any policy blockages, while allowing for more careful consideration of new zoning requests to be carried out thereafter and consultation with the public and elected members.

### Chief Executive's Recommendation

#### Amend Proposed Variation as follows:

##### Recommendation 1

#### Add the following sentence beside Table 3.5

*The new housing target for 2025-2031 as provided for County Wicklow by the new Guidelines for the 2025-2031 period is 14,476 units (Table 3.1).*

*Table 3.5 shows the new targets for the Level 1-6 settlements in the County as 17,908 units.*

*Therefore the new target 2025-2031 exceeds the Guidelines by c. 25%.*

##### Recommendation 2

#### Amend Table 3.5 as follows:

Table 3.5, add the following footnote to Column 8

*'This is the net amount of land required to accommodate the target number of residential units'*

Table 3.5, add the following footnote to Column 9

*'This is the net amount of zoned land available for residential development'; lands required for major road/streets, for commercial development (inc. retail, leisure and entertainment), for primary schools, churches and other community services and facilities, for larger, regional or district parks, wayleaves or rights of way and other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding have not been included in this figure'*

No.	Name	Link to submission
37	National Transport Authority	<a href="#">National Transport Authority</a>

#### Issues Raised

The NTA welcome and support the proposed variation which takes account of recently published Guidelines for Planning Authorities, namely '*NPF Implementation: Housing Growth Requirements*' and '*Sustainable Residential Development and Compact Settlements*'. The NTA note the new housing targets which the Local Authority have incorporated to reflect the new guidelines and the associated changes proposed to the County's Core Strategy. It is considered that a continued focus on the delivery of sustainable transport infrastructure and services in the County will assist with the fulfilment of these targets.

The emphasis placed on compact growth as part of the Variation is acknowledged and it is considered that this can be supported through Transport Oriented Development (TOD), in line with the Avoid – Shift – Improve approach set out in the National Sustainable Mobility Policy. This not only promotes sustainable travel patterns and healthy urban environments, but may also reduce the need for additional infrastructure provision, thereby reducing the timescales involved for housing delivery. It is important that this policy is appropriately implemented at the settlement level and that sites which could potentially align with TOD principles are adequately promoted and supported as part of any future local land use plans.

With regards to future transport provision in the County, existing frameworks should continue to be used for planning and investment purposes, namely the Transport Strategy for the GDA and the transport plans that have been prepared for the County's primary settlements as part of their respective land use plans. For significant settlements where LTP's have not been prepared, the preparation of same should be a short-term priority, through engagement with the NTA and TII. These frameworks can ensure schemes are prioritised in a manner that best supports the transport demands of each settlement and ensure that transport networks are integrated with land use plans

The NTA are open to continued engagement with WCC on planning and transport matters in Wicklow and would encourage the local authority to engage with the NTA in relation to the commencement of a Local Transport Plan for Bray. As sites in the County continue to be brought forward for residential use, a plan-led and phased approach to their development should continue to be implemented, based on close collaboration between the local authority and key service providers including the NTA. This can ensure housing targets are delivered in a timely manner and in a form that supports the proper planning and sustainable development of the County.

#### Opinion of the Chief Executive

All of the points raised are noted.

The CE is particularly keen to work with the NTA to prepare a Transportation Infrastructure Planning and Delivery Strategy for Bray and the Fassaroe lands, working together with Dún Laoghaire-Rathdown County Council and Transport Infrastructure Ireland.

#### Chief Executive's Recommendation

No change required to Proposed Variation

No.	Name	Link to submission
15	Transport Infrastructure Ireland	<a href="#">Transport Infrastructure Ireland</a>

### Issues Raised

Transport Infrastructure Ireland's mission is to deliver transport infrastructure and services, which contribute to the quality of life for the people of Ireland and support the country's economic growth. TII safeguards the strategic function of National Roads to promote the safe and efficient operation of the national roads network in accordance with official policy set out in the commensurate Section 28 Guidelines *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012), and in accordance with *Project Ireland 2040*, *National Planning Framework* and *National Development Plan 2021 – 2030*; the National Sustainable Mobility Policy; and the *EMRA Regional Spatial and Economic Strategy* (RSES).

County Wicklow is served and traversed by essential motorway, national primary and secondary elements of the national roads network: the M/N11 and the N81. Under the Trans-European Transport Network (TEN-T) M/N11 corridor is identified as part of the TEN-T Comprehensive Network and critical for access to Rosslare Europort. As the Council is aware the TEN-T Regulations identify a critical network of national roads, rail, ports and airport infrastructure. The Council are reminded that national roads network caters for Ireland's inter-urban and inter-regional transport requirements and gives access to regional and international markets through strategic airport and port locations.

TII welcomes and is supportive of proposals aimed at achieving *Project Ireland 2040* National Strategic Outcomes (NSOs) and the incorporation of *NPF Implementation: Housing Growth Requirements Guidelines* by this proposed variation where they are complementary to the requirements of official policy concerning maintaining the strategic capacity and safety of the national road network in accordance with *NSO 2 Enhanced Regional Accessibility*. To assist co-ordination, this submission therefore seeks to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads in County Wicklow continue to be safeguarded by relevant Wicklow County Development Plan policies and objectives.

Having regard to the published proposed variation proposing alterations to Chapter 1 Introduction & Strategic Context, Chapter 3 Core Strategy and Chapter 6 Housing of the current County Development Plan, the Authority submits the following observations for the Council's consideration:

#### **Proposed Development Variation no. 6 and the role of Transport Infrastructure Ireland (TII)**

The national roads network is a strategic transport asset of critical national importance. TII has reviewed the proposed variation and determines a potential collaboration role intended by proposed Core Strategy *Objective 3* which states as follows:

*"Wicklow County Council will proactively work with infrastructure / utilities providers to ensure any service related impediments to the granting of permission for housing on zoned lands or to the delivery of permitted housing development are progressed."*

TII notes that proposed variation revised Population & Housing Allocations (section 3.34 of the Plan) do not currently propose additional or revised land use zoning extents which will be function of Local Area Plan (LAPs) and / or Local Planning Frameworks (LPFs) as stated at section 3.45 Zoning of the Plan.

TII also notes that the proposed variation does not propose to alter Plan policies and objectives specific to the national roads network.

TII also notes that certain National Policy Objective (NPOs) from the First revision of the NPF are listed at revised Population & Housing Allocations (section 3.34 of the Plan) as assisting the Council *"in determining*

*appropriate growth rates for each settlement / tier". TII would also highlight NPO 107 "Continue to ensure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes".*

In accordance with NPO 107, TII seeks to ensure that national roads network objectives are not undermined and that the anticipated benefits of the investment made in the national roads network are not jeopardised. In this regard, and in pursuance of proposed *Core Strategy Objective 3*, TII is available to assist the Council in preparing appropriate evidence based transport assessments to address development and / or land use zoning proposals in the proximity of national roads where such proposals are demonstrated as being in accordance with the provisions of official policy in the first instance.

The Council is advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures arising for the national roads network to accommodate local development proposals will be borne by the local authority. Such schemes will not be funded by TII. Thus, costs should be integrated within future local development contributions schemes.

TII welcomes the safeguarding of the strategic role of the national road network and associated junctions in catering for the safe and efficient movement of inter-urban and inter-regional strategic traffic in the implementation of the proposed variation. TII reiterates its availability to assist the Council and is available for consultation in relation to matters arising and impacting the strategic national road network in the County.

#### **Opinion of the Chief Executive**

All of the points raised are noted.

The CE is particularly keen to work with Transport Infrastructure Ireland to prepare a Transportation Infrastructure Planning and Delivery Strategy for Bray and the Fassaroe lands, working together with Dún Laoghaire-Rathdown County Council and the NTA.

#### **Chief Executive's Recommendation**

No change required to Proposed Variation

No.	Name	Link to submission
2	Office of Public Works	<a href="#">Office of Public Works Flood Risk Management</a>

#### Issues Raised

The Office of Public Works (OPW), as lead agency for the coordination of an integrated, 'whole-of-Government' approach to flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028.

This submission is made specifically concerning flooding and flood risk management. Further submissions on the variation may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The OPW has carried out a review of the documents and notes that any changes as a result of this variation are unlikely to impact the level or nature of flood risk.

Should any changes to zoning designations in areas of flood risk be implemented in the future, it is important that a flood risk assessment to an appropriate level of detail is carried out and that there is appropriate justification for any decisions made as set out in the Guidelines.

#### Opinion of the Chief Executive

All of the points raised are noted.

#### Chief Executive's Recommendation

No change required to Proposed Variation

No.	Name	Link to submission
3	<b>Maritime Area Regulatory Authority</b>	<a href="#">The Maritime Area Regulatory Authority</a>

### Issues Raised

The Maritime Area Regulatory Authority, or MARA, is a new state agency that was established on 17th July 2023. MARA's functions are set out in the Maritime Area Planning Acts 2021 and 2022, and extend to the entire maritime area, from high water of ordinary tides to the outer limit of the continental shelf, encompassing the State's territorial seas and Exclusive Economic Zone. MARA facilitates a streamlined consenting process for projects in the maritime area and a route for projects to the planning system, by assessing applications for Maritime Area Consents (MACs) which are the right to occupy the maritime area. MARA's functions in this new consenting system for the maritime area include the following;

- Assessing Maritime Area Consent (MAC) applications for the maritime area, prior to seeking development permission;
- Assessing Marine Usage licences (MUL) applications for Schedule 7 specified activities;
- Compliance and enforcement of MACs, MULs, and An Coimisiún Pleanála development consents;
- Investigations and prosecutions;
- Administration of the existing Foreshore consent portfolio;
- Fostering & promoting co-operation between regulators of the maritime area.

For any further information on MARA or to view any MAC or MUL applications, please visit the MARA website: [www.maritimeregulator.ie](http://www.maritimeregulator.ie) or the following link; [Applications & Determinations - MARA - Maritime Area Regulatory Authority](#)

The GIS Data Download section of the MARA website has been updated with a Web Feature Service (WFS) for newly 'Determined' applications in ESRI Shapefile format: <https://www.maritimeregulator.ie/knowledge-centre/data-downloads/>.

The Maritime Area Regulatory Authority (MARA) welcomes the opportunity to submit our views on any planning applications within and directly adjacent to the maritime area. MARA is a prescribed body by virtue of Section 279A of the Planning & Development Act 2000 (as amended) for the purposes of Part XXI 'Maritime Development'. For the purposes of consultations on maritime planning applications MARA would welcome early notification by email to [consultation@mara.gov.ie](mailto:consultation@mara.gov.ie) providing the following;

Planning application reference number

Deadline for submission

Link to where the application details can be viewed online

MARA wish to highlight that any proposed development within the maritime will in general require a Maritime Area Consent (MAC) prior to seeking planning permission, unless privately owned maritime site, or an existing foreshore lease or licence for the proposed can be demonstrated. Please note that a MAC specifies the permitted maritime usage and accordingly, the planning application and approval should only consider this usage. The MAC also specifies the spatial representation (map) of the consent area. In accordance with Section 96 of the Maritime Area Planning Act 2021, the holder of a MAC shall, before expiration (if any) of the MAC, rehabilitate that part of the maritime area subject of the MAC.

### Coastal Planning Authority

Having regard to the extent of the maritime area, the Coastal Planning Authority should be cognisant of the requirements of the Maritime Area Planning Act 2021 (as amended). Under the MAP Act the functional area of a planning authority is extended to include the 'nearshore area'. In this regard MARA would remind the Coastal Planning Authority of the requirement for MACs and MULs in the maritime area. The Coastal Planning Authority shall also have regard to the objectives of the National Marine Planning Framework (NMPF) in the preparation of any plan review and the associated environmental assessments. The NMPF recognises the

importance of integration between land and marine planning, ensuring that national, regional, and local area plans are consistent with the NMPF where activities may impact both areas.

MARA notes the purpose of the Proposed Variation 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). These Guidelines provide new housing growth requirements to planning authorities in order to facilitate the revision and update of development plans in accordance with the National Planning Framework (NPF) Revision approved in April 2025. This Variation therefore relates primarily to revising the housing targets and housing objectives for various settlements / areas within County Wicklow as set out in the Wicklow Core Strategy in the Wicklow County Development Plan 2022-2028. It is noted that no amendments to any zoning objectives are being made, no additional lands are being zoned, and no settlement boundaries are being extended. MARA therefore have no additional comments in this regard.

#### **Opinion of the Chief Executive**

All of the points raised are noted.

#### **Chief Executive's Recommendation**

No change required to Proposed Variation

No.	Name	Link to submission
4	Environmental Protection Agency	<a href="#">Environmental Protection Agency</a>

### Issues Raised

In our role as an SEA environmental authority under the SEA Regulations, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into plans and programmes and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan or programme. Our functions do not include approving or enforcing SEAs or plans or programmes.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via our guidance document '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land use plans. In finalising your SEA screening determination, we suggest that you take this guidance document into account and incorporate the relevant recommendations as relevant and appropriate to the plan or programme.

### SEA Determination

If a proposed SEA determination hasn't been made regarding the plan or programme, you should determine whether implementing the plan or programme would be likely to have significant effects on the environment. The SEA Regulations, Schedule 2A (S.I. No. 436 of 2004, as amended) or Schedule 1 (S.I. No. 435 of 2004, as amended), as appropriate, set out the '*Criteria for determining whether a Plan is likely to have significant effects on the environment*' to use to determine whether the plan or programme would be likely to have significant effects on the environment.

Guidance on the SEA process, including an SEA pack and checklist, is available on our website at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-resources-and-guidance/>.

We recommend that you take the available guidance into account in making your SEA Screening Determination and incorporate the relevant recommendations as relevant and appropriate to the plan or programme.

### EPA SEA Screening Guidance

Our [Good Practice Guidance for Strategic Environmental Assessment \(SEA\) Screening](#) (EPA, 2021) provides specific stand-alone guidance to assist plan or programme makers and SEA practitioners. It focuses primarily on plans/programmes in the non-land use sector in Ireland and includes an elaboration of the steps needed for screening, the legislative landscape underpinning SEA screening, and step-by-step process and templates to assist in preparing the required documentation.

### Strategic Environmental Assessment: Guidelines for Planning Authorities

The [Strategic Environmental Assessment: Guidelines for Regional Assemblies and Planning Authorities](#) (DHLGH, 2022) provides advice on carrying out SEA in the land-use planning sector for those plans listed in S.I. No.436 of 2004, as amended. These plans comprise regional, county and local plans, including Regional Spatial and Economic Strategies, County or City Development Plans, variations of Development Plans, Local Area Plans and Planning Schemes for Strategic Development Zones. The Guidelines replace previous guidance for Regional Authorities and Planning Authorities published in 2004.

### **Alignment with the National Planning Framework First Revision**

National Policy Objective 1 of the National Planning Framework (NPF) First Revision requires that all plans, projects and activities requiring consent arising from the NPF are subject to the relevant environmental assessment requirements including SEA, EIA, SFRA and AA as appropriate. Where existing zoning in the County Development Plan (CDP) does not accommodate the proposed increase in housing targets, as set out in the NPF, for the county and has not been previously assessed under SEA, AA, and SFRA at an appropriate level, then consideration should be given to these assessments for additional zoning and/or rezoning of lands that have potential for significant environmental effects.

In particular, we highlight potential for significant negative effects on population and human health, water quality (see Water Action Plan) and flood risk, biodiversity, flora and fauna, landscape and soil. In addition, climatic factors should be considered with reference to the most up to date Climate Action Plan and relevant Flood Risk Management Plan. The availability and capacity of existing critical infrastructure including wastewater and water supply should be considered in the context of the likely population increase associated with the proposed housing target being accommodated.

You're also referred to the Environmental Monitoring set out in Table 7.1 of the NPFs SEA Statement. This monitoring should be reflected, where relevant and appropriate, in the context of future, environmental monitoring and related reporting associated with the revised CDP implementation.

### **Sustainable Development**

In proposing and in implementing the plan or programme, you should ensure that the plan or programme is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the plan or programme.

In considering the plan or programme, you should take into account the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

You should also ensure that the plan or programme aligns with any key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the relevant Regional Spatial and Economic Strategy.

The Plan should also align with the OPW's '[The Planning System and Flood Risk Management Guidelines for Planning Authorities](#)' (OPW, 2009), as relevant and appropriate, in the zoning and development of lands.

### ***Ireland's State of the Environment Report 2024***

In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered, and relevant aspects integrated as appropriate, in implementing the Plan outputs/ recommendations. It is available at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report/>.

### **Available Guidance & Resources**

Our website contains various SEA resources and guidance, including:  
SEA process guidance and checklists;  
Inventory of spatial datasets relevant to SEA;

Topic and sector specific SEA guidance (including *SEA and Integration Guidance* (EPA, 2025), *Good practice note on Cumulative Effects Assessment* (EPA, 2020), *Developing and Assessing Alternatives in SEA* (EPA, 2015), and *Integrated Biodiversity Impact Assessment* (EPA, 2012)).

You can access these guidance notes and other resources at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-topic-and-sector-specific-guidance/>

### **EPA SEA WebGIS Tool**

Our SEA WebGIS Tool has been updated recently and is now available at <https://gis.epa.ie/EPAMaps/SEA>. It allows an indicative report on key aspects of the environment in a specific geographic area to be produced. It is intended to assist public authorities in SEA screening and scoping exercises.

### **Catchments.ie**

Our <https://www.catchments.ie/maps/> website provides a single point of access to water quality and catchment data from the National WFD monitoring programme.

### **Future amendments to the plan or programme**

Where changes to the plan or programme are made prior to finalisation, or where modifications to the plan or programme are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 2A (S.I. No. 436 of 2004, as amended) or Schedule 1 (S.I. No. 435 of 2004, as amended) of the SEA Regulations, as appropriate.

### **Appropriate Assessment**

You should ensure that the plan or programme complies with the requirements of the Habitats Directive where relevant. Where an Appropriate Assessment is required, the key findings and recommendations should be incorporated into the SEA and the plan or programme.

### **EPA AA GeoTool**

Our AA GeoTool application has been developed in partnership with the National Parks and Wildlife Service. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: <https://gis.epa.ie/EPAMaps/AAGeoTool>.

### **Environmental Authorities**

Under the SEA Regulations, prior to making your SEA determination you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage,
- Minister for Climate, Energy and the Environment; and,
- Minister for Agriculture, Food, and the Marine.

For land use plans covered under S.I. No. 436 of 2004, as amended, you should also consult with: any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

### **SEA Determination**

As soon as practicable after making your determination as to whether SEA is required or not, you should make a copy of your decision, including, if appropriate, the reasons for not requiring an environmental

assessment, available for public inspection in your offices and on your website. You should also send a copy of your determination to the relevant environmental authorities consulted.

#### **Opinion of the Chief Executive**

All of the points raised are noted.

The Proposed Variation has been subject to SEA and AA screening, in accordance with the various legislation, and guidance detailed in this submission.

Should any material alteration be proposed to the Proposed Variation, these alterations will similarly undergo screening and if found necessary, full SEA and Stage 2 AA.

#### **Chief Executive's Recommendation**

No change required to Proposed Variation

No.	Name	Link to submission
35	Department of Transport	<a href="#">Department of Transport</a>

**Issues Raised**

In respect of the Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028 the Department of Transport (DoT) welcomes the opportunity to provide the following general observations. Note that these observations are a statement of the general principles, objectives, and policy imperatives which are under the remit of the Department of Transport, to be considered in reviewing or finalising the Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028.

**Sustainable Urban Mobility Planning**

The concept of Sustainable Urban Mobility Planning (SUMP) has been around for some time and has been developed at a European level through several key policy instruments. The European Commission formally introduced the concept of Sustainable Urban Mobility Plans (SUMPs) in its 2013 Urban Mobility Package. This provided a strategic framework for cities to develop integrated, multimodal transport plans that promote sustainability, accessibility, and quality of life with updated SUMP guidelines issued in 2019.

The European Urban Mobility Framework launched by the European Commission in 2021 highlighted that cities and regions need to play an even bigger role in the TEN-T of the future to improve mobility and transport flows and reinforced SUMPs as a tool for cities to reduce emissions and improve mobility.

In July 2024, the revised TEN-T Regulation, Regulation (EU) 2024/1679, entered into force. It strengthens the role of cities, as vital enablers of sustainable, efficient and multimodal transport. The Regulation designates certain cities as urban nodes and sets out specific requirements for them in order to promote seamless traffic flows from, to and across urban nodes on the TEN-T network. For the first time this legally mandates Urban nodes on the Network to develop and implement a SUMP by 31 December 2027.

In Ireland, our Metropolitan Area Transport Strategies (MATS), including the Greater Dublin Area Transport Strategy, developed by the National Transport Authority in consultation with the Local Authorities are the national equivalent of SUMPs. Full alignment with SUMP requirements as set out in Annex V of the Regulation will have to be ensured when the strategy is being reviewed.

To that end we have established a National SUMP Programme with the National Transport Authority to provide assistance on the development and implementation of SUMPs.

A national SUMP Network has also been established to facilitate collaboration, and knowledge sharing among local authorities working within Ireland’s designated urban nodes and relevant local authorities are asked to engage with the Network.

**Integrated Land Use and Transport Planning**

The National Planning Framework affirms a strong commitment to Transport Orientated Development (TOD), which is defined as a form of urban development that seeks to maximise the provision of housing, employment, public services, and leisure space near frequent, high quality transport services. TOD is to be achieved through a variety of targets that prioritise a certain amount of new housing development to occur within cities and the existing footprint of built-up settlements.

National Policy Objective 97 seeks to deliver TOD at suitable locations as identified in Metropolitan Area Strategic Plans.

The Department of Housing, Local Government and Heritage and the Department of Transport jointly established a working group in December 2021 under the Government's Housing for All plan to consider opportunities for TOD in major urban centres. The group comprises membership from both Departments, the National Transport Authority (NTA) and the Land Development Agency (LDA).

The first report from this Working Group looked at opportunities in Dublin and was published in 2023. Reports on Cork, Limerick, Galway, Waterford and the Eastern Region are at finalisation stage.

The Department of Transport can assist with appropriate text in the proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028 if desirable.

#### **Opinion of the Chief Executive**

All of the points raised are noted.

The Wicklow executive has made submissions to the DoT regarding sites that it considers should be designated for 'TOD' and we look forward to receiving the final report showing which sites have been approved for designation and associated support. The sites put forward were:

- Bray golf club and harbour
- Bray Fassaroe
- Wicklow harbour and Murrough
- Arklow quays and harbour
- Arklow Tinahask

#### **Chief Executive's Recommendation**

No change required to Proposed Variation

No.	Name	Link to submission
91	Uisce Éireann	<a href="#">Uisce Éireann</a>

#### Issues Raised

Uisce Éireann (UÉ), acknowledges receipt of notification of the proposed Variation No. 6 of the Wicklow County Development Plan 2022-2028 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 a few general comments as follows:

**Chapter 1** Introduction- We note and welcome the inclusion of recently adopted LAPs

**Chapter 3** Core Strategy Population & Housing Targets - We have no objection to the revised targets in line with national policy. We note that Greystones-Delgany has changed from the Core Region to Metropolitan Area.

**Chapter 6** Housing Section 6.3.5 A general comment on changing densities & density ranges across town centres / urban neighbourhoods / extensions: Development sites with higher densities may require watermain and / or sewer network upgrades both locally and downstream. Where there is no committed UE project, upgrades shall be developer led.

#### Opinion of the Chief Executive

All of the points raised are noted.

With respect to Greystones-Delgany, this settlement has always been in the Metropolitan Area but it was regrettably incorrectly labelled in Table 3.3 (now Table 3.2) as being in the 'Core Region.' This error is proposed to be corrected via the variation and no change in designation / role is proposed.

#### Chief Executive's Recommendation

No change required to Proposed Variation

No.	Name	Link to submission
97	Electricity Supply Board	<a href="#">Electricity Supply Board</a>

### Issues Raised

Electricity Supply Board (ESB) welcomes this opportunity to make a submission to Proposed Variation No. 6 to the Wicklow County Development Plan 2022-2028 (CDP). ESB is a landowner and employer in Wicklow with property and infrastructural assets throughout the County.

ESB acknowledges the aim of the Proposed Variation to update the Core Strategy within the Wicklow County Development Plan, including the revision of housing targets as outlined in the written statement. In particular, ESB recognises the need to reflect the '*National Planning Framework (NPF) Implementation and associated Housing Growth Requirements*' within the County Development Plan.

The provision of a secure, reliable, and efficient energy transmission and distribution infrastructure is fundamental to powering and heating homes and businesses, as well as supporting the decarbonisation of transport. The Government's new housing plan called "*Delivering Homes, Building Communities*" recognises that each new home constructed today requires roughly double the electrical capacity as those built before 2019. This increased reliance on electricity, combined with climate change impacts such as extreme weather events, are driving the need to enhance the reliability and resilience of the network. In the coming years, the electricity networks must be expanded and reinforced to support the delivery of 300,000 homes.

The proposed variation aims to vary the existing County Development Plan so that it aligns with the revised National Planning Framework and the 2025 Section 28 Housing Growth Requirements, incorporating refreshed housing objectives, and revised policy objectives that place greater emphasis on the appropriate use of Residential Phase 1 and 2 lands to support increased housing delivery. In this regard, below are observations from ESB that should be considered for this Variation.

#### **Overview of ESB Strategy**

ESB is Ireland's foremost energy company and the largest supplier of renewable electricity in Ireland. Through innovation, expertise, and investment, ESB is leading the way in developing a modern, efficient electricity system that is capable of delivering sustainable and competitive energy supplies to customers in the 'all-islands market' (Republic of Ireland, Northern Ireland, England, Wales and Scotland). ESB operates a renewable energy portfolio that has a total of over 1.8GW of green energy generation connected to the grid.

To support transformation of the energy sector, ESB is embracing new technologies that are revolutionising the energy industry, including smarter electricity networks. We are investing in sustainable energy solutions that harnesses the power of solar, wind, wave, storage and green hydrogen to provide a cleaner future. Meanwhile, we continue to play a key role in maintaining our existing operations to support security of supply for Ireland. Our objective is to develop and connect renewables to decarbonise the electricity system by 2040. ESB's progress towards achieving carbon net-zero operations is consistent with the objectives of the National Planning Framework (NPF) and Regional Spatial & Economic Strategy (RSES) for the Eastern & Midland Region.

#### **ESB Networks**

ESB Networks is firmly committed to expanding electricity network capacity across Ireland to meet the demands of a growing population, accelerated housing development, industrial growth, and national climate objectives. As part of ESB Networks' Price Review 6 (PR6), covering the period 2026 to 2030, the organisation proposes substantial infrastructure investments at all voltage levels—high, medium, and low—including upgrades to overhead lines, cables, transformers, and substations. Particular emphasis is placed on 110kV

stations, which are currently overloaded due to rapid demand growth. The plan also includes converting 10kV medium voltage networks to 20kV to reduce losses and enhance capacity. These investments are strategically targeted to address current constraints while creating headroom for future growth.

In addition to physical upgrades, ESB Networks will deploy smart, flexible, and digitally enabled solutions to optimise asset utilisation and reduce reliance on traditional reinforcements. By 2030, the network will deliver 562 MW of firm transformer capacity at 110 kV in Dublin, 1.1 GW at 38kV nationwide, and 1.5 GW at medium voltage nationwide. This will enable faster customer connections, facilitate maintenance and asset replacement, and support the electrification of heat, transport, and industry. These efforts are essential to ensuring a reliable, resilient, and future-proof electricity system that supports Ireland's transition to a Net Zero-ready energy network.

### *Energy Infrastructure – Planning Policy*

Ireland is embarking on a major expansion of its electricity infrastructure to address critical capacity shortages and support national growth objectives. Under the 2025 National Development Plan (NDP) Review, the Government has committed €3.5 billion in equity funding to ESB Networks and EirGrid to significantly enhance grid capacity and resilience. This investment is strategically aligned with the goal of delivering 300,000 new homes by 2030 and meeting Ireland's climate and competitiveness targets. The electricity network is increasingly strained by rapid population growth, urban development, and the electrification of heating, transport, and industry. As mentioned above, each newly constructed home now requires approximately twice the electrical capacity compared to those built prior to 2019. This increase combined with growing demand from other sectors has resulted in many high-voltage stations becoming overloaded, and forecasted demand for 2030 exceeds current capacity in key regions.

As outlined in the Delivering Homes, Building Communities 2025-2030, An Action Plan on Housing Supply and Targeting Homelessness, it is essential that Ireland's electricity networks are expanded and reinforced over the coming years to support the delivery of 300,000 new homes by 2030.

To address this, ESB Networks' PR6 Business Plan proposes a €13.4 billion programme, including €10.1 billion in baseline investment, to reinforce network capacity across all voltage levels, integrate 4.4 GW of utility-scale renewables, and deploy smart, flexible technologies to manage complex energy flows. The plan also introduces an Agile Investment Framework to manage delivery risks and avoid unnecessary upfront costs to customers. Together, these measures represent a decisive shift towards a future-proofed, Net Zero-ready electricity system that underpins Ireland's housing, economic, and climate ambitions.

### *Energy Infrastructure - Transmission and Distribution*

ESB is continuously assessing and reviewing electricity network capacity in County Wicklow to ensure alignment with current and future development needs. Through ongoing studies and monitoring, ESB identifies where reinforcements, upgrades, or new infrastructure may be required to support residential, commercial, and industrial growth. This proactive approach ensures that additional projects can be brought forward in a timely manner to facilitate further development in the region.

**To support this, ESB requests that Wicklow County Council and ESB coordinate closely to identify suitable sites for the delivery of key electricity infrastructure. Early identification and zoning of such sites will be critical to ensuring timely and cost-effective delivery of infrastructure that underpins regional growth and climate action targets.**

ESB would welcome opportunities to future-proof the delivery of electricity infrastructure through greater collaboration with Local Authorities. Early engagement at the design stage of key public infrastructure projects—such as new roads, public realm upgrades, and greenways—offers opportunities to incorporate

ducting and underground cabling in the most economically efficient way, while minimising disruption to local services. We encourage project teams to contact the local ESB Networks Office to ensure input from ESB Networks at the earliest stage of project design.

ESB owns and operates a comprehensive portfolio of electricity transmission and distribution assets across County Wicklow. These assets are integral to ESB's operations at local, regional, and national levels. The existing electricity grid in the region currently possesses limited capacity to accommodate new development, particularly in North Wicklow. This constraint, until resolved, will impede the attainment of the targeted growth and development in Co. Wicklow.

ESB currently owns and operates 32 No. high-voltage substations within the boundaries of Wicklow County. Strategically situated across the county, these assets serve as a crucial component in supporting ESB's operations at both the regional and national levels. At present, the electricity grid in this region is constrained by limited capacity for accommodating new development. Unless these constraints are addressed, they will hinder the achievement of the targeted future growth for County Wicklow. Some of the issues are addressed below.

### **North Wicklow**

North Wicklow is currently under significant pressure, and major upgrades will be essential to support planned development. ESB intends to expand the Fassaroe 110 kV station to unlock capacity and support new MV networks towards Bray and Greystones. In addition, a new 220 kV station and a separate new 110 kV station are planned to reinforce the wider Greystones area, supported by new circuits and looping-in of existing circuits. These works will underpin new MV circuits towards Greystones and Kilcoole and provide critical voltage support. Further uprating of several 38 kV circuits will also be required over the next 5–10 years. These measures are designed to strengthen network resilience and ensure the grid is equipped to accommodate future demand by increasing circuit capacity. Such interventions are essential to meet projected residential and economic demand.

### **South Wicklow**

There is an urgent requirement for substantial reinforcement of both the existing transmission and distribution networks within south Wicklow. In Arklow, the station north of the River Avoca can accommodate some additional demand, but may require further uprating depending on the final housing allocation, while capacity is already constrained at the Tinahask 38kV station south of the river; an uprate of the Tinahask 38kV substation is planned for completion by 2028/29 alongside a new station to be delivered in PR7 (2031-2035), with site identification ongoing. Wicklow Town and Rathdrum can accommodate some additional demand, but both may require further uprating depending on the final housing allocation, while Ashford, Aughrim, Carnew and Tinahely also exhibit constrained capacity and are likely to need reinforcement. Shillelagh will require uprating of the existing station during PR7 and delivery of a new loop-in circuit in PR6 to maintain resilience.

While we recognise that the Proposed Variation No. 6 is relatively straightforward, ESB also notes the recent publication of the Section 28 Guidelines on National Planning Framework Implementation – Housing Growth Requirements (2025), as well as the approval of the Revised National Planning Framework in April 2025. ESB is committed to proactively engaging with Wicklow County Council as these updated guidelines are incorporated into the County Development Plan. We are ready to meet with the Council to discuss the impact of revised housing growth requirements, particularly regarding new residential zoning and the planning of supporting infrastructure. This collaborative approach will help align development objectives with national housing targets and ensure the timely delivery of essential electricity infrastructure.

### **Energy Infrastructure – Medium and Low Voltage Network**

At a localised level, ESB Networks has undertaken a comprehensive review of the Medium and Low Voltage (MV/LV) network throughout County Wicklow. This assessment examined the distribution of customers across MV/LV unit substations to determine where upgrades or the provision of additional unit substations may be necessary. The objective is to support the decarbonisation of the electricity network and to facilitate the transition of customers to Low Carbon Technologies including heat pumps, solar photovoltaic systems, and electric vehicle charging infrastructure.

This review has resulted in identified areas where additional MV/LV substations and upgrades to existing substations are required. New MV/LV (10kV/400V) unit substations require a space of approximately 3 square metres and are typically sited in public locations, subject to agreement with landowners and/or local authorities.

As of the present, County Wicklow contains a total of 656 No. ground-mounted MV/LV unit substations across the County. Projections indicate that by 2040, 255 No. of these unit substations will be operating beyond their designed capacity. Of these, 227 No. unit substations are suitable for upgrading, while an additional 28 No. unit substations will be necessary to meet anticipated demand. The majority of these MV/LV unit substations are primarily located within the county's main urban areas, specifically Bray, Greystones, and Arklow. The table below details the number of additional substations required for the following towns.

<b>Town</b>	<b>No. of additional MV/LV unit Substations required</b>
Bray	10
Greystones	5
Mountkennedy	2
Wicklow	1
Rathdrum	1
Arklow	5
Carnew	1
Blessington	1

To guarantee the delivery of a secure, reliable, and efficient electricity network for customers in urban town areas, it is essential that the Wicklow County Development Plan incorporates robust policy objectives supporting the reinforcement of the medium and low voltage (MV/LV) network. This will ensure that sufficient capacity is available to accommodate increasing demand. In this regard, ESB requests that Wicklow County Council support the recommended energy infrastructure developments set out in this submission, consistent with Policy CPO 16.18, which states.

*"To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required."*

To support this, ESB requests that Wicklow County Council and ESB coordinate closely to identify suitable sites for the delivery of key electricity infrastructure to address capacity issues in the MV/LV network. The proactive identification of suitable sites, along with the inclusion of provisions within the zoning matrix that allow for public utilities permissibility under all zoning objectives, is essential for the timely and cost-effective delivery of infrastructure. This approach will promote local and regional growth while advancing the achievement of climate action objectives.

### **Conclusion**

Investment in infrastructure is crucial to the economic and social well-being of our country. There is a significant multiplier effect from investment in infrastructure which means that it stimulates growth in the local economy. This investment in infrastructure is also necessary to support the delivery of the Government target of 300,000 homes by 2030.

ESB, is building a truly sustainable company by investing in smart networks, renewable energy and modernising the generation portfolio. ESB is implementing energy strategies that support the transition of Ireland to a low-carbon and ultimately post-carbon economy to become a competitive, resilient, and sustainable region. We request that due consideration is given to the issues raised in this submission, most particularly:

- Ensuring that the long-term operational requirements of existing utilities are protected. The importance of existing infrastructure and the level of operational activities ongoing at our high-voltage substations within County Wicklow are protected.
- A collaborative partnership between Wicklow County Council and ESB to proactively identify and secure appropriate sites for the development of essential energy infrastructure.
- ESB respectfully requests that due consideration is given to the need for critical upgrades and capacity enhancements across County Wicklow, as these are essential to address current grid constraints, support renewable energy integration, and enable sustainable residential and industrial growth
- Ensuring that public utilities are permissible under all zoning objectives is critical to enabling timely, efficient delivery of network capacity upgrades and supporting sustainable local growth and climate goals.
- Recognising the opportunities for early engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways and the provision of ducting/underground cabling.

#### **Opinion of the Chief Executive**

All of the points raised are noted.

The issues raised with respect to the capacity of services in Wicklow is a concern; it is assumed that such capacity issues have been flagged to the Minister and were taken into account in the development of the new housing figures. The CE is happy to support the ESB in all of their capacity enhancement programmes and in identifying suitable sites for the delivery of key electricity infrastructure. In addition, the need for engagement with ESB in relation to the design and delivery of new roads, public realm upgrades or the delivery of public greenways and the provision of ducting/underground cabling is recognised.

With regard to zoning, the Wicklow County Development Plan does not have a zoning 'matrix' and utility infrastructure is generally permissible in all zones.

#### **Chief Executive's Recommendation**

No change required to Proposed Variation

No.	Name	Link to submission
119	Department of Education & Youth	<a href="#">Department of Education and Youth</a>

### Issues Raised

In the context of future population trends and their potential impact on school place requirements, the department notes that this variation refers to the population growth identified for County Wicklow in the recent Wicklow County Development Plan 2022-2028. The department notes that the population scenario envisaged in Wicklow overall is the high NPF target of 164,000 by 2031. The department made its submissions to the CDP on the basis of the potential population growth within the county between 2022 and 2031. It is noted that the Census 2022 population for Wicklow County was 155,851, with a housing stock of 54,059. Housing completions in County Wicklow from Q2 2022 to Q3 2025, inclusive, was 4,950. This equates to a 9.2% increase in housing numbers over the 3.5 years. Allowing for the Census 2022 average of 2.84 persons per household in County Wicklow, the occupancy of these houses would be 14,058. Therefore, the population at the end of Q3 2025 is projected to be in the region of 170,000. This is in excess of the projected 2031 population target of 164,000.

This higher than projected population resulted in a higher demand for school places, which has had to be catered for in existing and new schools across the County.

In terms of future population growth in County Wicklow as proposed in this variation, the department notes that Table 3.5 Wicklow Core Strategy in variation 6 is being amended to include a new housing target from 2025 to 2031 of 17,908 for the County. The department notes that the target in table 3.1 for the same period is 14,476 but understands that the 17,908 target is based on the new housing target 2022-2031 as set out in Table 3.3 less the units already delivered from Q3 2022 to Q2 2025.

Allowing for the Census 2022 average of 2.84 persons per household in County Wicklow, these proposed 17,908 units could see a population increase of over 50,000 people within the listed settlements. When this figure is added to the current estimated population figure of circa 170,000, the projected population of County Wicklow could exceed 220,000 by the end of 2031.

The department further notes that the Table 3.1 Housing Targets for County Wicklow from Q1 2025 to Q4 2040 is 26,266 units. Therefore, the department has to be cognizant of the potential impact of future population growth beyond 2031.

Notwithstanding the fact that there is capacity for the development of c. 21,500 – 25,500 units under the provisions of the current County Development Plan and existing local plans as of Q3 2025, the above population figures, for the period 2025 to 2031 and 2031 to 2040, would see the demand for school places increase substantially and could place significant pressure on existing schools to cater for the extra school place requirement.

In terms of future school place provision, the department notes the following settlements identified in the Core Strategy Table of the Variation and would like to make the following observations on them. The department's preference would be to expand existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases. Therefore, the department requests the Planning Authority to examine the potential of protecting a land buffer around each school to enable them expand further if required.

### Bray

There are 20 schools (nine primary, eight post-primary (two of which are fee paying) and three special education schools) located in the Bray area.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 5,526 residential dwellings by 2031. If this target is achieved, it would see a potential future requirement for at least one additional primary school in Bray and the possibility of another subject to the projected population materialising, the age profile of that future population and other factors which influence school accommodation needs.

Allowing for further housing development identified beyond 2031, a potential requirement for this second additional primary school becomes a probability. This is something that will need further consideration at some future time. In the context of post primary provision, the projected growth figures could see a significant increase in post primary school place demand, some of this demand could be accommodated with the current capital projects and possible expansion of the existing facilities, if required.

### **Wicklow – Rathnew**

There are 10 schools (six primary and four post-primary schools) located within the Wicklow – Rathnew area. The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 3,170 residential dwellings by 2031. This is a sizeable increase of units on what was identified for the 2025 Wicklow-Rathnew LAP. In its submission to that plan, the department did not seek a reservation for a school site.

However, if the targets identified in this variation are achieved, it would see a potential future requirement for at least one additional primary school in Wicklow-Rathnew, subject to the projected population materialising, the age profile of that future population and other factors which influence school accommodation needs. Allowing for further housing development identified beyond 2031, a potential requirement for a second additional primary school will also need to be considered at some stage.

In the context of post primary provision, the projected growth figures could see a potential projected increase in school place requirements which could be met by the current capital projects and possible expansion of the existing facilities, if required.

### **Arklow**

There are 15 schools (five primary and four post-primary schools) located in Arklow.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 3,793 residential dwellings by 2031. This is a sizeable increase of units on the target identified for the draft Arklow Local Planning Framework 2025 for Variation 5 of the current Wicklow CDP. In its submission to that plan, the department did not seek a reservation for a school site but it did refer to section B:6.1 Education in the Framework Plan. In that section, it states *"It is considered that towards the end of the lifetime of the LPF the existing primary schools in Arklow may start to reach saturation if the 2031 population target is achieved. This would indicate that there will be a need for schools to either expand or a fifth primary school to be planned for and built"*. This statement clearly recognizes the potential need for a future school based on a housing target significantly less than the target in this variation. Therefore, if the targets identified in this variation are achieved, it would see a potential future requirement for at least one additional primary school in Arklow, subject to the projected population materialising, the age profile of that future population and other factors which influence school accommodation needs. Allowing for further housing development identified beyond 2031, a potential requirement for a second additional primary school will also need to be considered at some stage.

In the context of post primary provision, the projected growth figures could see a potential projected increase in school place requirements. Section B:6.1 Education of the Framework Plan states *"If growth in the settlement exceeds the 2031 target there will be a need to plan for a fifth post primary school in the settlement. In order to ensure that such a school can be planned for in the medium to long term, this LPF shall ensure that there is*

*appropriate zoned land to accommodate at least 1 new post primary school".* The targets in this variation will further increase the need for future post-primary school place provision.

The department would like to re-iterate its acknowledgement of the list of existing school sites and the proposed "community & education" zoned sites as identified in Table B:6.1. of the Local Planning Framework 2025.

### **Greystones – Delgany**

There are 11 schools (eight primary and three post-primary schools) located within the Greystones - Delgany area.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 1,717 residential dwellings by 2031. In respect of primary provision, the projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities, if required.

The projected growth figures could see an increase in post-primary school place demand which could be met by the current capital projects and possible expansion of the existing facilities, if required.

### **Blessington**

There are 6 schools (five primary and one post-primary school) located in Blessington.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 806 residential dwellings by 2031.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities, if required.

The projected growth figures could see an increase in post-primary school place demand which could be met by the current capital project and possible expansion of the existing facilities, if required.

### **Baltinglass**

There are 3 schools (two primary and one post-primary school) located in Baltinglass.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 170 residential dwellings by 2031.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities, if required.

The projected growth figures could see an increase in post-primary school place demand but it is currently expected that this extra requirement could be met by expansion of the existing facilities, if required.

### **Enniskerry**

There are two primary schools located in Enniskerry.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 418 residential dwellings by 2031.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities, if required.

### **Kilcoole**

There are 2 schools (one primary and one post-primary school) located in Kilcoole.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 878 residential dwellings by 2031. This is a sizeable increase of units on the target identified for the draft Greystones, Delgany and Kilcoole Local Planning Framework for Variation 4 of the current Wicklow CDP. In its submission to that variation, the department did not seek a reservation for a school site. However, if the targets identified in this variation are achieved, the possibility of a potential future requirement for a primary school will need to be considered.

The projected targets could see an increase in post-primary school place demand which could be met by the current capital project and possible expansion of the existing facilities, if required.

### **Newtownmountkennedy**

There are two primary schools located in Newtownmountkennedy.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 545 residential dwellings by 2031.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities, if required.

### **Rathdrum**

There are 4 schools (three primary and one post-primary school) located in Rathdrum.

The department notes that as per Table 3.5 Wicklow Core Strategy there is a target of an additional 190 residential dwellings by 2031.

In respect of primary provision, the projected growth figures could see an increase in primary school place demand which could be met by expansion of the existing facilities, if required.

The projected growth figures could see an increase in post-primary school place demand which could be met by the current capital project and possible expansion of the existing facilities, if required.

In terms of the identification of future school place requirements that necessitates the need for the reservation and acquisitions of sites for future new schools or the requirement of new sites to facilitate the relocation of existing schools, the department would like to highlight the following points.

It is generally considered that schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Further to this, other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities be complimentary to each other for the benefit of the whole community. It is the department's request that the site identified fits the criteria above and would be grateful if the Council could confirm if this is the case.

Further to this, all enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools. This infrastructure includes road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities. It should be noted that it is not within the remit of the Department of Education and Youth to develop or fund this enabling infrastructure.

In relation to other aspects of the draft plan, the department notes that the targeted growth in housing and population can be accommodated within the county's existing settlement boundaries and on land that is already serviced, or is serviceable, by infrastructure. Accordingly, the increase in housing as a result of the NPF Housing Growth Requirements will not require the zoning of new land or the extension of settlement boundaries in the Wicklow County Development Plan.

The department also anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation or space to meet this growing need. On a point of information, the Department of Education and Youth engages closely with the National Council for Special Education in relation to the forward planning of new special classes and additional special school places. The National Council for Special Education (NCSE) has a statutory function to plan and coordinate the provision of education and support services to children with special educational needs, in consultation with the relevant education partners and the Health Service Executive (HSE). This includes the establishment of special class and special school placements in various geographical areas where there is an identified need.

The department and the NCSE are working with schools and patrons to make increased provision for children with special education needs, both in special classes at mainstream schools and in special schools. At post primary level, all schools have been advised to plan for an average of 4 special classes per school. At primary level, the focus is on ensuring appropriate provision at all medium to large primary schools (8 mainstream classes or more) in the first instance. Most special classes are established in existing accommodation and where there is a further requirement within that accommodation, additional capacity can be catered for through the provision of extension facilities.

In recent years, the department has seen an increase in SEN school place requirement. Since 2019, 11 new special schools have been established, with five more due to be established for the 2025/26 school year. The continuing need for additional provision across the country, including in County Wicklow, is kept under constant review. In this regard, the department will consult with the Council if and when additional special education needs accommodation or sites for future special schools are required within specific locations. In the context of this variation and being mindful of a substantial population growth that may arise from the various future planned housing developments within its environs, the department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs.

In terms of assessing current and future capacity, the Department of Education and Youth has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location.

Finally, the department welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasizes the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose. It would be both essential and beneficial for the department to have further engagement with the Council in relation to the potential and significant additional school provision that may be required arising from the adoption of this variation as it is proposed

**Opinion of the Chief Executive**

All of the points raised are noted. The Council is committed to working with the Department to ensure that the Department is aware of all housing development strategies / targets for the County and individual settlements and providing the Department with regular updates with respect to new housing developments granted, and developments commenced, so that it can plan for the educational needs of new residents.

**Chief Executive's Recommendation**

No change required to Proposed Variation

## 4.2 Public Representatives

No.	Name	Link to submission
93	Senator Pat Casey	<a href="#">Patrick Casey</a>

### Issues Raised

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 30 dph to 48 dph. 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.

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 Coimisiun Pleanala to refuse planning on the old Heiton 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.

**The submission includes a detailed appendix of tables, calculations etc that would not be possible to summarise / insert here. The interested reader should read the full submission using the link above. It should be noted that the contents of the appendix are addressed in the response to follow.**

## Opinion of the Chief Executive

### General

The proposed revised housing growth targets are in accordance with the new Ministerial Guidelines. These guidelines and the rationale behind the new figures for Wicklow can be found here:

[https://assets.gov.ie/static/documents/S.28\\_Guidelines - NPF Implementation - Housing Growth Requirements.pdf](https://assets.gov.ie/static/documents/S.28_Guidelines_-_NPF_Implementation_-_Housing_Growth_Requirements.pdf)

The growth rate deemed suitable for each settlement / group of settlements is set out in proposed Table 3.3. The tables show, that taking the new targets as a minimum, there is existing zoned and serviced land in the short to medium term, but not the longer term, to meet the new targets. Therefore no additional land is proposed to be zoned via this Proposed Variation. However in order to meet the longer term needs, a process of identifying additional land has been commenced via the 'Call for Sites' and it is intended that these longer term needs will be address via a further variation or via integration into the next County Development Plan.

### Calculation of targets

The target for each individual settlement / group of settlement was calculated as follows:

- The appropriate % growth target for the 2022-2031 period for each settlement / groups of settlements was identified having regard to its characteristics and carrying capacity
- The number of new units required calculated based on the growth rate from the baseline of 2022
- The number of new units completed between 2022 and Q2 2025 deducted<sup>4</sup>
- The Q3 2025 – Q4 2031 unit targets determined
- This target was shown in Column 1 of Table 3.5
- Units under construction or permitted awaiting commencement were deducted from this target, to determine *further growth* needed in each settlement in order to meet the 2031 target.

The total cumulative target for the Q3 2025 to Q4 2031 is **17,908 units** (total of Column 1). It should be noted that this does not include the growth targets for levels 7-10 of the hierarchy (c. 112 units per annum)

The new County target for the Q1 2025-Q4 2031 from the Ministerial Guidelines period is **14,476 units**.

Therefore the growth target provided for in this Proposed Variation exceeds the target for Wicklow set out in the Ministerial Guidelines, **by c. 25%**.

Overall the total growth target is therefore approximately 25% above the 14,476 units set out in the Guidelines as the Council is keen to go **over and above** the minimum set out in the Guidelines and therefore a factor of c. 25% has been added.

#### **Headroom / additional provision**

For the purposes of the new Guidelines, planning authorities are requested to "*...address the scope for 'additional provision' of up to 50% in excess of the baseline housing growth requirement.*". As set out in the Guidelines, "*'additional provision' recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan*". This additional 'factor' of 50% clearly relates therefore to the **zoning** of more land over and above the minimum needed to meet a particular target. It is not a factor that is 'added' to the target (as suggested in this submission) but rather it is a factor that is added to the minimum amount of land needed to be zoned achieve a particular target.

The key purpose of this additional provision allowance is to allow for a supply of zoned land over and above that needed to meet the target in case that certain lands do not come forward within the lifetime of the plan, or certain lands when developed do not achieve the densities desired by the plan objectives and Ministerial density Guidelines.

Table 3.5 of the Proposed Variation identifies that there is a need for 234 ha of land to meet the revised housing targets, but that there is currently 401ha of zoned and serviced land in the County. This is a surplus or 'additional provision' of 70%. **Therefore the desired 50% is achieved and exceeded.**

There is no requirement for 'additional provision' of 50% to be added to the housing targets set out in the Minister's Guidelines and **then** a further 50% 'additional provision' of zoned land provided.

Nevertheless, in the preparation of the Proposed Variation, the CE was keen for it to be emphasised that it is a given that the new targets should be seen as a 'minimum' and as it can be seen from Table 3.5 of the Proposed Variation, it is proposed to provide for a housing growth target up to 2031 in the settlements of Wicklow of **c. 25% higher** than the 2031 target set by the Minister and it is also shown that the amount of land currently zoned provides for **c. 70% zoning headroom**.

<sup>4</sup> The data was not set out in the Proposed Variation, but was detailed in the CE Report issued to the elected members prior to the initiation of the Proposed Variation.

It should be further noted that this is a Proposed Variation to the current County Development Plan which applies up to 2028 only and any amendment proposed to the County Development Plan only requires to deal with the housing needs up to 2028. Nonetheless in order to provide for flexibility, a longer term horizon and the possibility of plan extension, the provisions of the Proposed Variation address needs up to 2031.

It is acknowledged in the Proposed Variation that the amount of currently zoned and serviced land will be unlikely to meet needs beyond 2031 and therefore the CE has committed to addressing this longer term need by initiating a process of identifying suitable land for additional residential zoning. A '**Call for Sites**' was commenced in December 2025 and submissions made will start to be evaluated in March 2026.

### **Increased targets & zoning**

It is not quite accurate to state that the housing targets for Wicklow have been increased by 76%. The current annual target in the adopted County Development Plan for the period of the plan (2022-2028) is 1,411 units per annum. The new target is 2,068 units per annum which is an increase by approx 47%.

As the current County Development Plan and LAPs include surplus provision of zoned land compared to the target at the time of the adoption of the plan in 2022, it has been demonstrated that the currently bank of zoned and serviced land (with no permission) has capacity for over 20,000 units, which would support the new target up to 2031 at least, **with more than 50% headroom / additional provision.**

While it is accepted that some of this zoned land has not come forward for development previously, the CE is confident that significant investment in infrastructure (such as the Arklow WWTP), the establishment of the National Housing Activation Office and the application of the Residential Zoned Land Tax, will result in significant development coming forward in the short to medium term.

Thereafter the '**Call for Sites**' process aims to identify whether there are any additional currently unzoned lands that are serviced / quickly serviceable that may be suitable in the immediate term for zoning and housing activation.

### **Densities**

It is not accepted that the density assumptions made are unrealistic or unviable. The density assumptions are consistent with Government policy on increased density as set out in '*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*' (DoHLGH 2024) which are already in force and already being implemented by both Wicklow County Council and An Coimisiun Pleanala.

The formats and densities of new development that are promoted cannot be left to the market alone to dictate as this will not deliver the range of house types and sizes needed by all in society and will not bring the best outcome for society in terms of investment in infrastructure, community development and environmental protection. As set out in the Guidelines:

*"The NPF priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out.*

*There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens.*

*Dispersed growth is also accelerating environmental degradation through loss of farmland and habitat and impacts on water quality. It creates a higher demand for new infrastructure and services in new communities that places a heavy financial burden on the State and results in a constant cycle of infrastructure catch-up."*

The current density objective for Bray is not 40dph as suggested and in fact it is explicitly set out in the current Bray MD LAP that densities of **not less than** 50dph will be required on lands zoned New Residential – High Density. The density proposed (and deemed acceptable by ACP) at the Heiton Buckley site in Bray was over 150dph. The permitted density at the Kilruddery Glen SHD on Bray Southern Cross was 73 dph. The density proposed at the Bray golf course development is c. 70dph.

In its evaluation of a recent application at Bray Fassaroe, the inspector commented '*As previously outlined, the Guidelines encourage densities at or above the mid density range at 'accessible locations'. Given that densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns, the mid-density range would be c. 100 dph. The proposed density of 68 dph would be significantly lower than the mid-density range and, accordingly, would not be consistent with the Guidelines. Similarly, I do not consider that it would be consistent with RPO 5.4 in the RSES which outlines that future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities as set out in the 'Sustainable Residential Development in Urban Areas'.*

The current density objective for Greystones-Delgany and Wicklow – Rathnew is not 30dph as suggested in this submission and in fact it is explicitly set out in the current County Development Plan that densities of not less than 50dph will be required on lands in such towns in locations where public transport access is available and 35-50dph in more suburban locations. For example, the density permitted Hawkin's Wood in Greystones was 50dph. The Wicklow Town – Rathnew LAP (adopted in 2025), sets out that density is to be determined in accordance with the Guidelines.

### **Enforcement of Core Strategy**

It is correct that a number of application for housing developments have been refused due to 'technical enforcement' of the current Core Strategy targets. The potential for this issue to arise was flagged to the Minister when the new housing targets were set for County Wicklow via the NPF / RSES for the 2022 County Development Plan. It is regrettable that this foreseen situation arose, but the Proposed Variation will remedy this situation and will allow in principle, all zoned and serviced land to be considered positively for permission, subject to normal proper planning and sustainable development criteria, with 'Core Strategy' targets being removed as a refusal reason.

### **Greystones targets**

The Greystones – Delgany(GD) target was developed having regard to the significant growth experienced in this settlement post 2016; in particular it factors in that Greystones-Delgany met its 2028 housing target set out in the 2022 County Development Plan by 2022. When one takes the growth rate from 2016, and factors in the new targeted growth up to 2031, the overall growth rate for the 2016-2031 period for Greystones-Delgany is c. 58%. This is comparable to the growth rates target over the same 2016-2031 period for Bray (c. 68%) and Blessington (c. 55%) and is therefore considered appropriate.

The housing growth targeted for Greystones-Delgany from 2016 to 2031 'is not less than 30%' which would require the delivery of approximately 2,465 housing units. This is stated in Table 3.3.

Having regard to the number of units that have been delivered since 2022 (up to Q3 2025) in GD, the target from 2025 onwards to 3031 is 1,717 units. This is stated in Table 3.5. In addition, 476 units are either currently under construction or are permitted and awaiting commencement.

In order to support the delivery of an additional 1,241 units, at an assumed average density of 50 dph, Table 3.5 states that 25ha of zoned and serviced land would be required. The table then goes on to state that there is already 45ha of zoned and serviced land available (with no permission) i.e. **an oversupply or headroom of 80%**.

The lands currently zoned in GD have been carefully considered to ensure the optimal spatial layout for the town including compact growth and environmental protection considerations.

As part of the '**Call for Sites**' exercise, a detailed assessment of capacity of GD to absorb more housing than provided by for current targets will be carried out.

## Appendix

Additional issues arising not addressed in the response above:

### Housing / zoning need:

While the detailed calculations are noted and CE commends the submitter for the work put into the exercise, the CE does not accept that the assumptions made to conclude that there is a significant shortfall in zoned land up to 2031 are robust and in compliance with Ministerial Guidelines.

The Proposed Variation does not suggest or 'bring forth' additional lands for zoning, as it is demonstrated in the tables set out in the Proposed Variation that there is zoned land in the short to medium term to accommodate the new housing targets. The Proposed Variation entails revisions to 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 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).

The Proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow; in particular it does not relate to the potential zoning of new lands for residential development or the extension of settlement boundaries, but rather it relates primarily to revising the housing targets for various settlements / areas within County Wicklow as set out in the Wicklow Core Strategy.

It is recognised in the Proposed Variation that there would not be adequate zoned and serviced lands in the County's settlements to meet the longer term housing targets beyond 2031. Wicklow County Council is committed to addressing this shortfall and in order to determine where there might be serviced / serviceable landholdings with interested owners, Wicklow County Council is separately running a '**Call For Sites**' consultation seeking expressions of interest from landowners for the future potential zoning of land for residential use and / or the extension of settlement boundaries.

As the public has very explicitly been advised that this variation process is not related to zoning, it is considered it would be inappropriate and unjust at this stage to change this variation into a re-zoning exercise as appear to be suggested by the OPR, as those members of the public that correctly did not make a submission to Variation 6 (but rather to the 'Call for Sites') but wish their land to be considered for zoning, would have been disenfranchised and excluded from proper consideration.

In addition, were this current variation to change approach and consider the zoning of new lands for residential use via the making of Material Amendments, the current process would require to be **paused** to allow for full SEA, AA and SFRA to be carried out which would require a number of months. The CE consider that this would not accord with the spirit of the Minister's Guidelines which seeks rapid action to unlock the development of zoned / serviced land in the immediate term, and this is exactly what the Proposed Variation as currently proposed would do, by removing any artificial Core Strategy 'targets' as a barrier and releasing Phase 2 lands immediately.

This two stage process is considered the most appropriate as it allows for a rapid amendment to the County Development Plan to allow already zoned and serviced land to come forward immediately by removing any policy blockages, while allowing for more careful consideration of new zoning requests to be carried out thereafter and consultation with the public and elected members

**Compliance with NPF:** The opinion expressed that the NPF objectives with respect to % of development to occur in built up areas i.e. that it may not be possible to achieve, is noted; however it is not considered open to the CE to circumvent or ignore national policy and put forward a higher portion of new growth in peripheral / greenfield locations than national policy would support. The focus for all settlements should remain the development of central areas, in a compact format, to make best use of existing infrastructure and promote active travel. Greenfield / peripheral development only, or mostly, is not optimal and will not deliver the national development goals set out in the NPF.

**Horizon:** The Proposed Variation is an amendment to the current County Development Plan which has a horizon up to 2031 only. It is agreed that a longer term horizon needs to be considered and it is intended that this will be done as part of the 'Call for Sites' process. This would however be a very significant exercise that would require inputs from a range of stakeholders and therefore cannot be 'rushed' or tacked onto the current Proposed Variation.

**County Development Plan extension:** The support for plan extension is noted; this would be a matter initially for the Minister.

**Net Density:** In the analysis presented in the Proposed Variation, 'net densities' have been used. In particular, in the statement of the amount of zoned and serviced land available for residential development in each settlement set out in Table 3.5, lands that would be required for the following uses have been discounted and are not include in the figure stated:

- Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.
- Lands used for commercial development (inc. retail, leisure and entertainment).
- Lands for primary schools, churches and other community services and facilities.
- Larger, Regional or District Parks, Wayleaves or rights of way.
- Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.

*(Source: Table 1 of Appendix B of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024)*

This was not detailed in the Proposed Variation, in the interests of legibility and understanding for the public, and in order to not have too many footnotes or caveats throughout the document. However this can be added if it better shows consistency with the guidelines.

**Growth in smaller settlements:** It is accepted that additional growth may be possible in some lower tier settlements (Level 5 and below) than would be provided by the 'targets' set out in Tables 3.3 and 3.5. However, it is not intended that any of the numbers set out in the Core Strategy tables moving forward will be used as limitations to development, and this is supported by proposed **Core Strategy Objective 1**.

The development of such lands, within the settlement boundary and according with the zoning / objectives for that settlement, subject to being possible to connect to all necessary services and adequate community infrastructure being available, would be supported by the Proposed Variation.

## Chief Executive's Recommendation

### Amend the Proposed Variation as follows:

#### Recommendation 1

#### Add the following sentence beside Table 3.5

*The new housing target for 2025-2031 as provided for County Wicklow by the new Guidelines for the 2025-2031 period is 14,476 units (Table 3.1).*

*Table 3.5 shows the new targets for the Level 1-6 settlements in the County as 17,908 units.*

*Therefore the new target 2025-2031 exceeds the Guidelines by c. 25%.*

#### Recommendation 2

#### Amend Table 3.5 as follows:

Table 3.5, add the following footnote to Column 8

*'This is the net amount of land required to accommodate the target number of residential units'*

Table 3.5, add the following footnote to Column 9

*'This is the net amount of zoned land available for residential development'; lands required for major road/streets, for commercial development (inc. retail, leisure and entertainment), for primary schools, churches and other community services and facilities, for larger, regional or district parks, wayleaves or rights of way and other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding have not been included in this figure'*

No.	Name	Link to submission
118	Deputy Fionntán Ó Súilleabháin	<a href="#">Fionntán Ó Súilleabháin TD</a>

### Issues Raised

We fully recognise the significant housing need in County Wicklow and support the delivery of new housing developments that provide an appropriate mix of private, affordable, and social units. However, it is essential that any increase in housing supply is matched by corresponding investment in critical infrastructure and services.

#### 1. Transport and Connectivity

There is growing concern that existing transport infrastructure in many towns and villages is not keeping pace with population growth. Arklow, in particular, requires additional housing, but current congestion levels—particularly when entering and exiting the town—are already at a standstill at peak times. Increasing population without addressing these issues will only worsen mobility and quality of life. We strongly urge that the following be prioritised:

- Measures to reduce M11 gridlock.
- Progress on reinstating/advancing the Arklow to Dublin rail line, as current public transport options are inadequate for a growing commuter population.
- Delivery of park-and-ride facilities and DART expansion to better integrate Wicklow towns with Dublin.
- Provision of a second bridge and a third exit for Arklow to alleviate traffic pressure on existing routes.

#### 2. Education Infrastructure

If housing numbers increase, there must be a parallel increase in school capacity. Additional school places—as well as investment in new or expanded school buildings—will be necessary to support a rising population.

#### 3. Rural and Regional Roads

Investment in rural road networks is essential, particularly: N81 safety improvements, which remain a long-standing and urgent need.

#### 4. Environmental Considerations

We also ask that all new development be approached with strong regard for environmental protection. Increased construction must be balanced with safeguarding local ecosystems, biodiversity, and overall environmental sustainability.

### Opinion of the Chief Executive

It is agreed that infrastructural investment will be required to support the proposed increased levels of housing development. All of the State infrastructure agencies are aware of the new County targets, and many have made submissions to this process which outlines where in the County the growth is to be accommodated in the short to medium term (up to 2031).

With regard to the specific issues raised:

## Transport and Connectivity

The concerns expressed with regard to the adequacy of transport infrastructure are noted.

The Council is committed to working with all local and state agencies to enhance transportation services in the County including (but not limited to): Transport Infrastructure Ireland with respect to the M/N11 and N81 (including park-and-ride projects), the National Transport Authority with respect to public transportation services and active travel infrastructure, Iarnród Éireann with respect to rail services and Dublin Bus / Bus Éireann with respect to bus services.

With respect to NTA funded Active Travel in particular, the budget allocation for 2026 for County Wicklow is €7m.

With respect to national roads, priorities for 2026 include:

- National Road Maintenance and Improvement; the following national road improvement schemes are currently progressing through the design and planning phases:
  - N11/M11 Bus Priority Interim Scheme
  - N11/M11 Strategic Bus Park & Ride (Junction 11 and Junction 16)
  - N81 Whitestown Lower Project and N81 Hangman's Bend and Tuckmill Project
  - M11 Strategic Bus Park & Ride (Junction 6)
  - N81 Rural Traffic Calming & Bus Stop at Hollywood
  - Road Safety Improvement Schemes (National Roads)
- Securing funding to progress the following schemes continues
  - N11/M11 Junction 4 to 14 Improvement Scheme
  - N81 Hollywood Cross to Tallaght Road Improvement Scheme

The Council will continue to invest in the improvement of transportation infrastructure within its own remit, in particular the improvement of regional and local roads, traffic management in towns, safety around schools etc. In this regard, the Council has allocated approx €33m of its 2026 budget to the roads and transportation function.

The Roads and Transportation programme for 2026 includes:

Non-national road maintenance and improvement including carriageways and footpaths, reconstruction or resurfacing and winter maintenance

- Road Safety Engineering Improvement (15 locations planned for 2026)
- Bridge maintenance
- Public lighting improvements and maintenance
- Car parking maintenance and management, including bye-law reviews where required
- Road Safety Promotion and Education
- Southern Port Access Road, Arklow
- Chapel Road Delgany Pedestrian & Cycle Infrastructure Scheme, Delgany
- Enniskerry Village Renewal – Public Realm Upgrades Phase III

The Wicklow County Development Plan sets out a clear policy platform to support the delivery of new infrastructure and services where needed and sets out numerous general and specific objectives with respect to infrastructural needs in the area. Wicklow County Council is committed to ensuring that new development is only permitted where the necessary infrastructure and services are or will be in place to service that development.

With respect to the suggestion regarding a third bridge in Arklow, the road objectives for Arklow set out in the Draft Arklow LPP aim to provide alternative routes for through traffic, in particular HGVs wishing to access the Roadstone Quarry and Arklow Port. The development of a Southern Port Access Route and associated upgrades to the existing supporting road network either end of the proposed SPAR route would serve to remove HGVs from the Town Centre and reduce overall traffic volume. This roads project, in conjunction with the objective for two new active travel bridges crossing the Avoca River, would further enhance the pedestrian / cycle environment of the Town Centre and enhance connectivity between the north and south of the town and most significantly providing a direct pedestrian connection between the Main Street and the Bridgewater Shopping Centre.

In the longer term it is an objective of the Draft LPP and the Draft LTP to investigate the feasibility of a second vehicular crossing point over the Avoca River between the Nineteen Arches Bridge and the M11. Further study will be needed to determine the need and optimal location for such a crossing including full feasibility and ecological studies, stakeholder engagement and traffic and transport assessments. Such studies will be progressed in the short to medium term.

### **Education Infrastructure**

The Department of Education & Youth is responsible for school delivery. The Council is committed to working with the Department to ensure that the Department is aware of all housing development strategies / targets for the County and individual settlements and providing the Department with regular updates with respect to new housing developments granted, and developments commenced, so that it can plan for the educational needs of new residents. The Department has made a submission with respect to the Proposed Variation which can be viewed here: [Department of Education and Youth](#)

Minister for Education and Youth Hildegard Naughton on 28 January 2026 announced the publication of the NDP Sectoral Plan for the Education and Youth sectors. The NDP Sectoral Investment Plan involves a capital investment of €7.55bn in schools and Youth Sector for the 2026 to 2030 period.

It is set out that this €7.55bn funding will be used as follows:

- €5 billion of NDP funding to support prioritised project rollout to provide additional capacity and modernisation of facilities with strong special education dimension to all projects
- €2.25 billion of NDP funding to focus on supporting the existing school estate in terms of maintenance, minor works and ICT grant funding, Climate Action Summer Works Scheme, other climate programmes and also increased capital funding for the Youth Sector.
- €0.3 billion to be used as a contingency fund for 2026 to 2030 period.

### **Environmental Considerations**

Environmental considerations are integrated into all decision making, in particular through the application of the wide range of environmental protection objectives set out in the Wicklow County Development Plan and subsidiary local plans. In addition, all plans are subject to SEA, AA and SFRA at the plan making stage, which ensures environmental considerations are taken into account at the earliest possible stage of development.

### **Chief Executive's Recommendation**

No change required to Proposed Variation

### 4.3 Public submissions

#### Topic 1 Housing Targets, Settlement Strategy

The submissions to follow all raised issues with respect to the new housing targets or the settlement / growth strategy. The submissions are grouped as follows:

- 'general' which means the submission is relating to the targets / settlement strategy generally in a non-specific location
- 'location' i.e. they raise issues with the target / strategy for a specific area / settlement (which are listed in order of the settlement hierarchy)

No.	Name	Subject	Issue raised
05	<a href="#">Greenleaf Homes Limited</a>	General	The submitter is supportive of the increase in population and housing targets proposed.
30	<a href="#">Nimol Holdings Limited</a>	General	The submitter is supportive of the increase in population and housing targets proposed.
51	<a href="#">Wicklow Planning Alliance</a>	General	<ul style="list-style-type: none"> <li>▪ The members of the WPA indicate they are satisfied that the draft amendment meets the requirements of Government directives to ensure sufficient land is zoned to facilitate a growth in housing units but raise a concern that measuring housing units rather than population may distort the relationship between population and infrastructure leading to further erosion of quality of life but they appreciate the constraints on the local authority to control these issues.</li> <li>▪ The submitters identify that previous over zoning going back to 2004 resulted sprawl and in a failure to consolidate growth in towns which could have had the potential to become centres of employment and led to the traffic congestion of car dependent settlements</li> <li>▪ They submit that the proposal to remove sequential zoning is not supported.</li> </ul>
64	<a href="#">Billy Timmins</a>	General	<p>1. It is suggested that proposed <b>Core Strategy Objective 1</b> be amended as follows:  <i>All lands zoned for residential use, or mixed use <del>of which residential use forms a component</del> where residential use is deemed suitable will be supported for the delivery of housing during the lifetime of the plan. ....</i></p> <p>In support of this request, reference is made to a particular site in Baltinglass zoned MU, with a specific objective for retail development which precludes residential use, with the retail use objectives no longer being necessary.</p> <p>2. It is suggested that proposed <b>Core Strategy Objective 2</b> be amended as follows:</p>

			<p>Wicklow County Council will proactively engage with developers of sites with planning permission <i>or zoning</i> for housing to support the commencement and delivery of permitted housing development <i>and potential permitted housing</i> and assist in the unblocking of impediments where feasible. <i>This may include recommending a variation to the relevant development plan.</i></p> <p>In support of this request, reference is made to the Baltinglass town plan, where it is put forward that OS zoning objectives are unintentionally affected housing development.</p>
75	<a href="#">Leddy Family</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ The submission queries how the 'additional' provision objective of the Guidelines has been applied and queries the calculation of zoned land needs in Table 3.5.</li> <li>▪ The submission requests that 50% additional provision be added onto the annual target</li> <li>▪ The submission queries the approach of deducting units already completed between 2022-2025, or units permitted / subject to JR</li> </ul>
79	<a href="#">Glenveagh Homes Ltd.</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ The submission requests that Wicklow County Council utilises and applies the full 50% '<i>additional provision</i>' set out in the Guidelines, as well as '<i>further additional provision</i>'.</li> <li>▪ The submission notes that Table 3.5 of the proposed variation allows for a housing target of 17,098 between 2025 and 2031, which equates to just under 3,000 units per annum but that this figure is reduced to c. 2,000 units per annum, through the exclusion of current dwellings under construction and extant permissions. It is put forward that the Council should not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction as these units do not provide additional residential capacity as they are historic permissions.</li> <li>▪ It is suggested that extant/permitted units should also not be included in the core strategy as a large number of them were likely permitted under previous Core Strategy and may not be constructed due to viability issues or other infrastructural constraints in delivery.</li> <li>▪ It is requested that Table 3.5 be adjusted to provide for a more realistic appraisal of deliverable housing, and in particular excluding 'Tier 2' lands. It is put forward that the assessment of the servicing status of lands in Bray is</li> </ul>

			<p>not robust and does not reflect the long term development / infrastructure needs of Fassaroe</p> <ul style="list-style-type: none"> <li>▪ It is suggested that a more realistic assessment of the likelihood of some lands coming forward for development be carried out and where lands are not likely to come forward, to consider zoning alternative lands, using the 'Call for Sites' to assist in identify more suitable lands.</li> <li>▪ It is suggested that more clarity is provided with respect to the terminology used in describing servicing status.</li> </ul>
84	<a href="#">Barbara Ogilvy Watson</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to provide 50% 'additional provision' over and above the housing growth requirement as directed by the Minister for Housing, Local Government &amp; Heritage and An Taoiseach to meet the needs of the population across county Wicklow. The additional provision should exclude the existing dwellings under construction and extant permissions.</li> <li>▪ This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to include Housing Allocations to 2034 and 2040 as set out in the NPF Implementation Guidelines to ensure a consistent and clear approach and enable appropriate phasing of additional residential zoned lands beyond 2031 to avoid restricting the supply of new housing development.</li> <li>▪ This submission requests that the Council does not reduce the Core Strategy figures for the remainder of the County Development Plan for dwellings which are already under construction and therefore do not provide additional residential capacity as they are historic permissions.</li> </ul>
88	<a href="#">Ballymore Group</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ While the submitter welcomes the revision of the housing targets in the Core Strategy they are disappointed to see that there is no corresponding proposal to zone more lands in any of the towns in the county to accommodate the proposed increase in housing numbers.</li> </ul>
90	<a href="#">Glenturas Construction Ltd &amp; Cluddale Ltd</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ While the Proposed Variation is welcomed by the submitter, it is submitted that the Proposed Variation has not provided for 50% additional provision as set out in the Ministerial Guidelines.</li> </ul>

92	<a href="#">Alan Richardson</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ It is put forward that the rationale for this proposed variation is due to inadequate planning for the future and based on out of date data going back to 2016.</li> <li>▪ It is suggested that this has meant that there was an artificial 'strait-jacket' placed on zoned building land, which has increased the price of developed land contributing to making the price of housing more expensive than it should be.</li> </ul>
96	<a href="#">Alan Richardson</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ It is submitted that the growth in population for the county has been projected to be far lower than the actual rate of increase - hence the inaccurate projections to 2040.</li> <li>▪ It is submitted that while the projection of new builds from 2025 to 2034 is at the rate of 2,068 per year, this falls away to 931 from 2035 to 2040 without any explanation and no mention is made of how the 150 homeless households are to be accommodated is included in this review.</li> </ul>
94	<a href="#">BBA Architecture</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ It is suggested that the population target for County Wicklow for 2031 should be in excess of 200,000, with housing target of 95,000 units.</li> <li>▪ In this regard it is suggested that all lands dezoned in the 2022 County Development Plan and currently being de-zoned in the Draft LPP for Arklow and Greystones be restored and that further lands be zoned for residential use</li> <li>▪ It is suggested that there are significant lands in Newtownmountkennedy and Greystones that are serviceable and capable of absorbing growth</li> <li>▪ It is suggested that population growth of 30% is too low for Greystones, which is on the DART and has new schools</li> <li>▪ It is suggested that the 50% headroom suggested by the Minister be applied to population figures</li> </ul>
98	<a href="#">David and Ida Kelly</a>	<b>General</b>	<p>The submission indicates support for the Proposed Variation, in particular:</p> <ul style="list-style-type: none"> <li>▪ the sentence <i>'The new housing targets are taken as minimum levels of housing to be supported by zoning / development objectives in the 2025-2031 period.'</i></li> <li>▪ Proposed Core Strategy Objective 1</li> </ul>
99	<a href="#">Dunmoy Properties Ltd</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ It is suggested that Variation No. 6 could be strengthened by incorporating a clearer mechanism to support the effective delivery of all lands zoned for residential use, including in particular a review of existing zoned lands, including consultation with</li> </ul>

			<p>landowners to determine the likelihood and viability of lands coming forward for development.</p> <ul style="list-style-type: none"> <li>▪ The submission includes an assessment of various land parcels in the County that they consider are unlikely to be developed in the short term – Fassaroe Bray, Doran's Pit Blessington, lands in Monastery Enniskerry, lands in Kilmacanogue, lands at Coolagad Greystones.</li> </ul>
109	<a href="#">Cairn Homes</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ This submission puts forward that the housing targets applied to the Variation do not appear to apply Policy and Objective 2 of NPF Implementation: Housing Growth Requirements' Guidelines - to provide for an 'additional provision' of up to 50% over and above the housing growth target set out in Appendix 1.</li> <li>▪ It is therefore submitted that the proposed Variation under-estimates and under-provides for the long term required housing and zoning needs of the county.</li> <li>▪ Their analysis points to a further growth requirement up to 2031 of 24,662 units instead of 12,054 units and additional zoned lands of the order of 453 ha instead of 234 ha</li> <li>▪ The submission queries how / whether to population uplift for Bray provided by the RSES has been taken into account in the revised targets</li> <li>▪ The submission suggests that population figures are provided as well as housing numbers</li> <li>▪ It is put forward that there an over-reliance on Bray and Arklow to deliver housing stock, which shows there is a need to re-balance housing growth to Greystones-Delgany and Kilcoole in particular.</li> </ul>
103	<a href="#">Seana Kevany</a>	<b>General</b>	<p>This submission puts forward that</p> <ul style="list-style-type: none"> <li>▪ The Proposed Variation No. 6 sets a binding housing quantum at Core Strategy level in advance of completed Local Planning Frameworks, including for Bray</li> <li>▪ This sequencing has the effect of fixing development pressure first, while deferring environmental, infrastructural, flood risk, and biodiversity resolution to later stages. In practice, this risks converting strategic housing targets into determinative factors in development management, rather than contextual ones.</li> <li>▪ This represents a substantive policy shift, not a neutral technical adjustment</li> </ul>
108	<a href="#">Craig Bishop</a>	<b>General</b>	<p>The submitter puts forward that:</p> <ul style="list-style-type: none"> <li>▪ These proposals respond to the Minister's demand for additional houses in Wicklow by allocating them to</li> </ul>

			<p>existing towns according to various criteria; what has been missed is not the fact that new houses are required but that Wicklow is the place to put them. It isn't.</p> <ul style="list-style-type: none"> <li>▪ The original SPGs concentrated on balancing growth with resources - taking a strategic planned approach for the good of the country not simply relying on 'the market' and developer led development. Since then, with the growing realisation that we face a climate emergency, the focus of spatial planning has changed. What's good for the country in the long term requires us to work within environmental limits.</li> <li>▪ Good spatial planning is based on the principle that 1. Housing growth should be focused on specific, densely populated, well serviced centres and 2. 'Growth' in the hinterland should be controlled in such a way that it allows life there to 'tick over'. Obsolescence replaced with sustainable, environmentally clean activities. Expansion and 'growth' restricted to the cities.</li> <li>▪ Dublin City has been allowed to expand its diameter beyond 60km. The wider it gets, the more difficult it is to service as diseconomies of scale impact. It is to counteract this imbalance that the NPF specifies that 50% of growth needs to be in the other cities. How that translates in the case of Wicklow is this: Allowing Dublin to expand even more is counterproductive. The environmental footprint of someone living in Ashford and driving to and from work is likely to be significantly higher than if they commuted to work from a densely populated, intensively resourced core of Dublin, closer to work.</li> <li>▪ The place to build Wicklow's next 20,000 houses is in Dublin. The next best place to build Wicklow's allocation is in Bray but only if you are prepared to invest in making it work, as in, build a modern new town with fast, frequent transit to Dublin and some of its suburbs.</li> <li>▪ The environmental cost of building outside this growth centre cannot be justified; not in Enniskerry, Kilcoole, Blessington or Greystones. Wicklow Town and Arklow were designated as growth centres but they work like satellites of Dublin. Until they too get a rapid transport service they should not receive any more houses.</li> </ul>
69	<a href="#">The Alliance of Bray Residents</a>	Bray	<ul style="list-style-type: none"> <li>▪ The Alliance puts forward that it supports action necessary to provide sufficient housing, given the severity of the current housing crisis. However it requests this be done in a sustainable manner that is not detrimental to the community of Bray, as part of the</li> </ul>

			solution to the chronic traffic problems of the town, and in a way that does not exacerbate the traffic problems.
88	<a href="#">Ballymore Group</a>	<b>Bray</b>	<ul style="list-style-type: none"> <li>▪ It is submitted that in order to achieve the targeted 6,299 additional units in Bray, approx 236ha of zoned land would be required, assuming density of 40 dph and additional provision of 50%.</li> <li>▪ The accuracy of some of the data with respect to planning permission under construction / granted / subject to JR in Bray is questioned</li> <li>▪ The accuracy of the statement of the amount of zoned land available in Bray is questioned, as is its capacity.</li> </ul>
100	<a href="#">Fassaroe Developments Ltd</a>	<b>Bray</b>	The submitter welcomes Proposed Variation and the updates to population and housing targets for Bray and environs
106	<a href="#">Avonvard Ltd</a>	<b>Bray</b>	<p>This submission requests the following:</p> <ol style="list-style-type: none"> <li>1) clearer articulation of how the revised housing growth figures have been derived for the County, including how the "additional provision" envisaged under Policy and Objective 2 of the Housing Growth Guidelines has been applied. It is suggested in this regard that WCC needs to allocate a minimum additional provision of c. 3,806 no. additional units to the settlements from that indicated in Table 3.5 of the Proposed Variation, including Bray.</li> <li>2) Allocation of Additional Growth to Bray – given its designation as a Key Town, its position on high-capacity public transport corridors, and its identification within the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region and the Dublin Metropolitan Spatial Plan (MASP)</li> <li>3) A review of the adequacy of existing zoned lands to cater for the Housing Growth Requirement figures with a particular focus on the likelihood that the lands identified for residential development within the plan will come forward for development within the remaining period of the plan.</li> <li>4) In light of the above, the submission includes a request for lands in their ownership at Vevay Road and Boghall Road in Bray currently zoned MU to be rezoned for all residential use.</li> </ol>
116	<a href="#">Alison Wildes</a>	<b>Bray</b>	<p>The submitter raises the following concerns with respect plans to increase housing development in Bray</p> <ul style="list-style-type: none"> <li>▪ Lack of adequate environmental assessment and updated local planning framework</li> <li>▪ Inadequate infrastructure</li> <li>▪ Inadequate public consultation</li> </ul>

			<p>The submitter puts forward that the future Bray LPF will determine where development should go, what infrastructure is required, and how environmental impacts will be managed. As this is still in preparation, it is suggested that the housing quantum being fixed at Core Strategy level, while place-based resolution is deferred to later stages, would tighten the policy context for future decisions and reduces flexibility at local level.</p> <p>In addition, it is suggested that by strengthening delivery-support language, the Proposed Variation increases the weight of housing targets in the planning balance and there is a real risk that these targets become determinative rather than contextual in future planning decisions.</p>
12	<a href="#">Eileen and Roy Byrne</a>	<b>Wicklow – Rathnew</b>	<p>The submitters request that the housing targets and zoning requirements for Wicklow Town – Rathnew be revised to allow for additional lands to be zoned for residential use. It is suggested that the variation should look beyond the 2031 horizon.</p>
65	<a href="#">Niall Melvin</a>	<b>Wicklow – Rathnew</b>	<ul style="list-style-type: none"> <li>▪ It is put forward in this submission that the calculation of zoning needs for Wicklow Town - Rathnew do not make sufficient provision for headroom allowance to reflect delivery risk, phasing uncertainty, or the likelihood that a proportion of zoned land will not deliver within the life of the plan. It is put forward that surplus between the baseline requirement and the extent of zoned land does not constitute planned headroom but it arises incidentally from the totality of existing zonings.</li> <li>▪ It is put forward that an assessment of which lands are realistically capable of delivery during the plan period and which may remain undeveloped or only partially developed has not been carried out.</li> <li>▪ While the submission notes that the assessment of serviceability refers primarily to water infrastructure, it is put forward that this does not take into account other factors affecting delivery such as land ownership / control, fragmentation and assembly constraints, access and transport limitations, surface water infrastructure requirements, sequencing and phasing considerations, and realistic market absorption rates. It is suggested that in the absence of such analysis, the presence of zoned and serviced hectares cannot reasonably be relied upon as assurance that sufficient housing will be delivered within the life of the plan.</li> <li>▪ It is requested that the Core Strategy should provide for additional residential zoning in Wicklow Town – Rathnew.</li> </ul>

79	<a href="#">Glenveagh Homes Ltd.</a>	<b>Wicklow – Rathnew</b>	<ul style="list-style-type: none"> <li>▪ It is requested that having regard to issues identified with the core strategy figures (summarised above) that Wicklow County Council allocates additional growth to Wicklow Town – Rathnew, where infrastructure is already in place (an addition 2,000 units)</li> <li>▪ It is suggested that extra allocation could be made available as a result of re-directing growth from locations such as Bray, where the zoned land should be categorized as '<i>further additional provision</i>' i.e. long term strategic land reserve.</li> <li>▪ It is further suggested that extra allocation for Wicklow Town – Rathnew should be made available by redirecting growth from Arklow, where it is put forward that the targets are unlikely to be delivered.</li> <li>▪ Additional text relating to infrastructure in Wicklow Town – Rathnew is suggested for Table 3.1.</li> </ul>
87	<a href="#">Crowley Residential</a>	<b>Wicklow – Rathnew</b>	<ul style="list-style-type: none"> <li>▪ It is put forward that 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.</li> <li>▪ Accordingly, it is suggested that the "surplus" identified for Wicklow Town – Rathnew 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.</li> <li>▪ 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.</li> <li>▪ Given these acknowledged constraints, it is suggested a more prudent Core Strategy approach—particularly in a Key Town—should include additional low-risk, serviced lands to ensure delivery certainty.</li> </ul>
90	<a href="#">Glenturas Construction Ltd &amp; Clouddale Ltd</a>	<b>Wicklow – Rathnew</b>	It is submitted that the revised Core Strategy should provide for additional housing growth for Wicklow Town – Rathnew, with a further uplift 50% beyond what is proposed in the Proposed Variation and in relation to same, it is put forward that additional land will be required to be zoned.
105	<a href="#">D/RES Properties and The Evans Family</a>	<b>Greystones-Delgany</b>	<p>This submission</p> <p>a. highlights the need to update the Core Strategy in response to the revised national housing targets assigned to County Wicklow, including the 50% additional provision</p>

			<p>envisaged under Policy &amp; Objective 2 of the Section 28 Ministerial Guidelines – Housing Growth Requirements;</p> <p>b. presents information on the Greystones-Delgany area; including (but not limited to) an assessment of population growth trends, the pattern of residential planning permissions, housing delivery rates, recorded achievable densities within the town, infrastructural capacity available, housing demand; and</p> <p>c. following from the above, submits that the target for GD should be increased and that their lands at Charlesland should be zoned for residential development</p>
99	<a href="#">Dunmoy Properties Ltd</a>	<b>Blessington</b>	<p>This submission includes an assessment of various land parcels in Blessington in order to show that notwithstanding the quantum of land currently zoned, the capacity of these lands to contribute meaningfully to housing delivery within the lifetime of the current LAP may be limited, and therefore there is a case for the zoning of alternative lands in Blessington (in their ownership)</p>
64	<a href="#">Billy Timmins</a>	<b>Baltinglass</b>	<p>It is submitted that the constraints in the wastewater treatment capacity in Baltinglass as detailed in Table 3.3 should not impact on aspirational growth figures.</p> <p>It is put forward that the growth figures for Baltinglass are not commensurate with other similar towns in its level in the hierarchy or with its role as a key hub in the southwest of the County. It is submitted that there is high demand for housing in the settlement.</p>
06 07 09 10 14 17 19 21 24 26 28 29 31 34 38 39 41 42 43	<a href="#">Dominique McMullan</a> <a href="#">Anne Marie Carew</a> <a href="#">Catherine Nolan</a> <a href="#">Annika Schmaedeke</a> <a href="#">Orla Swan</a> <a href="#">Neassa Sugrue</a> <a href="#">Alex Pigot</a> <a href="#">Catherine Nolan</a> <a href="#">Michelle Cronin</a> <a href="#">Friends _____ of Knocksink Woods</a> <a href="#">Tina Roche</a> <a href="#">Brian Donnelly</a> <a href="#">Lorna Kelly</a> <a href="#">Gill Toal</a> <a href="#">Sally Phelan</a> <a href="#">Catherine Nunes</a> <a href="#">Rosemary Riordan</a> <a href="#">Rosemary Riordan</a> <a href="#">Paula Cantillon</a>	<b>Enniskerry</b>	<p>The submissions listed raise some or all of the following concerns with respect to the increased housing target for Enniskerry:</p> <ul style="list-style-type: none"> <li>▪ Enniskerry should remain a 'small town' / 'small growth town'</li> <li>▪ Enniskerry should not be re-classified as a 'Key Town / Large Town' or 'Small / Medium Town'</li> <li>▪ The population of Enniskerry is big enough; the proposal to increase the housing target for Enniskerry is not appropriate given existing infrastructure deficits and characteristics of Enniskerry, particularly its visual and built / natural heritage assets; (see section to follow for expansion of the infrastructure submissions)</li> <li>▪ The proposal to increase housing development would be likely to adversely impact on natural heritage sites and important landscapes, including the Tufa Spring regime, (protected under EU Habitats Directive and Irish Law) in Knocksink Woods, Special Area of Conservation (SAC)</li> </ul>

44	<a href="#">Thomas Riordan</a>		<ul style="list-style-type: none"> <li>▪ The lack of employment in the town</li> <li>▪ Enniskerry is not well positioned with respect to the Metropolitan Area to absorb more growth</li> <li>▪ New housing does not support the local economy</li> <li>▪ Additional housing may negatively impact on the use of Enniskerry as a film location and for recreation; and on its role as a tourism destination and gateway to the Wicklow Mountains</li> <li>▪ Excessive new housing / overdevelopment damages community character and life / spirit</li> <li>▪ Alternative towns should be considered for additional housing</li> <li>▪ Some submissions suggest no further dwellings at scale should be built in the town and suggest that the development strategy for Enniskerry should be a strategy of 'enhanced protection' rather than intensified development</li> <li>▪ A number of submissions request the de-zoning of lands in Enniskerry, particularly at AA2 (Parknasilloge)</li> <li>▪ Support expressed for the building of new Local Authority housing, rather than private sector, is expressed in some submissions</li> <li>▪ Query raised with respect to inconsistency in zoning figures for Enniskerry in Tables 3.4 and 3.5; one table implies there is adequate zoned land and another suggest additional lands required to be zoned.</li> </ul> <p><b>Please note:</b> these submission bring up a wide range of issues with respect to Enniskerry. Only those issues which appear relevant to the Proposed Variation are summarised above (and in the sections to follow). Suggestions, for example, with respect to matters such tourism strategies, design or the record of protected structures while of course relevant to the town, are not related to the Proposed Variation itself, which relates primarily to housing targets. Any suggestions that would be more appropriately considered in the next overall review of the Enniskerry local plan will be carried forward to and considered in that process.</p>
45	<a href="#">Edwina and Dale Allman</a>		
46	<a href="#">James Barry</a>		
49	<a href="#">Enniskerry GAA Club</a>		
52	<a href="#">Malachy Quinn</a>		
53	<a href="#">Robert Neill</a>		
54	<a href="#">Joanne Coogan</a>		
55	<a href="#">Patricia Walker</a>		
59	<a href="#">Albert Smith</a>		
61	<a href="#">Dr. Graham McMullin</a>		
62	<a href="#">Caroline O'Callaghan</a>		
63	<a href="#">Zandra McMullin</a>		
66	<a href="#">Liz McMahon and Joe Wilson</a>		
67	<a href="#">Dave Casey</a>		
68	<a href="#">Richard Mayne</a>		
70	<a href="#">Aidan Harmon</a>		
72	<a href="#">Catherine O'Connor</a>		
76	<a href="#">Kilian Mullet</a>		
77	<a href="#">Ger Leonard</a>		
78	<a href="#">Nigel Pepper</a>		
80	<a href="#">Sorcha O'Keeffe</a>		
81	<a href="#">Carol Ann O'Keeffe</a>		
82	<a href="#">Patricia O'Keeffe</a>		
89	<a href="#">Brien Vahey</a>		
95	<a href="#">Brien Vahey</a>		
104	<a href="#">Sarah Leckie</a>		
107	<a href="#">Board of Eagle Valley Consolidated Management</a>		
111	<a href="#">Georgina Young</a>		
115	<a href="#">Rebecca Candon</a>		
75	<a href="#">Leddy Family</a>	<b>Enniskerry</b>	This submission puts forward that in order to fulfil its potential as a Self-Sustaining Town, Enniskerry requires significant population growth to support the delivery of services and amenities.
79	<a href="#">Glenveagh Homes Ltd.</a>	<b>Enniskerry</b>	Additional text relating to infrastructure in Enniskerry is suggested for Table 3.1.
102	<a href="#">Maguire Family</a>	<b>Enniskerry</b>	The submission puts forward that:

			<ul style="list-style-type: none"> <li>▪ Enniskerry is suitable for and has the capacity to absorb future growth in line with Government policy; there is wastewater, water supply and infrastructure in place to accommodate the additional growth set out in the Proposed Variation</li> <li>▪ The core strategy table removes the existing units under construction as they do not contribute towards future growth figures as they are effectively double counted from previous core strategy numbers.</li> <li>▪ WCC should review the amount of land zoned in Enniskerry and consider zoning additional lands (the submitters indicate that they have lands that should be considered)</li> </ul> <p>The submission queries the location of the 13ha stated as being zoned in Enniskerry.</p>
50	<a href="#">John Henry Prosser</a>	<b>Enniskerry – rural</b>	<p>The submitter puts forward that Proposed Variation No. 6 revises housing targets without explicitly addressing rural housing demand associated with Enniskerry's hinterland. The submitter suggests that rural clusters / rural areas should be utilised to provide more sites for housing, and 20% of the growth targeted for Enniskerry / for the wider Enniskerry area could be directed to such areas, and this could reduce pressure on the town. A number of new 'rural clusters' are suggested (Killegar, Ballybrew, Kilmolin, Annicrivey, Glaskenny, Curtlestown, Ballinagee, Barnamire, Cookstown).</p>
85	<a href="#">Greg Kavanagh</a>	<b>Kilcoole</b>	<ul style="list-style-type: none"> <li>▪ It is suggested that lands adjacent to rail services should be prioritised for new development</li> <li>▪ In this regard, it is put forward that Kilcoole is the only location in Wicklow with a substantial land bank between the town and the station (which is due to upgraded) and therefore the core strategy should take account of the opportunity to put more houses in Kilcoole.</li> </ul>
101	<a href="#">Brookhampton Limited</a>	<b>Kilcoole</b>	<ul style="list-style-type: none"> <li>▪ This submission requests (i) clearer articulation of the baseline requirement and the quantum of additional provision applied, (ii) correct any inconsistencies in the tables, and (iii) provide clarification on methodology underpinning the Phase 1 / Phase 2 capacity split.</li> <li>▪ It is suggested that WCC would need to allocate an additional c. 3,806 no. units to the settlements from that indicated in Table 3.5 of the Proposed Variation.</li> <li>▪ The submission requests the allocation of additional growth to Kilcoole (c. 187 additional units) and in addition, that Kilcoole's current status in the settlement</li> </ul>

			<p>hierarchy be reconsidered and moved up to a Level 3 town. It is put forward that given the planned housing growth for Kilcoole, the suggested reclassification of Kilcoole as a Level 3 (Self-Sustaining Growth Town) would more accurately reflect its evolving population growth trend, its functional role within the regional settlement network, and its capacity to support and sustain future growth consistent with the objectives of the County Development Plan.</p> <ul style="list-style-type: none"> <li>▪ It is suggested that all lands that are suitable, serviced and available for housing delivery should be identified for residential development under the proposed variation and the Proposed Variation should include land use zoning maps identifying the areas where additional growth can be delivered.</li> <li>▪ In relation to the above, it is put forward that additional land in their ownership in Kilcoole should be zoned.</li> </ul>
71	<a href="#">Dwyer Nolan Developments Ltd</a>	<b>Newtownmountkennedy</b>	<ul style="list-style-type: none"> <li>▪ This submission request that the Core Strategy targets for Newtownmountkennedy be amended (increased) and take into consideration particular lands owned by the submitter in Newtownmountkennedy</li> <li>▪ The submitter draws attention to an apparent discrepancy in the figures for Newtownmountkennedy in Tables 3.3, 3.4 and 3.5 and suggest there is a shortfall in the targets / zoning provisions.</li> </ul>
84	<a href="#">Barbara Ogilvy Watson</a>	<b>Newtownmountkennedy</b>	<ul style="list-style-type: none"> <li>▪ This submission requests that the Core Strategy Table 3.5 in the proposed Variation No. 6 to the Wicklow County Development Plan 2022 – 2028 be amended to include the 50% 'additional provision' in housing allocations in Newtownmountkennedy at a minimum. It is requested that a minimum of 818 units are assigned to Newtownmountkennedy as the 'New Housing Target 2025-2031' in the period to 2022 - 2031 and an additional 540 units to 2034. It is requested that the Council does not reduce the core strategy figures for the remainder of the CDP for dwellings which are already under construction (366 no.) and therefore do not provide additional residential capacity as they are historic permissions.</li> <li>▪ It is put forward in this submission that to realise the future growth requirements there needs to be a significant pivot in the short term in terms of strategy away from the long term strategic land banks to the smaller/medium sized sequentially serviced landbanks within towns such as Newtownmountkennedy and the</li> </ul>

			<p>submitters lands, particularly where there is an active developer partner willing to bring the site forward for development in the short-term, subject to an appropriate zoning context.</p> <ul style="list-style-type: none"> <li>▪ It is put forward that this growth rate targeted for Newtownmountkennedy is not commensurate with the population growth which the town has experienced in recent years and should be revised to reflect the rapid growth of the town and its anticipated growth in future given the town's location and ability to accommodate additional housing to serve the northern part of the county.</li> <li>▪ It is suggested that extra allocation could be made available as a result of re-directing growth from locations such as Bray, where delivery is likely to be much longer term.</li> </ul>
112 117	<a href="#">Shane Stokes</a> <a href="#">Shane Stokes</a>	<b>Newtownmountkennedy</b>	The submission welcomes the statement that land zoned in Newtownmountkennedy is sufficient to meet the increase housing targets
114	<a href="#">Paul and Grace Kavanagh</a>	<b>Newtownmountkennedy</b>	While not explicitly clear, this submission appears to be raising concerns with respect to the proposed new targets for Newtownmountkennedy in the sense that they are not adequate given a number of projects the submitters have in train for more the 50 units (5 units on Main Street, 15 units at Season Park Farm and 35-55 units at Mount Kennedy)
56	<a href="#">Graham Kennedy</a>	<b>Kilcoole / Newtownmountkennedy – rural</b>	This submission request that clusters of rural housing in the area between Kilcoole and Newtownmountkennedy, which have become serviced by mains water / wastewater infrastructure be identified as suitable for further housing development in accordance with the 'Level 8' objectives; a new specific objective for this situation (i.e. rural unserved areas becoming serviced) is suggested in the submission. It is put forward that this change would unlock a small to medium number of sites without the need for the zoning of new greenfield land.
11	<a href="#">Kismet Limited</a>	<b>Rathdrum</b>	The submitter requests that the housing targets and zoning requirements for Rathdrum be revised to allow for additional lands to be zoned for residential use. The submitter puts forward that Table 3.5 underestimates the amount of land required to be zoned in Rathdrum to meet the housing target up to 2031.
16	<a href="#">Ashford GAA Club</a>	<b>Ashford</b>	The submitters suggest that Ashford be de-coupled from the Level 5 group in terms of expressing the population growth targets given the level of growth experienced in the

			<p>town since 2016. It is suggested that this would allow for better monitoring of the housing growth in the town.</p> <p>It is requested that having regard to the significant growth that has taken place in Ashford over the last few years, the new growth rate for Ashford should not be increased in line with other Level 5 settlements; that it should be reduced to acknowledge the significant growth that has already taken place, with only infill growth permitted in the foreseeable future. It is suggested that this is important to allow for the provision of social infrastructure (including sports pitches) to catch up with the significant population / housing increases that have taken place already.</p>
86	<a href="#">Ardale Property Group</a>	<b>Newcastle</b>	<ul style="list-style-type: none"> <li>▪ It is put forward in this submission that the needs of Newcastle are not best served by the application of a cumulative growth rate across all Level 6 settlements; the Variation does not provide clarity as to how this target is to be apportioned between individual settlements, including Newcastle.</li> <li>▪ It is suggested that the cumulative approach lacks transparency and fails to provide settlement-specific clarity, which is fundamental to effective development management and long-term planning.</li> <li>▪ It is suggested that Newcastle has distinct characteristics, development pressures, and service needs that differ from the other five Level 6 settlements within the County and therefore treating growth as a shared or cumulative allowance across Level 6 settlements risks obscuring these needs and undermines the ability to plan positively and proactively for the future of the settlement.</li> <li>▪ It is put forward that in the absence of a defined, settlement-specific growth allocation, there is a lack of certainty for landowners, developers and the local community, which is contrary to the objectives of proper planning and sustainable development.</li> <li>▪ The submission questions the rationale for the application of a 20% growth rate to Level 6 settlements, as opposed to a growth rate in excess of 30%; it is suggested that the growth rate provided lacks sufficient explanation or supporting evidence; that in the absence of a clear and robust justification, this lower growth threshold appears overly restrictive and may not adequately reflect local housing need or the capacity of certain settlements, including Newcastle, to accommodate sustainable growth.</li> </ul>

94	<a href="#">BBA Architecture</a>	<b>Rural Towns / Villages / Areas</b>	It is suggested that all villages and smaller towns contribute to population growth in the County to assist in the sustainability of schools and sports clubs etc
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### Opinion of the Chief Executive

#### General

The proposed revised housing growth targets are in accordance with the new Ministerial Guidelines. These guidelines and the rationale behind the new figures for Wicklow can be found here:

[https://assets.gov.ie/static/documents/S.28\\_Guidelines - NPF Implementation - Housing Growth Requirements.pdf](https://assets.gov.ie/static/documents/S.28_Guidelines_-_NPF_Implementation_-_Housing_Growth_Requirements.pdf)

It is taken that the new targets supersede all previous targets or allocations, including the previous additional allocation to Bray made by the RSES.

The growth rate deemed suitable for each settlement / group of settlements is set out in proposed Table 3.3. The tables show, that taking the new targets as a minimum, there is zoned and serviced land in the short to medium term, but not the longer term, to meet the new targets. Therefore no additional land is proposed to be zoned via this Proposed Variation. However in order to meet the longer term needs, a process of identifying additional land has been commenced via the '**Call for Sites**' and it is intended that these longer term needs will be addressed via a further variation or via integration into the next County Development Plan.

The updated targets have been expressed as unit numbers throughout the Proposed Variation, rather than population numbers, as this is the format that the new targets are presented in the Guidelines.

The assessment of servicing status has been carefully considered, utilising inputs for all state agencies and infrastructure departments of the Council. With respect to the assessment of 'serviceability', the CE is satisfied that identifying water services as the primary potential constraint is an appropriate approach, and that other issues affecting delivery such as site assembly, transportation infrastructure and surface water infrastructure requirements are not necessarily insurmountable development impediments in the majority of locations / sites. These are certainly matters that require attention and planning, and are for the most part evaluated and teased out during the local plan making process, before lands are zoned for significant or strategic development.

#### Zoning horizon

The Proposed Variation is an amendment to the current County Development Plan which extends to 2028 only with a longer term horizon up to 2031. It is agreed that the longer term horizon will need to be considered and it is intended that this will be done as part of the '**Call for Sites**' process. This would however be a very significant exercise that would require inputs from a range of stakeholders and therefore cannot be 'rushed' or tacked onto the current Proposed Variation.

#### Headroom / additional provision

For the purposes of the new Guidelines, planning authorities are requested to "*....address the scope for 'additional provision' of up to 50% in excess of the baseline housing growth requirement..*". As set out in the Guidelines, "*'additional provision' recognises the fact that, for a variety of reasons, a relatively significant proportion of zoned lands are not activated over the period of a development plan*". This additional 'factor' of 50% clearly relates therefore to the zoning of more land over and above the minimum needed to meet a particular target. It is not a factor that is 'added' to the target but rather it is a factor that is added to the minimum amount of land needed to be zoned to achieve a particular target.

The key purpose of this additional provision allowance is to allow for a supply of zoned land over and above that needed to meet the target in case that certain lands do not come forward within the lifetime of the plan, or certain lands when developed do not achieve the densities desired by the plan objectives and Ministerial density Guidelines.

Table 3.5 of the Proposed Variation identifies that there is a need for 234 ha of land to meet the revised housing targets, but that there is currently 401ha of zoned and serviced land in the County. This is a surplus or 'additional provision' of 70%. **Therefore the desired 50% is achieved and exceeded.**

There is no requirement for 'additional provision' of 50% to be added to the housing targets set out in the Minister's Guidelines and then a further 50% 'additional provision' of zoned land provided.

Nevertheless, in the preparation of the Proposed Variation, the CE was keen for it to be emphasised that it is a given that the new targets should be seen as a 'minimum' and as it can be seen from Table 3.5 of the Proposed Variation, it is proposed to provide for a housing growth target up to 2031 in the settlements of Wicklow of c. 25% higher than the 2031 target set by the Minister and it is also shown that the amount of land currently zoned provides for c. 70% zoning headroom.

It should be further noted that this is a Proposed Variation to the current County Development Plan which applies up to 2028 only and any amendment proposed to the County Development Plan only requires to deal with the housing needs up to 2028. Nonetheless in order to provide for flexibility, a longer term horizon and the possibility of plan extension, the provisions of the Proposed Variation address needs up to 2031.

It is acknowledged in the Proposed Variation that the amount of currently zoned and serviced land will be unlikely to meet needs beyond 2031 and therefore the CE has committed to addressing this longer term need by initiating a process of identifying suitable land for additional residential zoning. A '**Call for Sites**' was commenced in December 2025 and submissions made will start to be evaluated in March 2026.

#### **'Further additional provision'**

The current Proposed Variation has only considered lands that are currently serviced or serviceable within the horizon of the variation.

The Ministerial Guidelines state:

*"Lands which offer the potential to meet the objectives of these Guidelines but are not serviced or serviceable during the lifetime of the current adopted development plan, may be identified as 'Long-Term Strategic and Sustainable Development Sites/Opportunity Areas' in order to give clear strategic direction to future development locations, in consultation with infrastructure providers. The residential development capacity associated with the parts of these sites/areas that are not likely to come forward for development within the period of the current adopted plan may be considered as further 'additional provision' over and above the baseline housing growth requirements and the up to 50% 'additional provision' referenced above.*

*"The identification of Long-Term Strategic and Sustainable Development Sites/Opportunity Areas should be focused on the five cities and Metropolitan Area Strategic Plan areas, designated Regional Growth Centres, and designated Key Growth Centres."*

The CE is committed to determining via the '**Call For Sites**' and the next County Development Plan review process if there are additional lands, currently unserved / unserviceable within the horizon of the variation and therefore not considered in this process, that could be identified as a long term strategic land reserve in the Metropolitan Area settlements and designated Key Growth Centres.

#### **Calculation of targets**

The target for each individual settlement / group of settlement was calculated as follows:

- The appropriate % growth target for the 2022-2031 period for each settlement / groups of settlements was identified having regard to its characteristics and carrying capacity
- The number of new units required calculated based on the growth rate from the baseline of 2022
- The number of new units completed between 2022 and Q2 2025 deducted<sup>5</sup>
- The Q3 2025 – Q4 2031 unit targets determined
- This target was shown in Column 1 of Table 3.5
- Units under construction or permitted awaiting commencement were deducted from this target, to determine *further growth* needed in each settlement in order to meet the 2031 target.

The total cumulative target for the Q3 2025 to Q4 2031 is 17,908 units (total of Column 1). It should be noted that this does not include the growth targets for levels 7-10 of the hierarchy.

The new County target for the Q1 2025-Q4 2031 period is 14,476.

Therefore the growth target provided for in this Proposed Variation exceeds the target for Wicklow set out in the Ministerial Guidelines, by c. 25%.

The Guidelines provide for a housing unit growth target from the year 2025 onwards. The units target provided in the Guidelines is not 'in addition' to the existing target in the County Development Plan – they are new targets, replacing the current targets. They do not state that units delivered in 2025 or 2026/2027 (e.g. units currently under construction) do not or should contribute to this target.

With respect to the '*units permitted and yet to be commenced*' and '*units permitted but subject to current appeal / judicial review*' it is not assumed that these units will definitely be delivered; however, it is assumed that the land occupied by these permissions has the development capacity of at least the permission already granted (number of units permitted by WCC/ACP). In many cases, if the extant permission is not taken up, a further new permission would likely generate a higher number of units given change in density objectives. The land occupied by these permissions was not included in the column titled '*Amount of zoned and serviced land available up to 2031 (ha)*'.

## Core Strategy Objectives

### Core Strategy Objective 1

It is proposed to remove the distinction between residential phase 1 and phase 2 zoning as part of this Proposed Variation. This is considered reasonable as such lands have already been deemed suitable in principle for residential zoning, have been subject to all environmental assessment such as SEA, AA and SFRA and have been through a public consultation and adoption process. The 'releasing' of these lands now is the optimal method to ensure that the increased housing targets can start to be met **in the immediate term**.

If it assists to add clarity, the CE confirms that applications for new housing are assessed on case-by-case basis on their own merits, against a range of development objectives and standards set out in the County Development Plan, and the proposed new CS1 objective will allow all residentially zoned sites, whether they be designated 'P1' or 'P2' to be assessed against all of these requirements on an equal footing.

In the context of the Government's stated urgent need to increase housing delivery, it is also clarified that proposed new CS Objective 1 will supersede<sup>6</sup> the following objectives in local plans (which will be highlighted as a 'change consequent' to the making of this variation):

<sup>5</sup> The data was not set out in the Proposed Variation, but was detailed in the CE Report issued to the elected members prior to the initiation of the Proposed Variation.

<sup>6</sup> Section 18(4) (b) of the PDA 2000 - A local area plan may remain in force in accordance with *paragraph (a)* notwithstanding the variation of a development plan or the making of a new development plan affecting the area to which the local area plan

**Wicklow Town – Rathnew LAP: WTR4**

*Notwithstanding the zoning / designation of land for new residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:*

- *75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.*

**Blessington LAP: BLESS7**

*Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following two conditions are satisfied:*

- *75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated) or after 3 years following adoption of the LAP, less than 50% of the RN1 lands have been activated;*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.*

**Greystones-Delgany and Kilcoole LPF :GDK16**

*Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following conditions are satisfied:*

- *At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.*

**Core Strategy Objective 2**

The Proposed Variation proposes an objective supporting engagement with landowners of land with planning permission, to determine if the Council can provide support to activate the lands. With respect to existing zoned lands without live permission, the Planning Authority is available to engage in pre-planning discussions to progress housing projects on such lands. It is not considered appropriate to indicate that changes in zoning would be used as an activation measure for zoned housing land. It is not considered necessary to amend CS Objective 2 therefore in these regards.

**Mixed use zones**

Where mixed use zoned land is deemed suitable for residential use, this is stated in the relevant plan in which it is zoned. There are some 'mixed use' zones where residential use is suitable; there are some where it is not. While submission 64 relates specifically to particular site in Baltinglass, the suggested wording change would mean any land zoned MU, even where residential use has not been deemed suitable through the plan making process for that land, should now be deemed suitable through a wording change to the County Development Plan.

This is not considered appropriate as such a change would change the status of all MU land in the County, and would completely undermine the normal and statutory plan-making / zoning process, which entails environmental assessment, public consultation and an adoption process. It is considered that such a request would be more appropriately considered in the next review of the County Development Plan. Alternatively, a request for a change in zoning can be made through the concurrent 'Call for Sites' process.

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relates except that, where any provision of a local area plan conflicts with the provisions of the development plan as varied or the new development plan, the provision of the local area plan shall cease to have any effect.

## Rural / Villages

Housing growth has been identified for all tiers in the settlement hierarchy in the Wicklow Core Strategy, including smaller towns, villages, rural clusters and in the rural area. Housing growth of c. 1,115 units in the Level 7-10 areas are detailed in Table 3.3. This level of growth is considered reasonable and appropriate given the lack of services that existing in the majority of these settlements / areas, which generally make them unsuitable for development other than small scale development and that generated by local needs. The existing development policy and objectives for these areas in the Wicklow County Development Plan already support appropriate development in these locations.

The suggestion that additional housing be targeted at such rural areas would not be in accordance with national or County policy, or with sustainable development principles, as residential development at such locations is generally distant from services, car dependent, risks pollution of ground water due to dependence on on-site wastewater system and impacts on the natural environment of rural areas. The most sustainable strategy for future housing development is to direct same into existing settlements where services are already present or can be most effectively delivered / improved.

With respect to the suggestion for new rural clusters, this can be more appropriately reviewed and considered via the next review of the Wicklow County Development Plan, where this issue can be addressed holistically across the entire County and not just for the Enniskerry area.

With respect to the suggestion for amending or relaxing the rural housing policies for historic rural clusters between Kilcoole and Newtownmountkennedy, for the most part while some locations in this area have been possible to connect to water services via the mains services that have been developed between Kilcoole and Newtownmountkennedy on the Woodstock Road, this area is otherwise poorly serviced with respect to roads and transportation infrastructure (no public transports services, narrow roads, no footpaths / cycleways) and would not be suitable for promotion for additional housing that is not related to local needs, at this time. As above, this issue could be more appropriately reviewed and considered via the next review of the Wicklow County Development Plan, where this issue can be addressed holistically across the entire County and not just for the Kilcoole – Newtownmountkennedy area.

## Bray

Wicklow County Council is committed to supporting significant new residential development in Bray, our highest tier town, in the immediate, short and medium term. This requires to be accompanied by a suitable quantum of other uses, including employment, community use, open space etc.

With respect to the suggestion that the delivery of 6,299 units in Bray would require the zoning of c. 236ha of land is rejected by the CE as this is based on an average density across the town of only 40 dph, which would be completely contrary to the current County Development Plan, the Density Guidelines and the character / capacity of Bray. The current density objective for Bray as set out in the Bray MD LAP is '*not less than 50/ha*' on lands zoned New Residential – High Density, and no density limit specified for town centre / opportunity sites / infill. For the purpose of this variation, an average density of 75 dph has been assumed for Bray. For example, the density proposed (and deemed acceptable by ACP) at the Heiton Buckley site in Bray was over 150 dph. The permitted density at the Kilruddery Glen SHD on Bray Southern Cross was 73 dph. The density proposed at the Bray golf course development is c. 70 dph.

With respect to the accuracy of data regarding developments under way / granted yet to commence / subject to JR, the data was collected at a point in time (end of Q3 2025) and without the benefit of a national or county data management 'system' that allow for collection of said information, particular real time data on commencement and completions on any given site. It is accepted that there may be some small discrepancies but where for example a development has started in the intervening period or it's start was not encompassed by the 'development under construction' total, said development would be captured via the 'development permitted yet to commence' column. Overall therefore the CE is satisfied that the data utilised was the best available. Specifically with regard to the number of units subject to JR in Bray, the figure included in Table 3.5 of 135 related only to the 'Heiton Buckley' site, which JR is now decided. The additional 190 units which are indicated in the Ballymore submission as also being subject to JR, located on the Bray golf club lands,

and are encompassed by the figure 'units permitted yet to be commenced' as a further permission was granted on the same lands as the lands that were the subject of the JR.

With respect to the identification and quantification of undeveloped zoned land in Bray, the CE is satisfied that this is accurate and was conducted using GIS mapping. In terms of estimating the capacity of said lands, this exercise was conducted using appropriate assumptions about density, including reductions for non-residential use on mixed use lands and the CE is satisfied of the general accuracy of the data presented (for more detail with respect to density, please see 'Topic 2' to follow).

With respect to Fassaroe, lands at Fassaroe have been zoned for residential development since 2008 and since that date, significant effort and investment has been made to bring the development of these lands to fruition. Unfortunately these efforts have been stymied by concerns regarding the impacts of the development of these lands on the N/M11. In order to address these concerns, in 2019 the NTA prepared a Transport Study for the area, in conjunction with WCC, DLRCC and the TII, which identified the infrastructural interventions that would be required for Fassaroe's delivery, including a phasing programme. Regrettably this phasing programme has also now become a barrier to the development strategy for the area, is considered outdated due to the passage of time, changes in the National Development Plan programme (particular as it relates to investment in the M/N11) and the significant changes in Government policy in particular with respect to activation of zoned housing land, and therefore requires reconsideration.

Concerted effort is now required from all stakeholders and agencies to get these lands activated. The CE is committed to the preparation of an Infrastructure Planning and Delivery Strategy for the Fassaroe lands, working together with Dún Laoghaire-Rathdown County Council, relevant infrastructure agencies including Transport Infrastructure Ireland, the National Transport Authority, and landowners, and the CE is hopeful that the Housing Activation Office will, lead on this and will use its powers to intervene to support immediate development and remove policy or infrastructure impediments. These lands have already been brought to the attention of the HAO.

The majority of the lands zoned in Fassaroe are owned by developers who are very keen to move ahead in the immediate term (i.e. applications in 2026) with development (in the order of 3,000+ units), and therefore the suggestion in one submission that lands at Fassaroe should be 'downgraded' to a 'long term strategic land reserve' is not supported.

It is acknowledged in the Proposed Variation that the amount of currently zoned and serviced land in the County may not be adequate to meet longer term requirements beyond 2031. This will be considered and addressed after this Variation process is complete, and will take into account submissions made in the 'Call for Sites' process which will assist in identifying where there are interested landowners, ready to come forward with development, as well as the capacity of infrastructure in any particular location.

The issues raised with respect to local transportation issues are addressed under 'Topic 3' of this section

### **Wicklow Town – Rathnew**

Having regard to Wicklow Town – Rathnew's place in the settlement hierarchy as a 'Key Town' and its characteristics, a very high growth rate of 60% is proposed between 2022 and 2031. This is a significant uplift from the current growth strategy which is a growth rate of 44% between 2016 and 2031.

This would require the delivery of c. 3,739 units in the 2022-2031 period. Having regard to units completed since 2022, the outstanding target is 3,170 units. There are 502 units under construction and permission granted for another 639 units (yet to commenced) as of Q3 2025. Therefore a further 2,029 units are required. This would require c. 41ha of zoned and serviced land, whereas at this time there is c. 59ha of zoned and serviced land available without permission i.e. a surplus of 18ha or headroom of 44%. Therefore having regard to the target up to 2031 as expressed in the Proposed Variation, there is no significant shortfall of zoned land.

It is acknowledged in the Proposed Variation that the amount of currently zoned and serviced land in the County may not be adequate to meet longer term requirements beyond 2031. This will be considered and addressed after this Variation process is complete, and will take into account submissions made in the 'Call for Sites' process which will assist in identifying where there are interested landowners, ready to come forward with development, as well as the capacity of infrastructure in any particular location.

### **Greystones – Delgany**

The housing growth targeted for Greystones-Delgany (GD) from 2016 to 2031 is 'not less than 30%' which would require the delivery of approximately 2,465 housing units. This is stated in Table 3.3.

Having regard to the number of units that have been delivered since 2022 (up to Q3 2025) in GD, the target from 2025 onwards to 2031 is 1,717 units. This is stated in Table 3.5. In addition, 476 units are either currently under construction or are permitted and awaiting commencement.

In order to support the delivery of an additional 1,241 units, at an assumed average density of 50 dph, Table 3.5 states that 25ha of zoned and serviced land would be required. The table then goes on to state that there is already 45ha of zoned and serviced land available (with no permission) i.e. an oversupply or headroom of 80%.

The lands currently zoned in GD have been carefully considered to ensure the optimal spatial layout for the town including compact growth and environmental protection considerations. There has been no de-zoning proposed in the recent Greystones-Delgany and Kilcoole LPF process that was not related to avoiding environmentally sensitive areas or locations that could not be serviced.

As part of the 'Call for Sites' exercise, a detailed assessment of capacity of GD to absorb more housing than provided by for current targets will be carried out.

### **Arklow**

The housing growth targeted for Arklow from 2016 to 2031 is a very high 70% which would require the delivery of approximately 3,896 housing units. This is stated in Table 3.3.

Having regard to the number of units that have been delivered since 2022 (up to Q3 2025) in Arklow, the target from 2025 onwards to 2031 is 3,793 units. This is stated in Table 3.5. In addition, 862 units are either currently under construction or are permitted and awaiting commencement.

In order to support the delivery of an additional 2,881 units at an assumed average density of 45 dph, Table 3.5 states that 67ha of zoned and serviced land would be required. The table then goes on to state that there is already 99ha of zoned and serviced land available (with no permission) i.e. an oversupply or headroom of 47%.

The lands proposed to be zoned in Arklow in the new LPF have been carefully considered to ensure the optimal spatial layout for the town including compact growth and environmental protection considerations. There has been no de-zoning proposed in the LPF process that was not related to avoiding environmentally sensitive areas or locations that could not be serviced.

As part of the 'Call for Sites' exercise, a detailed assessment of capacity of Arklow to absorb more housing than provided by for current targets will be carried out.

### **Baltinglass**

The short to medium term growth possible in Baltinglass is severely limited by a lack of wastewater treatment capacity. As of August 2025, the WWTP in Baltinglass had spare capacity of 467pe, the equivalent of c. 189 dwellings. Having regard

to the housing development underway at that time (and yet to discharge to the WWTP) and development permitted yet to commence in the town, it has been determined that there is capacity for c. 48 additional dwelling units at this time. Uisce Eireann has confirmed that it has no project planned to address this deficiency.

It is not therefore considered reasonable or appropriate to allocate a housing growth target to a location where it cannot be fulfilled in the period of the plan. This would undermine the overall aim of the variation to activate and support housing delivery in the immediate term. In accordance with the National Planning Framework *'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'* (NPO 103).

This matter is best re-considered in the next review of the County Development Plan, which will have a much longer horizon, within which it would be hoped wastewater deficiencies could be addressed.

### **Enniskerry**

Enniskerry is designated a Level 4 'Self Sustaining Town' in the adopted County settlement hierarchy, not a 'Small Town'. This is not proposed to be changed via the Proposed Variation.

There is some concern expressed in submissions that there is a proposal to alter Enniskerry's designation in the settlement hierarchy – this is not correct, but this misunderstanding has arisen due to the changes proposed to Chapter 6, in particular to Table 6.1 relating to density. In that table, the published Proposed Variation showed Enniskerry grouped with a number of towns in the category of 'Key Town / Large Town' in order to express the density objectives, but this has been reviewed and the CE is happy to recommend that this Table 6.1 be amended to show Enniskerry in 'Small / Medium Town' category for density purpose. This change is set out in more detail later on in this report, in the section entitled 'Topic 2 Density'.

However this recommended change does not alter the overall proposals with respect to the new growth objective for Enniskerry, which is detailed in Tables 3.3 and 3.5. In order to comply with the new Ministerial housing targets, additional housing is required to be absorbed by all areas of the County, and as set out in Table 3.3, Enniskerry is deemed suitable for a growth rate of not less than 30% having regard to its location with respect to the Metropolitan Area.

With respect to alleged inconsistency between Table 3.4 and 3.5 with respect to Enniskerry, Table 3.4 outlines that there is currently c. 13ha of zoned and serviced undeveloped residential land in Enniskerry, with theoretical capacity for 455 units (at average density of 35dph). Table 3.5 sets out that given the target for future growth for Enniskerry up to 2031 (159 units), there is a need for 4.5ha of zoned and serviced residential land (at 35dph). Table 3.5 show that while this is need for 4.5ha to meet the target, there is actually 13ha available, i.e. that there is a surplus or there is 'additional provision' / headroom. Therefore overall, the tables indicated that given the target, there is adequate land zoned to meet the target and no new land is therefore required to be zoned. There is no inconsistency between the tables.

With respect to the 13ha in Enniskerry identified, this is located at: c. 9ha at Parknasilloge and c. 4ha at Berryfield Lane.

### **Blessington**

The lands currently zoned in Blessington have been carefully considered to ensure the optimal spatial layout for the town including compact growth and environmental protection considerations. As part of the 'Call for Sites' exercise, a detailed assessment of capacity of Blessington to absorb more housing than provided for current targets, or to review the current zoning provisions, will be carried out.

A key consideration in Blessington will be availability of wastewater treatment capacity as capacity in the WWTP is rapidly being taken up by new developments under construction / permitted and projects in development on existing zoned lands.

## **Newtownmountkennedy**

The housing growth targeted for Newtownmountkennedy from 2016 to 2031 is a high c. 60% which would require the delivery of approximately 892 housing units. This is stated in Table 3.3.

Having regard to the number of units that have been delivered since 2022 (up to Q3 2025) in Newtownmountkennedy (which is 347 units), the target from 2025 onwards to 3031 is 545 units (892 – 347). This is stated in Table 3.5.

Having regard to the number of units under construction or permitted and awaiting commencement in Newtownmountkennedy (490 units), the remaining number of units required is 55 (545 – 490). This is stated in Table 3.5.

In order to support the delivery of an additional 55 units, at an assumed density of 35 dph, Table 3.5 states that 1.6 ha of zoned and serviced land would be required. The table then goes on to state that there is actually 3 ha of zoned and serviced land available (with no permission) i.e. an oversupply or headroom of 87.5%.

With respect to the inconsistency alleged in Submission 71, firstly the submission has not taken into account the 347 units delivered 2022-2025. Secondly, with respect to Table 3.4, it is stated that there is c. 3ha of land available and this has a capacity of 77 units. In the assessment of the capacity of 'mixed use' lands in any town, which in most cases comprises 'town centre' zoned land, the capacity of said lands has been discounted by 50% to allow for partial use of these lands for commercial / community / other non-residential development. This is considered a very 'generous' discount and therefore is a robust assessment as it under-estimates the actual capacity of the land.

In Newtownmountkennedy, available zoned 'town centre' zoned land as of Q3 2025 was calculated as 1.97ha. This was discounted by 50%, and a density of 35 dph applied to give said 1.97ha an assumed capacity of c. 35 units. It was also determined that at that time, there was c. 1.2ha of undeveloped zoned residential land also available; assuming again density of 35 dph, these lands would have capacity for c. 42 units. Therefore the total capacity stated in Table 3.4 is 77 units (35 + 42).

This is considered to be a significant under estimation of the capacity of 'town centre' lands; for example, since Q3 2025, a town centre zoned site of 0.17ha in Newtown (which was not included in this 1.97ha) has been granted permission for a mixed use development including commercial use at ground floor and 21 residential units. This is the equivalent of a density of 124 dph with no discount for the commercial space.

Therefore the CE is satisfied that data presented is accurate and indeed that in many cases, the estimation of zoned land capacity has erred on the low side.

With regard to concerns raised that the future growth of 55 units for Newtownmountkennedy is 'too low' given the demand for housing in the town, the CE rejects this suggestion as the growth rate provided for Newtown is particularly high at 60%, and in the case on this particular town, a significant protection of this growth will be addressed by developments under construction / permitted yet commence. In addition, with respect to concerns raised about town centre developments, the provisions of the County Development Plan already states that: *'.....there shall be no quantitative restriction inferred from this Core Strategy and associated tables on the number of units that may be delivered on town centre regeneration / infill / brownfield sites'*.

The longer term needs beyond the current plan period will be reviewed as part of the 'Call for Sites' exercise and if it is deemed that Newtownmountkennedy has the carrying capacity for additional dwellings above the current targets, then the option for increasing the target / further zoning can be reviewed.

A key consideration in the exercise will be the capacity of Newtownmountkennedy to absorb more housing that provided by for current targets / current committed development, and evidence at this time suggest services, particular community / social infrastructure, are under extreme pressure. While there may be a high 'demand' for housing in the northeast Wicklow area, this demand should only be met by new supply where such new dwellings can be sustainably serviced;

'demand' requires to be directed to locations where services have capacity or upgrades to infrastructure are committed and it is not evident at this time that that is the case in Newtownmountkennedy.

### **Rathdrum**

Having regard to Rathdrum's place in the settlement hierarchy and its characteristics, a high growth rate of 45% is proposed. This would require the delivery of c. 390 units in the 2022-2031 period. Having regard to units completed since 2022, the outstanding target is 190 units. There are 141 units under construction as of Q3 2025. Therefore a further 49 units are required. This would require 1.4ha of zoned and serviced land, whereas at this time there is 2.5ha of zoned and serviced land available without permission i.e. a surplus of 1.1ha or headroom of 80%. Therefore having regard to the target up to 2031 as expressed in the Proposed Variation, there is no shortfall of zoned and serviced land to meet the current housing target.

It should be noted that in Rathdrum there is, in addition, a further 10.6ha of land zoned for residential use but that is currently unserviced due to deficiencies in the Rathdrum WWTP, a deficiency that could not for example be rectified by an individual landowner / developer, but would be a matter for Uisce Eireann to resolve.

It is acknowledged in the Proposed Variation that the amount of currently zoned and serviced land may not be adequate to meet longer term requirements beyond 2031. This will be considered and addressed after this Variation process is complete, and will take into account submissions made in the 'Call for Sites' process which will assist in identifying where there are interested landowners, ready to come forward with development, as well as the capacity of infrastructure in any particular location.

### **Kilcoole**

The housing growth targeted for Kilcoole from 2016 to 2031 is a high c. 60% which would require the delivery of approximately 926 housing units. This is stated in Table 3.3.

Having regard to the number of units that have been delivered since 2022 (up to Q3 2025) in Kilcoole, the target from 2025 onwards to 3031 is 878 units. This is stated in Table 3.5.

In order to support the delivery of an additional 878 units, at an assumed density of 35 dph, Table 3.5 states that 18.5ha of zoned and serviced land would be required. The table then goes on to state that there is already 31 ha of zoned and serviced land available (with no permission) i.e. an oversupply or headroom of 68%.

The lands currently zoned in Kilcoole have been carefully considered to ensure the optimal spatial layout for the town including compact growth and environmental protection considerations. A key factor influencing the development strategy for the Kilcoole is the need to ensure no development adversely impacts on the EU sites to the east of same, which are located between the town and the coast / rail line.

As part of the 'Call for Sites' exercise, a detailed assessment of capacity of Kilcoole to absorb more housing than provided by for current targets will be carried out. A key consideration will be accessibility to transport and how to take advantage, if feasible, of planned improved services on the Greystones – Wicklow Town stretch of the Dublin – Rosslare line. While the development of locations proximate to high quality rail services may fulfil aspirations for 'transport oriented development', given the requirements of the EU Habitats and Bords Directives, it may not be possible in the case of Kilcoole to consider lands between Kilcoole and the rail station for more intensive development. Other options will need to be evaluated in this regard including for example the improvement of walking and cycling infrastructure between the town and the station, and local bus linkages.

With regard to Kilcoole's position in the settlement hierarchy, revisions to the settlement hierarchy does not form part of this Proposed Variation and this would require more detailed and careful consideration, more appropriately through the next review of the County Development Plan.

## Ashford

At the time of the preparation of the 2022 County Development Plan, the most recent Census of population (from 2016) showed that the population of Ashford was under 1,500. The Planning Act provides that the Core Strategy may show the targets for towns under 1,500 in an aggregated format. The 2022 Census shows that Ashford has now grown to 1,892 persons, and there has been further growth since, and therefore there is merit in the suggestion that Ashford be decoupled from the settlements under 1,500 for the purpose of expressing population and housing growth targets. It is recommended that this be done via the review of the County Development Plan (which is due to start in 2026) which will allow this to be considered in an overall and holistic review of the settlement hierarchy and growth strategies for all settlements in the County.

With respect to suggestion that future growth in Ashford be limited or reduced would not be consistent with national policy to promote and support the development of new housing in high demand areas, on zoned and serviced lands. In this regard, the key concern raised in the submission relates to the insufficiency of sports and recreational infrastructure to accommodate new residents, and rather than curtailing new housing, it would appear that a more constructive approach would be to address the infrastructural issues. More assessment of infrastructure issues is set out to follow under 'Topic 3'.

### Level 6 Settlements

Aggregate targets are provided for towns, which are under 1,500 in size.

As provided for in the Planning Act,

*2A Without prejudice to the generality of subsection (1A), a core strategy shall -*

*(f) in respect of the area of the development plan of a county council, set out a settlement hierarchy and provide details of -*

*(vi) aggregate projected population, other than population referred to in subparagraph (v), in—*

*(I) villages and smaller towns with a population of under 1,500 persons, and*

*(II) open countryside outside of villages and towns,*

Table 3.3 of the Proposed Variation sets out that towns in Level 6 are not considered to have capacity to growth at a rate in excess of 30%; a cumulative growth rate of 20% is deemed appropriate. This is reflective of their place in the hierarchy, their small size and the generally limited infrastructural capacity to absorb significant growth. In addition, such small settlements tend to be lower in the priority list for investment in areas such as water supply / wastewater disposal, which may be necessary to accommodate additional growth.

It is not intended that the expression of Level 6 targets as a cumulative total would impede an otherwise acceptable development in one Level 6 settlement due to the 'target' already being taken up in the other level 6 settlements. Rather, the evaluation of the suitability of any development proposal would entail consideration of the impact of that development on the village (which would include evaluation of the rate of growth that has occurred in that settlement and whether that is consistent with the overall objective of c. 20% growth over the period), and the capacity of local services to accommodate same.

**Newcastle:** As part of the 'Call for Sites' exercise, a detailed assessment of capacity of Newcastle to absorb more housing than provided by for current targets will be carried out. A key consideration will be availability of wastewater treatment capacity as the WWTP in Newcastle is now at capacity and no upgrades are programmed in the short to medium term.

**Chief Executive's Recommendation****Amend the Proposed Variation as follows:****Recommendation 1**

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**Add the following sentence beside Table 3.5**

*The new housing target for 2025-2031 as provided for County Wicklow by the new Guidelines for the 2025-2031 period is 14,476 units (Table 3.1).*

*Table 3.5 shows the new targets for the Level 1-6 settlements in the County as 17,908 units.*

*Therefore the new target 2025-2031 exceeds the Guidelines by c. 25%.*

## Topic 2      Density / design

The submissions to follow all raised issues with respect to density. The submissions are grouped as follows:

- 'general' which means the submission is relating to density generally in a non-specific location
- 'location' i.e. they raise density issues with regard to a specific area / settlement.

No.	Name	Subject	Issue raised
05	<a href="#">Greenleaf Homes Limited</a>	<b>General</b>	<p>The submitter wishes to raise concerns with respect to the densities assumed in the proposed variation as they believe this will give rise to a development format that is economically unviable. They put forward that because of this economic viability the PV will not give rise to an expansion in housing delivery that is urgently required and which is stated Government policy.</p> <p>It is submitted that the density range assumed would require the construction of a significant number of high density apartments and this is a concern because of the cost of construction of an average apartment compared to the average sale value for apartments.</p> <p>It is put forward that the cost of construction of semi-detached housing and duplex units is significantly lower to such an extent that construction of these formats of development is viable.</p> <p>It is put forward that this specific issue has already been addressed in a letter from the Minister for Housing to the Chief Executives of all the City and County Councils on the 11th of December 2025. This letter advised Councils to apply "<i>realistic and deliverable residential density assumptions</i>". The letter proceeds to advise Councils that they should assume that net densities range between 65% and 80% of the Gross Site Areas.</p> <p>In light of these concerns, it is requested that:</p> <ul style="list-style-type: none"> <li>- the figures in the column entitled '<i>zoned lands with no live permission</i>' should be discounted by approximately 30% to reflect the net site areas available in each settlement</li> <li>- that density assumptions are reduced to 50 dph in Bray and to 35dph in Level 2 and 3 settlements</li> </ul>
30	<a href="#">Nimol Holdings Limited</a>	<b>General</b>	<p>The submitter wishes to raise concerns with respect to the densities assumed in the proposed variation as they believe this will give rise to a development format that is economically unviable.</p> <p>It is submitted that the density range assumed would require the construction of a significant number of high density apartments and this is a concern because of the</p>

			<p>cost of construction of an average apartment compared to the average sale value for apartments.</p> <p>It is put forward that the cost of construction of semi-detached housing and duplex units is significantly lower to such an extent that construction of these formats of development is viable.</p> <p>They put forward that because of this economic viability the PV will not give rise to an expansion in housing delivery that is urgently required and which is stated Government policy.</p> <p>In light of these concerns, it is requested that:</p> <ul style="list-style-type: none"> <li>- the figures in the column entitled '<i>zoned lands with no live permission</i>' should be discounted by approximately 30% to reflect the net site areas available in each settlement</li> <li>- that density assumptions are reduced to 50 dph in Bray and to 35dph in Level 2 and 3 settlements</li> </ul>
51	<a href="#">Wicklow Planning Alliance</a>	<b>General</b>	<p>The submitters suggest that previous density / design guidelines have not been adequate to ensure 'good design'. The submitters commend a particular approach of 'low rise, medium density' and provide link to a presentation / article in relation to same. The submitters suggest further changes to the Housing chapter of the CDP to incorporate such concepts.</p>
65	<a href="#">Niall Melvin</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ The submitters notes that while higher densities are appropriate in principle in accessible, well-served urban locations, credible concerns have been raised about the economic viability of apartment-led schemes at these densities in current market conditions. It is put forward that if a density assumption of 75 dph for Bray is to be retained as a Core Strategy input, it is necessary to assess the realistic likelihood of such schemes being delivered at scale within the life of the plan. It is suggested that a more viable and therefore more reliable density assumption for Bray would be around 50 dph.</li> <li>▪ It is suggested that any adjustment to density assumptions in Bray should be reflected transparently in the Core Strategy, with a corresponding recalibration of housing quantum and land requirements, across the County, including for Wicklow Town – Rathnew.</li> </ul>
79	<a href="#">Glenveagh Homes Ltd.</a>	<b>General</b>	<ul style="list-style-type: none"> <li>▪ The submission expresses concern that the densities assumed in the proposed variation will give rise to a development format that is economically unviable</li> </ul>

			<p>and that in such a situation, whilst the population and housing targets may have been increased through this variation, in practice because of the economic unviability, the measure will not give rise to the expansion in housing delivery that is urgently required and which is stated Government Policy.</p> <ul style="list-style-type: none"> <li>It is requested that density assumed for Bray be reduced to 50 dph and to 35 dph for Level 2 and 3 settlements.</li> </ul>
85	<a href="#">Greg Kavanagh</a>	<b>General</b>	<ul style="list-style-type: none"> <li>The submission puts forward that realistic densities have not been assumed, and unviable densities mean that sites won't be developed.</li> <li>It is suggested that density calculations should assume 70% net developable area</li> </ul>
86	<a href="#">Ardale Property Group</a>	<b>General</b>	<ul style="list-style-type: none"> <li>The submission raises concerns about the density standards applied to calculate the amount of zoned land required.</li> <li>It is put forward that assumptions at the upper limits and maximum standards should not be assumed particularly given that the Sustainable Residential Developments and Compact Settlements Guidelines assumes that <i>"in forecasting the capacity of lands for housing delivery where non-residential uses, such as main roads, retail, employment and major open spaces are being planned in conjunction with housing, an allowance needs to be made in the density assumption for the land that will be occupied by such uses, which may be upwards of 25% when forecasting the capacity of a land."</i></li> <li>In addition, it is put forward that the Compact Settlement Guidelines set out that densities should also correspond to established development patterns in certain locations and it is requested that the Planning Authority satisfy themselves as to whether the quantum of zoned residential lands identified under the Variation is sufficient to realistically meet the stated housing growth requirements, having regard to appropriate density ranges and local context.</li> </ul>
94	<a href="#">BBA Architecture</a>	<b>General</b>	It is submitted that minimum densities of 50 dph may be inappropriate and unviable in certain areas of metropolitan towns and that flexibility may be required in this regard
109	<a href="#">Cairn Homes</a>	<b>General</b>	It is submitted that the future housing capacity presented in Table 3.4 uses an average density of 44 dph

			and it is suggested that this would be quite high for Wicklow where average densities being permitted are considerably lower.
112 117	<a href="#">Shane Stokes</a> <a href="#">Shane Stokes</a>	<b>General</b>	The submission requests that in the application of increased densities, the Council recognises the amenity and privacy consideration of existing residents on the outskirts of towns, and also the potential imbalance of new estates further out of town having higher densities than those currently in place on the outskirts.
74	<a href="#">Borg Developments and Cairn</a>	<b>Bray</b>	The submission requests confirmation that the Fassaroe lands fall within the "metropolitan town", "suburban / urban extension" category of Bray in the newly added "Table 6.1 – Areas and Density Ranges". It is also requested that the Planning Authority either incorporate a map / series of maps defining the different area types for relevant settlements corresponding to the provisions of proposed Table 6.1 or make some relevant clarifications within Table 6.1 itself.
07 14 19 21 24 26 28 29 31 34 36 38 39 41 42 43 44 45 46 47 52 53 54 55 59 61 62 63 66 67 70	<a href="#">Anne Marie Carew</a> <a href="#">Orla Swan</a> <a href="#">Alex Pigot</a> <a href="#">Catherine Nolan</a> <a href="#">Michelle Cronin</a> <a href="#">Friends of Knocksink Woods</a> <a href="#">Tina Roche</a> <a href="#">Brian Donnelly</a> <a href="#">Lorna Kelly</a> <a href="#">Gill Toal</a> <a href="#">Jenny Derbyshire</a> <a href="#">Sally Phelan</a> <a href="#">Catherine Nunes</a> <a href="#">Rosemary Riordan</a> <a href="#">Rosemary Riordan</a> <a href="#">Paula Cantillon</a> <a href="#">Thomas Riordan</a> <a href="#">Edwina and Dale Allman</a> <a href="#">James Barry</a> <a href="#">Janet Sheehy</a> <a href="#">Malachy Quinn</a> <a href="#">Robert Neill</a> <a href="#">Joanne Coogan</a> <a href="#">Patricia Walker</a> <a href="#">Albert Smith</a> <a href="#">Dr. Graham McMullin</a> <a href="#">Caroline O'Callaghan</a> <a href="#">Zandra McMullin</a> <a href="#">Liz McMahan and Joe Wilson</a> <a href="#">Dave Casey</a> <a href="#">Aidan Harmon</a>	<b>Enniskerry</b>	<p>The submissions listed raise some or all of the following concerns with respect to density objectives / development formats for Enniskerry:</p> <ul style="list-style-type: none"> <li>▪ The density proposed in proposed Table 6.1 for Enniskerry is inappropriate and excessive</li> <li>▪ No rationale for the proposed increase has been given</li> <li>▪ There is nowhere where in Enniskerry currently in excess of 25 dph and achievement of 35 dph would require small, duplex or apartment units</li> <li>▪ Enniskerry lacks the appropriate infrastructure for the increased densities proposed (see next section for expansion of the infrastructure submissions)</li> <li>▪ The building heights that would be required to meet the proposed new densities would adversely impact on the visual amenity and heritage of the town</li> <li>▪ Higher density would result in buildings being closer together</li> <li>▪ High density development, given the topography of Enniskerry, would give rise to additional flood risk</li> <li>▪ Density of 20/25 dph would be appropriate for Enniskerry</li> <li>▪ Increased density without improved transport infrastructure would result in increased car dependence and transport emissions</li> <li>▪ The proposal to increase housing densities for Enniskerry would not accord with the Council's Climate Action Plan</li> </ul>

72	<a href="#">Catherine O'Connor</a>		<ul style="list-style-type: none"> <li>▪ The proposal to increase housing densities would be likely to adversely impact on the Tufa Spring regime, (protected under EU Habitats Directive and Irish Law,) in Knocksink Woods, Special Area of Conservation (SAC)</li> <li>▪ Concerns raised regarding the low density, large house type of developments built historically in Enniskerry which are not targeted to be affordable by local families and do not allow future generations to live in the locality close to their families</li> </ul>
76	<a href="#">Kilian Mullet</a>		
77	<a href="#">Ger Leonard</a>		
78	<a href="#">Nigel Pepper</a>		
80	<a href="#">Sorcha O'Keeffe</a>		
81	<a href="#">Carol Ann O'Keeffe</a>		
82	<a href="#">Patricia O'Keeffe</a>		
89	<a href="#">Brien Vahey</a>		
95	<a href="#">Brien Vahey</a>		
104	<a href="#">Sarah Leckie</a>		
107	<a href="#">Board of Eagle Valley Consolidated Management</a>		
111	<a href="#">Georgina Young</a>		
115	<a href="#">Rebecca Candon</a>		
102	<a href="#">Maguire Family</a>	<b>Enniskerry</b>	The submitters welcome the proposed new density figures for level 4 large town urban extension; i.e. 30 dph to 50 dph Up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations.
112	<a href="#">Shane Stokes</a>	<b>Newtownmount-kennedy</b>	With respect to increase densities in Newtownmountkennedy, the submission suggests that Newtownmountkennedy does not meet the standards for 'accessible' suburban / urban extension locations as it lacks a rail line or high quality / frequency bus service.
117	<a href="#">Shane Stokes</a>		
86	<a href="#">Ardale Property Group</a>	<b>Newcastle</b>	It is put forward that density of 40 dph has been assumed for Newcastle in calculating zoned land requirements; whereas assuming lower 25 dph would mean more land would require to be zoned.

**Opinion of the Chief Executive**

**General**

The density assumptions applied are consistent with Government policy on increased density as set out in '*Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities*' (DoHLGH 2024) which are already in force and already being implemented by both Wicklow County Council and An Coimisiun Pleanala.

The density appropriate on any site must take into account a range of factors including location within the town, the physical characteristics of the lands, the adequacy of infrastructure at that location, which all would be determined on a case by case basis, guided by the range detailed in Table 6.1.

The formats and densities of new development that are promoted cannot be left to the market alone to dictate as this will not deliver the range of house types and sizes needed by all in society and will not bring the best outcome for society in terms of investment in infrastructure, community development and environmental protection. As set out in the Guidelines:

*"The NPF priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out.*

*There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens. Dispersed growth is also accelerating environmental degradation through loss of farmland and habitat and impacts on water quality. It creates a higher demand for new infrastructure and services in new communities that places a heavy financial burden on the State and results in a constant cycle of infrastructure catch-up."*

With respect to apartment viability, this is a complex problem related to range of factors including (but not limited to) high building costs, investment capital availability and planning risk. However, it simply is not realistic for the Government's housing unit targets to be achieved without a high proportion of new units being in higher density, possibly apartment format (but not exclusively) in locations where services are already present, for example in town centres and on brownfield sites. The alternative of lower density development, sprawling around the edges of all our settlements, is no longer an alternative option, given the significant cost to society from same including car dependency, longer travel distance with resulting personal and social impacts, cost of provision of and long term maintenance of new services, climate impacts, loss of biodiversity, hollowing out of town centres etc.

On 29 January 2026, the CSO released figures on housing unit completions for 2025 and as noted by the Minister 'One key indicator of progress is the delivery of new apartments. Encouragingly, after a very significant drop-off in apartment delivery in 2024, today's figures show a 38.7% increase in apartments in 2025 compared to 2024 with more than 12,000 apartments completed. This is the highest completions figure for apartments since the CSO began collating this data set in 2011'.

It must also be taken into account that higher densities do not always require the construction of high cost 'high rise apartments'. The RIAI and others have published on 'low rise medium density' housing, which is a format of housing that can achieve up to 80 dph while not exceeding 4 storeys, generally with own door access; for more information, see: <https://www.riai.ie/whats-on/news/riai-research-identifies-new-low-rise-medium-density-housing-model-capable-of-more-than-doubling-own-door-dwellings-per-hectare>

It is not considered necessary as suggested to further amend the County Development Plan to directly address this particular development format; the County Development Plan already set out the following objective which is considered to adequately address and support the 'low rise medium density' concept: *Higher density proposals should be designed to a high standard, incorporate a mix of housing types and sizes and deliver compact urban forms that enhance the local built environment and contribute towards a sustainable mix of housing options. Proposals should provide an appropriate design response to the site, be designed to a high quality and afford adequate protection for residential amenity of neighbouring properties.*

It should also be borne in mind that the density assumptions for each settlement are an 'average' density across the town, with some available sites being able to achieve more than the average density assumed (for example on town centre infill sites), and some may achieve slightly lower than this when the full range of site factors are taken into account. A density assumption used therefore in Table 3.5 of the Proposed Variation to determine / evaluate zoned land needs, does not imply that all developments on every piece of zoned land in that town will be required to 'achieve' that density. The density appropriate on any site must take into account a range of factors including location within the town, the physical characteristics of the lands, the adequacy of infrastructure at that location, which all would be determined on a case by case basis, guided by the range detailed in Table 6.1.

As already set out in the Wicklow County Development Plan: *"Higher densities are encouraged to achieve an efficient use of land and create compact, vibrant and attractive settlements. The capacity of a site to absorb higher densities is influenced by a range of factors including the local setting, development context, neighbouring uses, access, topography etc. The preparation of a design*

*statement, including a detailed contextual and site analysis, will help determine a site's capacity and the appropriate density. The potential of brownfield sites to consolidate the built form and deliver higher densities should be capitalised subject to protecting existing amenities and achieving high quality standards for future occupants."*

With respect to the suggestion that the different location 'types' within any settlement i.e. 'centre and urban neighbourhoods', 'suburban / urban extension' etc should be identified, this is being done in new LAPs / LPFs, and will be integrated into the medium and smaller towns where necessary through the next review of the County Development Plan.

### **Gross – Net Densities**

It is suggested the Proposed Variation has not considered 'gross' versus 'net' density. It is suggested that 'zoned lands with no live permission' be discounted to account for the difference between gross and net density. This is not considered accurate as this factor **has been considered** in the analysis carried out to prepare the Proposed Variation.

In particular, in the statement of the amount of zoned and serviced land available for residential development in each settlement set out in Table 3.5, lands that would be required for the following uses have been discounted already and are not included in the figure stated:

- Major road/streets such as Arterial Streets and Link Streets as defined by Section 3.2.1 DMURS.
- Lands used for commercial development (inc. retail, leisure and entertainment).
- Lands for primary schools, churches and other community services and facilities.
- Larger, Regional or District Parks, Wayleaves or rights of way.
- Other areas of land that cannot be developed due to environmental sensitives, topographical constraints (i.e. steepness) and/or are subject to flooding.

*(Source: Table 1 of Appendix B of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities 2024)*

In the assessment of the capacity of 'mixed use' lands in any town, which in most cases comprises 'town centre' zoned land, the capacity of said lands has been discounted by 50% to allow for partial use of these lands for commercial / community / other non-residential development. This is considered a very 'generous' discount and therefore is a robust assessment as it underestimates the actual capacity of the land.

For example, in Newtownmountkennedy, available 'town centre' zoned land as of Q3 2025 was calculated as 1.97ha. This was discounted by 50%, and a density of 35 dph applied to give said 1.97ha an assumed residential capacity of 34.5 units. However, since that date, a town centre zoned site of 0.17ha in Newtown has been granted permission for a mixed use development including commercial use at ground floor and 21 residential units. This is the equivalent of a density of 124 dph with no discount for the commercial space.

This was not detailed in the Proposed Variation, in the interests of legibility and understanding for the public, and in order to not have too many footnotes or caveats throughout the document. However this can be added if it aids in understanding.

### **Density assumptions**

There are two places in the Proposed Variation where density assumptions are detailed:

- The first location is in Table 3.5 which includes an assumption of an appropriate average net density for each settlement in order to calculate the zoned land requirements for that settlement;
- The second location is in the proposed amendments to Chapter 6 where a proposed new density table is shown.

It may be perceived that there is an inconsistency between these two parts of the Proposed Variation and in order to clarify matters, the following information should be noted:

- The average net densities assumed in Table 3.5 are as follows:

Level	Town	Net Density
1	Bray	75 dph
2	Wicklow - Rathnew	50 dph
3	Arklow	35 dph
	Greystones - Delgany	50 dph
	Blessington	35 dph
4	Baltinglass	35 dph
	Enniskerry	35 dph
	Kilcoole	35 dph
	Newtownmountkennedy	35 dph
	Rathdrum	35 dph
5	Ashford, Aughrim, Carnew, Dunlavin, Tinahely	25 dph
6	Avoca, Donard, Kilmacanogue, Newcastle <sup>7</sup> , Roundwood, Shillelagh	25 dph

- Proposed Table 6.1 set out the following density ranges for each settlement

Level	Town	Net Density
1	Bray	35 – 150 dph
2	Wicklow - Rathnew	30 – 100 dph
3	Arklow	30 – 100 dph
	Greystones - Delgany	35 – 150 dph
	Blessington	30 – 100 dph
4	Baltinglass	30 – 100 dph
	Enniskerry	30 – 100 dph

<sup>7</sup> **Note:** Density of 40dph for Newcastle in Level 6 has not been assumed as suggested in one submission.

	<b>Kilcoole</b>	<b>30 – 100 dph</b>
	<b>Newtownmountkennedy</b>	<b>30 – 100 dph</b>
	<b>Rathdrum</b>	<b>30 – 100 dph</b>
<b>5</b>	<b>Ashford, Aughrim, Carnew, Dunlavin, Tinahely</b>	<b>25 – 40+ dph</b>
<b>6</b>	<b>Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh</b>	<b>25 – 40+ dph</b>

Therefore it can be clearly seen that the densities assumed in Table 3.5 are well within the ranges set out in proposed Table 6.1 and in most cases is very much at the lower end.

Having regard however to submissions made, Table 6.1 has been reviewed and it is recommended that amendments be made to same to better align with the Guidelines and to into account the County settlement hierarchy:

<b>Level</b>	<b>Town</b>	<b>Category proposed in Proposed Variation</b>	<b>Proposed Revised category</b>	<b>Proposed Revised Net Density</b>
<b>1</b>	<b>Bray</b>	<b>Metropolitan Town</b>	<b>Metropolitan Town</b>	<b>35 – 150 dph</b>
<b>2</b>	<b>Wicklow - Rathnew</b>	<b>Key Town / Large Town</b>	<b>Key Town / Large Town</b>	<b>30 – 100 dph</b>
<b>3</b>	<b>Arklow</b>	<b>Key Town / Large Town</b>	<b>Key Town / Large Town</b>	<b>30 – 100 dph</b>
	<b>Greystones - Delgany</b>	<b>Metropolitan Town</b>	<b>Metropolitan Town</b>	<b>35 – 150 dph</b>
	<b>Blessington</b>	<b>Key Town / Large Town</b>	<b>Key Town / Large Town</b>	<b>30 – 100 dph</b>
<b>4</b>	<b>Baltinglass</b>	<b>Key Town / Large Town</b>	<b>Small / Medium Town</b>	<b>25 – 40+ dph</b>
	<b>Enniskerry</b>	<b>Key Town / Large Town</b>	<b>Small / Medium Town</b>	<b>25 – 40+ dph</b>
	<b>Kilcoole</b>	<b>Key Town / Large Town</b>	<b>Small / Medium Town</b>	<b>25 – 40+ dph</b>
	<b>Newtownmountkennedy</b>	<b>Key Town / Large Town</b>	<b>Small / Medium Town</b>	<b>25 – 40+ dph</b>
	<b>Rathdrum</b>	<b>Key Town / Large Town</b>	<b>Small / Medium Town</b>	<b>25 – 40+ dph</b>
<b>5</b>	<b>Ashford, Aughrim, Carnew, Dunlavin, Tinahely</b>	<b>Small / Medium Town</b>	<b>Rural Town or Village</b>	<b>Not specified</b>
<b>6</b>	<b>Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh</b>	<b>Small / Medium Town</b>	<b>Rural Town or Village</b>	<b>Not specified</b>

The proposed revised Table 6.1 is set out in the recommendation to follow.

The densities assumed in Table 3.5 are still well within the range set out by the proposed revisions to Table 6.1, and therefore the recommended amendment to Table 6.1 does not require a corresponding change to Table 3.5.

**Bray**

With respect to Bray, the Guidelines would identify the central area and 'urban neighbourhoods' as suitable for a density range of 50 – 150 dph, whereas density in 'suburban / urban extension' in such towns would be 35 dph - 50 dph and up to 100 dph open for consideration at 'accessible' suburban / urban extension locations. In light of these ranges, as an overall town, for the purposes of Table 3.5, an average net density of 75 dph was taken.

The current density objective for Bray as set out in the Bray MD LAP is '*not less than 50/ha*' on lands zoned New Residential – High Density, and no density limit specified for town centre / opportunity sites / infill. For example, the density proposed (and deemed acceptable by ACP) at the Heiton Buckley site in Bray was over 150 dph. The permitted density at the Kilruddery Glen SHD on Bray Southern Cross was 73 dph. The density proposed at the Bray golf course development is c. 70 dph.

A density assumption used in Table 3.5 of the Proposed Variation to determine / evaluate zoned land needs, does not imply that all developments on every piece of zoned land in that town will be required to 'achieve' that density. The density appropriate on any site must take into account a range of factors including location within the town, the physical characteristics of the lands, the adequacy of infrastructure at that location, which all would be determined on a case by case basis, guided by the range detailed in Table 6.1.

With respect to Fassaroe specifically, the density that would be deemed appropriate would be guided by the Guidelines and take into account the characteristics / locations of the lands. In its evaluation of a recent application at Bray Fassaroe, the Inspector commented '*As previously outlined, the Guidelines encourage densities at or above the mid density range at 'accessible locations'. Given that densities in the range 50 dph to 150 dph (net) shall generally be applied in the centres and in urban neighbourhoods of Metropolitan Towns, the mid-density range would be c. 100 dph. The proposed density of 68 dph would be significantly lower than the mid-density range and, accordingly, would not be consistent with the Guidelines. Similarly, I do not consider that it would be consistent with RPO 5.4 in the RSES which outlines that future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities as set out in the 'Sustainable Residential Development in Urban Areas'.*

**Level 2 & 3 settlements**

The current density objective Level 2 and 3 settlements, as set out in the current County Development Plan is that densities of not less than 50dph will be required on lands in such towns in locations where public transport access is available and 35-50dph in more suburban locations. For example, the density permitted at Hawkin's Wood in Greystones was 50dph. The Wicklow Town – Rathnew and Blessington LAPs (adopted in 2025), set out that density is to be determined in accordance with the Guidelines. Therefore the suggestion to reduce densities in these settlements to 35dph is not considered reasonable or appropriate, and would entail going in the opposite direction (i.e. providing for lower density development than required now) to the Government's density objectives as set out in the Guidelines.

**Levels 4 settlements****Enniskerry**

The density range that would be considered appropriate in Enniskerry accordance with the current County Development Plan (which was based on now superseded density guidelines) is:

- Centrally located sites: 30 – 40+ units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.
- Edge of Centre Sites: 20-35 dwellings per hectare.
- Edge of small town / village: Densities of less than 15 – 20 dwellings per hectare (as an alternative to one-off housing) as long as such development does not represent more than 20% of the total new planned housing stock of the small town or village.

In accordance with current guidelines and the amendment now proposed to Table 6.1, the density objective in Enniskerry would be:

- Centrally located sites: The scale of new development should respond positively to the scale, form and character of existing development, and to the capacity of services and infrastructure (including public transport and water services infrastructure) i.e. no limit specified
- Edge of Centre Sites: 20-35 dwellings per hectare.

It is therefore considered that the assumption of an average density in Enniskerry of 35 dph is reasonable and remains appropriate even with the amendment recommended to Table 6.1.

Enniskerry has the highest % of houses over 4 bedrooms in size in the County, with 50.3% of all existing dwellings (as of 2022 Census) being 4 bedrooms or more in size. This compares to 27.5% in Bray and 41.4% in Greystones-Delgany; the County average is 35.6% and the regional average is 40.3%. Enniskerry needs more houses of 3 beds or less, in order to provide a longer term more sustainable mix of dwelling types and sizes for all in society. This is not a 'new' issue, and the current Bray MD LAP provides for the following objectives in Enniskerry:

**R7** *A full range of unit sizes, including smaller 1 and 2-bedroomed units shall be provided in all new housing areas. No more than 50% of the units in any development shall exceed 3 bedrooms or 125sqm in size.*

'Smaller' homes are much more accessible to first time / younger buyers and are also more suitable for those wishing to downsize. Smaller house sizes clearly come hand in hand with slightly higher density formats but a density of 35dph can be achieved without apartment blocks or high rise development. As an example, the existing Millfield housing development (all 2 storey dwellings) comprises 32 dwellings on a site of approximately 1 ha, while the recently granted development at Crimmins Garage has a density of 37dph, with no apartments (all own door dwellings) and height of 2.5-storeys.

### Chief Executive's Recommendation

**Amend Proposed Variation as follows:**

#### Recommendation 2

**Amend Table 3.5 as follows:**

Table 3.5, add the following footnote to Column 8

*'This is the net amount of land required to accommodate the target number of residential units'*

Table 3.5, add the following footnote to Column 9

*'This is the net amount of zoned land available for residential development'; lands required for major road/streets, for commercial development (inc. retail, leisure and entertainment), for primary schools, churches and other community services and facilities, for larger, regional or district parks, wayleaves or rights of way and other areas of land that cannot be developed due to environmental sensitivities, topographical constraints (i.e. steepness) and/or are subject to flooding have not been included in this figure'*

**Recommendation 3**

**Amend Proposed Table 6.1 (Areas and Density Ranges) as follows:**

Areas	Level in WCDP hierarchy	Density Ranges (net)	Applicable to
<b>Metropolitan Towns (&gt;1,500 population) Centre and Urban Neighbourhoods</b>	<b>1</b> <b>3</b>	50 dph - 150 dph	<b>Bray</b> <b>Greystones-Delgany</b>
<b>Metropolitan Towns (&gt;1,500 population) Suburban / Urban Extension</b>		35 dph - 50 dph Up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations.	
<b>Metropolitan Area – Village (&lt;1,500 population)</b>	<b>6</b>	Density should be tailored to reflect existing density and / or built form but should not generally fall below 25 dph.	<b>Kilmacanogue</b>
<b>Key Town / Large Town (5,000+) Centre &amp; Urban Neighbourhood</b>	<b>2</b> <b>3</b>	40 dph-100 dph	<b>Wicklow – Rathnew</b> <b>Arklow</b> <b>Blessington</b> Baltinglass Enniskerry Kilcoole Newtownmountkennedy Rathdrum
<b>Key Town / Large Town (5,000+) Suburban/Urban Extension</b>		30 dph to 50 dph Up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations	
<b>Small / Medium Town (1,500-5,000) Centre</b>	<b>4</b>	The scale of new development in the central areas of small to medium sized towns should respond positively to the scale, form and character of existing development, and to the capacity of services and infrastructure (including public transport and water services infrastructure)	<b>Baltinglass</b> <b>Enniskerry</b> <b>Kilcoole</b> <b>Newtownmountkennedy</b> <b>Rathdrum</b> Ashford Aughrim Carnew Dunlavin Tinahely Avoca Donard Newcastle Roundwood Shillelagh
<b>Small / Medium Town (1,500-5,000) Edge</b>		25 dph - 40 dph	
<b>Rural Town or Village (&lt;1,500)</b>	<b>5 - 9</b>	Development in rural towns and villages is tailored to the scale, form and character of the settlement and the capacity of services and infrastructure (including public transport and water services infrastructure). The density of development at such locations should respond in a positive way to the established context	<b>Ashford</b> <b>Aughrim</b> <b>Carnew</b> <b>Dunlavin</b> <b>Tinahely</b> <b>Avoca</b> <b>Donard</b> <b>Newcastle</b> <b>Roundwood</b> <b>Shillelagh</b> Level 7-9

'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (DoHLGH 2024)

Wicklow County Development Plan 2022-2028: Settlement Hierarchy

### Topic 3      Infrastructure

The submissions to follow all raised issues with respect to the infrastructure required to service increased housing in the County. The submissions are grouped as follows:

- 'general' which means the submission is relating to infrastructure generally in a non-specific location
- 'location' i.e. they raise infrastructure concerns with regard to a specific area / settlement.

No.	Name	Subject	Issue raised
25	<a href="#">David Ballesty</a>	<b>General</b>	<p>The submitter puts forward the following concerns about infrastructure in the County having regard to the proposed increased housing targets:</p> <ul style="list-style-type: none"> <li>▪ There is currently a commuter crisis in Wicklow; there are significant capacity problems on the M11 / M50. Therefore while it is laudable to want to build more homes, if there is no transportation to employment then future problems are created.</li> <li>▪ Rail capacity is currently exceeded as evidenced by crammed trains; 80% of the Rosslare line is currently at risk from climate change.</li> <li>▪ The current proposed changes need to include the creation of facilities that will encourage local employment.</li> <li>▪ There are no specifics about the provision of local medical services, e.g. x-ray, injury clinic, minor procedures, stepdown facilities from centre of excellence hospitals.</li> <li>▪ There are no specific plans for the creation of educational facilities; expansion of 3<sup>rd</sup> level provision.</li> </ul> <p>The submitter concludes by putting forward that the planning of houses in isolation from services is negligent, and the stress suffered by the population is directly attributable to this.</p>
79	<a href="#">Glenveagh Homes Ltd.</a>	<b>General</b>	<p>The submission suggested that an updated 'settlement capacity audit' be carried out, to reflect advances in infrastructure provision since the adoption of the 2022 County Development Plan.</p>
96	<a href="#">Alan Richardson</a>	<b>General</b>	<p>It is submitted that mention of 'good transport links' in the review is a misnomer / inaccurate and there is a shortage of park &amp; ride facilities; the DART service is poor; the commuter rail service is the worst in the whole country and 'BusConnects' service is pathetic, erratic and under served.</p>
01 89 95	<a href="#">Leonie Hogan</a> <a href="#">Brien Vahey</a> <a href="#">Brien Vahey</a>	<b>North &amp; East Wicklow</b>	<p>The submissions listed raise some or all of the following issues with respect to north and east Wicklow area i.e.</p>

			<p>Bray, Enniskerry, Kilmacanogue, Greystones-Delgany, Kilcoole, Newtownmountkennedy, Ashford, Roundwood:</p> <ul style="list-style-type: none"> <li>▪ There needs to be a huge investment in transportation infrastructure in the area having regard to the congestion already present and the continued increase in car ownership</li> <li>▪ A framework for the development of community resources, library, community centres sports and parks is required</li> <li>▪ A 'place making' strategy is required for these towns given the current level of development being experienced and to ensure urban sprawl does not engulf the whole north of the County</li> </ul>
69	<a href="#">The Alliance of Bray Residents</a>	<b>Bray</b>	<ul style="list-style-type: none"> <li>▪ The Alliance put forward that it supports action necessary to provide sufficient housing, given the severity of the current housing crisis. However it requests this be done in a sustainable manner that is not detrimental to the community of Bray, as part of the solution to the chronic traffic problems of the town, and in a way that does not exacerbate the traffic problems.</li> <li>▪ The submission draws attention to the growth rate proposed for Bray, and flags that increases in the County's housing stock will require significant additional resources in planning for and providing the necessary supporting infrastructure, including transport and mobility planning and that Variation No. 6 should make provision for the necessary additional resources.</li> <li>▪ The submitters draw attention to a similar variation in DLR and request close cooperation between the two Councils, particularly with respect to transportation issues</li> <li>▪ ABR welcomes the commitment to the preparation of a comprehensive Area Based Transport Assessment (ABTA) and Local Transport Plan for Bray with funding from the NTA. It is put forward that it is critical that the additional housing included in Variation No. 6, and out to the 2040 planning horizon of the NPF, be factored into the ABTA for Bray and the resulting Local Transport Plan and LPP.</li> </ul>
113	<a href="#">Lee Mckeown</a>	<b>Bray</b>	<p>This submission puts forward that Bray is already overpopulated and has too much traffic and the Proposed Variation would allow more houses with the infrastructure to support same.</p>

116	<a href="#">Alison Wildes</a>	<b>Bray</b>	<p>The submission raises concerns with respect to the infrastructural and physical capacity of Bray to absorb new development: in particular coastal and fluvial systems (including the Dargle River), steep topography, limited transport corridors, and cumulative demands on established services. Concern with respect to wastewater and drainage systems, transport congestion, pollution from construction activity, pressure on social and community infrastructure, and increased exposure to flood risk and climate-related impacts are also raised.</p> <p>It is put forward that the Proposed Variation does not demonstrate how the revised housing target for Bray can be accommodated within existing or planned capacity over the relevant timeframe.</p>
83	<a href="#">Cliona Loughnane</a>	<b>Wicklow Town – Rathnew</b>	<p>The submission puts forward that while the need for additional housing is recognised, there is a pressing need to ensure we have the infrastructure to support existing and new residents. Particular reference is raised to underdeveloped public transport infrastructure in Wicklow town and Rathnew. It suggested that such services and infrastructure should be designed and delivered before, or at very least in close tandem, with additional housing.</p>
27	<a href="#">Derek Mitchell</a>	<b>Greystones-Delgany</b>	<p>The submissions listed raise some or all of the following issues with respect to infrastructure in Greystones-Delgany:</p> <ul style="list-style-type: none"> <li>▪ Additional housing in the settlement will require enhancements to public transport services, specifically improved DART and bus services, DART stabling infrastructure, improved DART and bus journeys times and timetable reliability</li> <li>▪ Additional housing in the settlement will require N/M11 improvement from M50 to Kilmacanogue</li> <li>▪ Additional housing in the settlement will require enhancements to schools and sports facilities</li> </ul>
01	<a href="#">Leonie Hogan</a>	<b>Kilcoole</b>	<p>The submissions listed raise some or all of the following issues with respect to infrastructure in Kilcoole:</p> <ul style="list-style-type: none"> <li>▪ The proposals to significantly increase the housing target for Kilcoole is not appropriate without a commensurate enhancement of transportation infrastructure; in particular bus and train services, and connectivity to the train station from the town;</li> <li>▪ The proposals to significantly increase the housing target for Kilcoole is not appropriate without a commensurate enhancement of social /</li> </ul>

			community health services (e.g. doctors / dentists) and education / school places (in particular secondary school places)
06	<a href="#">Dominique McMullan</a>	<b>Enniskerry</b>	<p>The submissions listed raise some or all of the following concerns with respect to infrastructure in Enniskerry:</p> <ul style="list-style-type: none"> <li>▪ The proposal to increase the housing target or housing densities for Enniskerry is not appropriate given existing infrastructure deficits</li> <li>▪ Particular deficits include: <ul style="list-style-type: none"> <li>- lack of a secondary school</li> <li>- lack of capacity in existing primary schools</li> <li>- lack of adequate healthcare and community facilities, for example lack of childcare, services for the elderly, facilities for children and teenagers</li> <li>- inadequate local road infrastructure, which already suffers congestion and safety issues</li> <li>- lack of adequate high capacity public transport or active travel infrastructure, particular the infrastructure required to connect Enniskerry to higher order services in locations such as Bray (e.g. secondary schools)</li> <li>- inadequate sports and recreational facilities</li> <li>- lack of a supermarket</li> <li>- insufficient car parking / car parking management</li> <li>- insufficient Garda support</li> <li>- inadequate water, wastewater and drainage capacity</li> </ul> </li> <li>▪ Increased density without improved transport infrastructure would result in an increase in car dependence and transport emissions; with impacts on the use of the area for recreation e.g. bike users and hill walkers</li> <li>▪ Mechanisms are needed to ensure that housing growth does not outpace community infrastructure capacity, including provision of essential day-to-day services.</li> </ul>
07	<a href="#">Anne Marie Carew</a>		
08	<a href="#">Aisling Woods</a>		
09	<a href="#">Catherine Nolan</a>		
10	<a href="#">Annika Schmaedeke</a>		
14	<a href="#">Orla Swan</a>		
17	<a href="#">Neassa Sugrue</a>		
21	<a href="#">Catherine Nolan</a>		
22	<a href="#">Flavio Colombo</a>		
24	<a href="#">Michelle Cronin</a>		
26	<a href="#">Friends of Knocksink Woods</a>		
28	<a href="#">Tina Roche</a>		
29	<a href="#">Brian Donnelly</a>		
31	<a href="#">Lorna Kelly</a>		
34	<a href="#">Gill Toal</a>		
38	<a href="#">Sally Phelan</a>		
39	<a href="#">Catherine Nunes</a>		
41	<a href="#">Rosemary Riordan</a>		
42	<a href="#">Rosemary Riordan</a>		
43	<a href="#">Paula Cantillon</a>		
44	<a href="#">Thomas Riordan</a>		
45	<a href="#">Edwina and Dale Allman</a>		
46	<a href="#">James Barry</a>		
47	<a href="#">Janet Sheehy</a>		
48	<a href="#">Marie Farron</a>		
49	<a href="#">Enniskerry GAA Club</a>		
50	<a href="#">John Henry Prosser</a>		
52	<a href="#">Malachy Quinn</a>		
53	<a href="#">Robert Neill</a>		
54	<a href="#">Joanne Coogan</a>		
55	<a href="#">Patricia Walker</a>		
59	<a href="#">Albert Smith</a>		
61	<a href="#">Dr. Graham McMullin</a>		
62	<a href="#">Caroline O'Callaghan</a>		
63	<a href="#">Zandra McMullin</a>		
66	<a href="#">Liz McMahon and Joe Wilson</a>		
67	<a href="#">Dave Casey</a>		
70	<a href="#">Aidan Harmon</a>		
72	<a href="#">Catherine O'Connor</a>		
76	<a href="#">Kilian Mullet</a>		
77	<a href="#">Ger Leonard</a>		
78	<a href="#">Nigel Pepper</a>		
80	<a href="#">Sorcha O'Keeffe</a>		
81	<a href="#">Carol Ann O'Keeffe</a>		

82	<a href="#">Patricia O'Keeffe</a>		
89	<a href="#">Brien Vahey</a>		
95	<a href="#">Brien Vahey</a>		
104	<a href="#">Sarah Leckie</a>		
107	<a href="#">Board of Eagle Valley Consolidated Management</a>		
111	<a href="#">Georgina Young</a>		
115	<a href="#">Rebecca Candon</a>		
112	<a href="#">Shane Stokes</a>	<b>Newtownmountkennedy</b>	The submission details a number of the infrastructure challenges arising in Newtownmountkennedy with particular focus on lack of employment opportunities locally resulting in high levels of commuting; poor public transportation infrastructure and take up; and education infrastructure. In light of same it is requested that the Council stick to the 2031 new targets rather than zoning land for additional development and requiring further units in excess of that. It is suggested that the Council addresses the current infrastructure imbalances in the town before further expansion.
117	<a href="#">Shane Stokes</a>		
16	<a href="#">Ashford GAA Club</a>	<b>Ashford</b>	<p>The submissions listed raise some or all of the following issues with respect to infrastructure in Ashford:</p> <ul style="list-style-type: none"> <li>▪ The proposal to increase the housing target must be accompanied by new social infrastructure.</li> <li>▪ Infrastructural improvements required include sports, recreation and community facilities</li> </ul>

**Opinion of the Chief Executive**

It is agreed that further infrastructural investment will be required to support the proposed increased levels of housing development.

The Council is committed to working with all local and state agencies to enhance infrastructure in the County. All of the State infrastructure agencies are aware of the new County targets, and many have made submissions to this process which outlines where in the County the growth is to be accommodated in the short to medium term (up to 2031).

The Council is committed to using its resources and to seek additional funding to ensure that infrastructure within its remit is or will be available to support new housing. All of the Council's strategies and plans fully support and promote the provision of enhanced infrastructure including social, community and sporting facilities.

With regard to the specific issues raised:

**Transport and Connectivity**

The concerns expressed with regard to the adequacy of transport infrastructure are noted.

The Council is committed to working with all local and state agencies to enhance transportation services in the County including (but not limited to): Transport Infrastructure Ireland with respect to the M/N11 and N81 (including park-and-ride projects), the National Transport Authority with respect to public transportation services and active travel

infrastructure, Iarnród Éireann with respect to rail services and Dublin Bus / Bus Éireann with respect to bus services. The Council will work also with adjoining Local Authorities on cross border transportation issues.

With respect to public transport infrastructure, key projects being progressed by the NTA, Iarnród Éireann and Dublin Bus / Bus Éireann for Wicklow include:

- DART + coastal extension; extending the DART to Wicklow Town
- ECRIPP coastal protection project
- Station enhancements
- Enhancing bus frequency, additional rural routes, N/M11 bus priority scheme

With respect to the NTA funded Active Travel programme, the budget allocation for 2026 for County Wicklow is €7m.

With respect to national roads, priorities for 2026 include:

- National Road Maintenance and Improvement; the following national road improvement schemes are currently progressing through the design and planning phases:
  - N11/M11 Bus Priority Interim Scheme
  - N11/M11 Strategic Bus Park & Ride (Junction 11 and Junction 16)
  - N81 Whitestown Lower Project and N81 Hangman's Bend and Tuckmill Project
  - M11 Strategic Bus Park & Ride (Junction 6)
  - N81 Rural Traffic Calming & Bus Stop at Hollywood
  - Road Safety Improvement Schemes (National Roads)
- Securing funding to progress the following schemes continues
  - N11/M11 Junction 4 to 14 Improvement Scheme
  - N81 Hollywood Cross to Tallaght Road Improvement Scheme

The Council will continue to invest in the improvement of transportation infrastructure within its own remit, in particular the improvement of regional and local roads, traffic management in towns, safety around schools etc. In this regard, the Council has allocated approx €33m of its 2026 budget to the roads and transportation function. The Roads and Transportation programme for 2026 includes (but is not limited to):

- Non-national road maintenance and improvement including carriageways and footpaths, reconstruction or resurfacing and winter maintenance
- Road Safety Engineering Improvement (15 locations planned for 2026)
- Bridge maintenance
- Public lighting improvements and maintenance
- Car parking maintenance and management, including bye-law reviews where required
- Road Safety Promotion and Education
- Southern Port Access Road, Arklow
- Chapel Road Delgany Pedestrian & Cycle Infrastructure Scheme, Delgany
- Blessington Inner Relief Road
- Enniskerry Village Renewal – Public Realm Upgrades Phase III

In particular with respect to local transportation concerns, the Council is committed to updating existing or preparing new **Local Transport Plans** in conjunction with the NTA for all large towns in the County i.e. Bray, Greystones-Delgany, Wicklow Town – Rathnew, Arklow and Blessington.

The Wicklow County Development Plan sets out a clear policy platform to support the delivery of new infrastructure and services where needed, and sets out numerous general and specific objectives with respect to infrastructural needs in the area. Wicklow County Council is committed to ensuring that new development is only permitted where the necessary infrastructure and services are or will be in place to service that development.

### **Education Infrastructure**

The Department of Education & Youth is responsible for school delivery. The Council is committed to working with the Department to ensure that the Department is aware of all housing development strategies / targets for the County and individual settlements and providing the Department with regular updates with respect to new housing developments granted, and developments commenced, so that it can plan for the educational needs of new residents. The Department has made a submission with respect to the Proposed Variation which can be viewed here: [Department of Education and Youth](#).

Minister for Education and Youth Hildegard Naughton on 28 January 2026 announced the publication of the NDP Sectoral Plan for the Education and Youth sectors. The NDP Sectoral Investment Plan involves a capital investment of €7.55bn in schools and Youth Sector for the 2026 to 2030 period.

It is set out that this €7.55bn funding will be used as follows:

- €5 billion of NDP funding to support prioritised project rollout to provide additional capacity and modernisation of facilities with strong special education dimension to all projects
- €2.25 billion of NDP funding to focus on supporting the existing school estate in terms of maintenance, minor works and ICT grant funding, Climate Action Summer Works Scheme, other climate programmes and also increased capital funding for the Youth Sector
- €0.3 billion to be used as a contingency fund for 2026 to 2030 period

### **Sports & Recreation**

The Council is committed to working with all local and state agencies to enhance sports, recreation and amenity facilities in the County. As part of the National Sports Policy, Wicklow County Council will be developing a Local Sports Plan for the County in 2026 (subject to funding), which will identify sports infrastructure needs as well as a project delivery programme for new facilities. This programme will build on the Sports & Recreation audits already carried out in each Municipal District.

Related to this, the Research and Innovation Unit in Sport Ireland is working with the Office of the Planning Regulator to improve the planning of sports facilities in Ireland. As part of the initial scoping for the project it has become clear that it requires a complete, comprehensive and validated audit of sports facilities in Ireland. The Research and Innovation Unit have developed an innovative digital facility auditing tool; the tool leverages existing open datasets to rapidly complete a county level audit of sports facilities for labelling and validation. Following a pilot audit of all facilities in South Dublin and Kildare, Wicklow Sports Partnership have agreed to allocate staff to carry out this audit for County Wicklow.

### **Community infrastructure**

The Council is committed to working with all local and state agencies to enhance community infrastructure in the County.

Audits of sports and recreation needs have been carried out for each MD and the Council is committed to using this information to develop programmes for infrastructure enhancement and addressing the needs for new facilities required as part of new housing developments.

County Wicklow has received €199,043.66 as part of the Local Enhancement Programme 2026. There will be a particular focus on small capital works/improvements, and the purchase of equipment for community use. The funding may be used for but is not limited to; improving access for persons with a disability; enhancing community participation for disadvantaged and marginalised groups and improving energy efficiency of community facilities to reduce ongoing costs. The scheme is designed to ensure local priorities are identified and met, to improve and enhance community facilities for all. Funding will be available to a diverse range of community groups including, but not limited to, community centres, parish halls and local voluntary groups.

In addition, community projects for 2026 include:

- Repurposing of Boghall Courthouse Bray as a community facility
- Improvements to Bog Meadow community facilities in Enniskerry
- Renovation of community centres in Donard, Kirikee and Lackan

With respect to libraries, improvement projects progressing include Aughrim Library, Ballywaltrim Library & HQ, Baltinglass Refurbishment, Blessington Reconfiguration and repairs in Dunlavin, Enniskerry and Greystones.

### **Local Authority Housing**

The Council is committed to ongoing delivery of its housing programme. The Local Authority has projects totalling c. 550 social housing units in progress at this time; another 200 units of 'affordable' housing are in various stages of delivery. In addition, the Council supports more than 1,500 household with support including RAS / HAP etc.

### **Health Services**

The provision of health facilities and GP surgeries are a matter for the Health Service Executive (HSE), however the Council endeavours to facilitate the provision of such facilities through flexible zoning provisions and development objectives / standards; in particular the development of new health care facilities that is supported in a wide range of land use zone categories.

### **Employment**

The Council is active in a wide range of programmes and projects aimed at enhancing economic opportunities and employment in the County, in conjunction with a range of state agencies such as the Department of Enterprise, Tourism and Employment, IDA, Enterprise Ireland, Wicklow LEO, including (but not limited to):

- Development of Wicklow County Campus at Clermont including providing education and enterprise space for facilities such as a Food Innovation Hub and Offshore Renewable Energy training
- Enhancement of Wicklow and Arklow harbours generally and to accommodate the planned Offshore Renewable Energy developments off the coast of County Wicklow
- Refurbishment of Wicklow Gaol
- Progressing development of employment sites at Rathdrum
- Development of a Remote Working / Community Hub in Carnew
- Traffic management in Laragh – Glendalough; including new park-and-ride, visitor centre
- Activation of Council owned lands at Mill Road Greystones for potential health centre and hotel development.

### **Town Centre Regeneration**

The Council is committed to working with local communities to improve and enhance our town centres, with a primary focus on establishing 'Town Teams' and developing 'Town Centre First' plans. There are now eight Town Teams established in County Wicklow: Arklow, Baltinglass, Blessington, Carnew, Greystones, Newtownmountkennedy, Rathdrum, and Wicklow. Work is ongoing in establishing further teams. Town Centre First Plans have been prepared for Blessington and Newtownmountkennedy. The Town Centre First Suite of Supports provides funding to strengthen local capacity, assess town needs, and prepare regeneration projects for future investment.

The town regeneration team is regularly developing new projects with communities and seeking funding for projects; live projects include:

- Blessington Town Centre regeneration - the development of plans for public realm works
- Baltinglass public realm improvement works
- Bray Harbour Regeneration

The provision of enhanced retail in towns is a matter for the market; however the Council endeavours to facilitate the provision of such facilities through flexible zoning provisions and supportive development objectives / standards.

### **Flood Risk Management**

The Council is active in a wide range of programmes and projects aimed at addressing flood risk and management surface water, in conjunction with a range of state agencies such as the OPW, Irish Rail (for coastal issues between Bray – Wicklow town), including (but not limited to):

- Arklow Flood Relief Scheme
- Avoca Flood Relief Scheme
- Aughrim catchment flood prevention works including future 'Spongeworks' project
- Coastal Erosion Studies
- East Coast Railway Infrastructure Protection Project (ECRIPP) with Iarnrod Eireann

### **Assessment of servicing status**

The assessment of servicing status has been carefully considered, utilising inputs for all state agencies and infrastructure departments of the Council. With respect to the assessment of 'serviceability', the CE is satisfied that identifying water services as the primary potential constraint is an appropriate approach, and that other issues affecting delivery such as site assembly, transportation / social infrastructure and surface water infrastructure requirements are not necessarily insurmountable development impediments in the majority of locations / sites. These are certainly matters that require attention and planning, and are for the most part evaluated and teased out during the local plan making process, before lands are zoned for significant or strategic development.

### **Chief Executive's Recommendation**

No change to Proposed Variation

## Topic 4 Zoning

The submissions to follow request the zoning of particular specific lands. The submissions are listed in order received.

No.	Name	Summary
11	<a href="#">Kismet Limited</a>	This submission requests a change in zoning of lands measuring c. 2.5ha at Ballinderry Road, Ballygannon, Rathdrum from Active Open Space to residential
12	<a href="#">Eileen and Roy Byrne</a>	This submission requests a change in zoning of lands measuring c. 8ha at Ballybeg, Rathnew from unzoned to residential
32	<a href="#">Clarke Family &amp; Ryecroft Ltd</a>	This submission requests a change in zoning of lands measuring c. 0.2ha at Rossana Lower, Rathnew from RN2 to RN1
33	<a href="#">Helen Clarke and Family</a>	This submission requests a change in zoning of lands measuring c. 1.4ha at Milltown North, Rathnew from RN2 to RN1
58	<a href="#">Liam Burke</a>	This submission requests a change in zoning of lands measuring c. 3.6ha at Dunlavin from unzoned to residential
71	<a href="#">Dwyer Nolan Developments Ltd</a>	This submission requests a change in zoning of lands measuring c. 8.2ha at Season Park, Newtownmountkennedy from 'Strategic Land Bank' to residential. It is also requested that lands measuring c. 8.2ha that is currently 'unzoned' and lands currently zoned 'Active Open Space' (3.2ha) be zoned 'Strategic Land Bank'.
79	<a href="#">Glenveagh Homes Ltd.</a>	This submission requests a change in zoning of lands measuring c. 14ha at Keatingstown in Wicklow Town from unzoned to residential.
87	<a href="#">Crowley Residential</a>	This submission requests a change in zoning of lands measuring c. 12.1ha at Dunbur Lower, in Wicklow Town from unzoned to residential.
90	<a href="#">Glenturas Construction Ltd &amp; Clouddale Ltd</a>	This submission requests a change in zoning of lands measuring c. 43ha at Ballyguile Beg and Ballyguile More in Wicklow Town from unzoned to residential.
99	<a href="#">Dunmoy Properties Ltd</a>	This submission requests a change in zoning of lands measuring c. 17ha at Burgage Blessington from 12ha zoned RE, E, PU and AG and 5ha unzoned to residential.
101	<a href="#">Brookhampton Limited</a>	This submission requests a change in zoning of lands measuring c. 10ha at Kilcoole from SLB / unzoned to residential.
102	<a href="#">Maguire Family</a>	This submission requests a change in zoning of lands measuring c. 9ha at Monastery Enniskerry and c. 4ha at Parknasilloge Enniskerry from unzoned to residential.
105	<a href="#">D/RES Properties and The Evans Family</a>	This submission requests a change in zoning of lands measuring c. 63ha at Charlesland, Greystones from AOS to residential.
106	<a href="#">Avonvard Ltd</a>	This submission requests a change in zoning of lands measuring c. 3.75ha at Vevay Road – Boghall Road, Bray from MU to residential.

### Opinion of the Chief Executive

#### Phasing (RN1, RN2)

The following new objectives is proposed as part of the Proposed Variation:

#### **Core Strategy Objective 1**

*All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands*

*will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.*

Therefore there is no necessity to instigate a zoning 'change' to RN2 lands as via this change, RN2 lands would be considered the same in planning terms to RN1 lands. The CS Objective 1 detailed above, would if adopted, supersede any objective with respect to phasing / prioritisation in any local plan.

### **New zoning requests**

The Proposed Variation entails revisions to 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 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).

The Proposed Variation does not relate to the amendment of any zoning objectives / provisions in County Wicklow; in particular it does not relate to the potential zoning of new lands for residential development or the extension of settlement boundaries, but rather it relates primarily to revising the housing targets for various settlements / areas within County Wicklow as set out in the Wicklow Core Strategy.

The Proposed Variation does not suggest or 'bring forth' additional lands for zoning, as it is demonstrated in the tables set out in the Proposed Variation that there is adequate zoned land in the short to medium term to accommodate the new housing targets.

It is recognised in the Proposed Variation that there would not be adequate zoned and serviced lands in the County's settlements to meet the longer term housing targets beyond 2031. Wicklow County Council is committed to addressing this shortfall and in order to determine where there might be serviced / serviceable landholdings with interested owners, Wicklow County Council is separately running a '**Call For Sites**' consultation seeking expressions of interest from landowners for the future potential zoning of land for residential use and / or the extension of settlement boundaries.

As the public has very explicitly been advised that this variation process is not related to zoning, it is considered it would be inappropriate and unjust at this stage to change this variation into a re-zoning exercise, as those members of the public that correctly did not make a submission to Variation 6 but wish their land to be considered for zoning, would have been disenfranchised and excluded from consideration in this process.

This two stage process is considered the most appropriate as it allows for a rapid amendment to the County Development Plan to allow already zoned and serviced land to come forward immediately by removing any policy blockages, while allowing for more careful consideration of new zoning requests to be carried out thereafter and consultation with the public and elected members.

### **Chief Executive's Recommendation**

No change to Proposed Variation

## Topic 5 Other

The submissions to follow raise additional issues with respect to the Proposed Variation not covered in the topics above. The submissions are grouped as follows:

- 'general' which means the submission is relating to a non-specific location
- 'location' i.e. they raise issues with respect to a specific area / settlement (listed in order of settlement hierarchy)

No.	Name	Subject	Issue raised
88	<a href="#">Ballymore Group</a>	General	<ul style="list-style-type: none"> <li>▪ The submitter is disappointed that the opportunity to remove Objective 6.2 from the CDP (related to a blanket ban on institutional investors) has not been taken as part of this variation. It is put forward that this objective is contrary to Government policy as set out in Housing for All and acts as a choke on housing supply, putting further pressure on private tenants competing for scarce private rental accommodation.</li> <li>▪ The submitter questions the text changes proposed to Section 6.1 of Chapter 6 and in particular question the need to remove references to renting, which is flagged as an important part of the housing tenure mix.</li> </ul>
94	<a href="#">BBA Architecture</a>	General	<p>It is suggested that <b>Core Strategy Objective 1</b> be amended as follows in order that phasing and sequencing shall not be a constraint on development as directed by the Minister's letter of 11th December 2025, to the Chief Executive of Wicklow County Council:</p> <p><i>All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively and equally for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.</i></p>
109	<a href="#">Cairn Homes</a>	General	<ul style="list-style-type: none"> <li>▪ This submission expresses concern that current planning policy regarding Sequential Assessment remains unaltered; that this sequential policy has the potential (particularly through Third Party Objections to development) to undermine the intent and spirit of the NPF Implementation Guidelines (2025) or the Development Plan Guidelines (2022);</li> <li>▪ The submission requests that the Variation includes an additional 'Core Strategy Objective 4' as follows: <i>In the context of the urgent need to increase housing supply the application of the Sequential Approach under policy 6.3.2, 6.3.4 and CPO 6.19 shall be applied with flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.</i></li> </ul>

103	<a href="#">Seana Kevany</a>	<b>Public Consultation</b>	This submission puts forward that Proposed Variation was not adequately publicised in a manner consistent with genuine, meaningful public consultation.
116	<a href="#">Alison Wildes</a>	<b>Public Consultation</b>	This submission puts forward that Proposed Variation was not adequately publicised and therefore the obligations provided for under the Aarhus convention on public participation may not have been fulfilled.
69	<a href="#">The Alliance of Bray Residents</a>	<b>Bray</b>	<p>The submitters welcome the commitment in Variation No. 6 to include in the CDP the Local Planning Framework (LPF) for Bray MD (including Enniskerry and Kilmacanogue) when adopted.</p> <p>However they consider that placing Bray last in the order of priority for the preparation of the outstanding LPFs for the County is a mistake (Chapter 3.4 of Variation No. 6), given that Bray is the largest town in the county and the only NPF Level 1 (Metropolitan Area Key Town) in the county.</p> <p>They feel strongly that a firm and prompt timeline for the adoption of the LPF for Bray, including the framework for consultation with the local community, should be included in Variation No. 6.</p>
73	<a href="#">Silverbow Ltd</a>	<b>Bray</b>	The submission requests that Map No. 2 'Land Use Zoning' and key development objectives maps from the Bray MD LAP 2018–2024 be incorporated into the WCDP 2022-2028 as part of Variation 6.
74	<a href="#">Borg Developments and Cairn</a>	<b>Bray</b>	<p>The submission requests:</p> <ul style="list-style-type: none"> <li>▪ the clearer incorporation of the Bray MD LAP and associated zoning into the County Development Plan</li> <li>▪ the omission of policies or objectives from the WCDP which would apply a sequential or phased approach to development / grant of permissions of residential zoned lands required for updated core strategy housing growth requirements. It is submitted that a number of objectives and standards in the WCDP, relating to phasing of residential development, currently frustrate the achievement of Core Strategy targets and conflict with Core Strategy Objective 1 which states that all residential zoned lands will be supported for development in the lifetime of the current plan.</li> <li>▪ This submission specifically makes reference to Fassaroe in relation to these matters</li> </ul>
88	<a href="#">Ballymore Group</a>	<b>Bray</b>	<ul style="list-style-type: none"> <li>▪ The submitter urges the Council to prepare a Variation of the CDP to include a zoning map for Bray as a matter of the highest priority.</li> <li>▪ It is submitted that there is an error in the proposed text changes to Chapter 1 in the Proposed Variation in that there is not currently a LPF for the Bray MD.</li> <li>▪ It is put forward that ACP has confirmed that the existing Bray MD LAP has lapsed and consequently, there is no zoned land in Bray. It is requested that this urgently be addressed without delay.</li> </ul>

			<ul style="list-style-type: none"> <li>With respect to proposed text changes to Chapter 3 in the Proposed Variation, it is suggested that the deletion of the word 'area' from the term 'local area plan' (i.e. to become just 'local plan') would not be appropriate given that the only mechanism for the zoning of land is through the CDP or LAP, and there is no mechanism to zone land in any other type of plan.</li> </ul>
100	<a href="#">Fassaroe Developments Ltd</a>	<b>Bray</b>	<ul style="list-style-type: none"> <li>The submitter welcomes in principle the revised wording for Section 3.4 with respect to LAPs and LPFs but suggests the wording could be updated to avoid any confusion as to the ongoing status of the LAPs until they are replaced with the Local Planning Frameworks in the near future.</li> <li>In this regard it is suggested that (1) the full names of existing LAPs be added to the text of Section 3.4; (2) the word 'current' is replaced with 'most recent'; (3) the zoning map for Bray MD be included in the County Development Plan via this variation.</li> </ul>
106	<a href="#">Avonvard Ltd</a>	<b>Bray</b>	It is requested that WCC incorporate the zoning map for Bray into the Development Plan as part of the variation
27	<a href="#">Derek Mitchell</a>	<b>Greystones-Delgany</b>	<p>The submission relates to Table 3.3 'Wicklow Settlement hierarchy'. It is put forward that the description of Greystones should be more akin to a category 4 town rather than category 3 town due to its low employment base.</p> <p>In support of this suggestion, it is put forward that:</p> <ul style="list-style-type: none"> <li>Greystones has the lowest ratio of locally employed residents of any settlement in Wicklow. This has been the case for 30+ years in spite of significant land being zoned for commercial.</li> <li>Category 4 towns refer to a weak employment base and this should be referred to in the 'Description' of Category 3</li> <li>Owners of these land have lobbied to have the zoning changed to residential and have not tried to develop jobs. It should be made clear that developing jobs is a major planning priority.</li> <li>Category 4 settlements also state they 'require targeted 'catch-up' investment to become more self-sustaining'. This should also be included in the description of Greystones-Delgany in view of the rapid recent growth.</li> </ul>
75	<a href="#">Leddy Family</a>	<b>Enniskerry</b>	This submission requested that Enniskerry be recognised as a natural extension of the Dublin Metropolitan Area, with strong connection to Bray – Fassaroe and new development communities in DLR.

## Opinion of the Chief Executive

### **Topic: Chapter 1/ 3**

#### **Bray**

The Proposed Variation provides text amendments reflecting the fact that existing LAPs, including the Bray MD LAP, remain in effect until replaced (a position that is support by legal advice) and form part of the County Development Plan. This is considered to be the situation prevailing at this time, and at the time of the adoption of the County Development Plan in 2022 and the re-statement / clarification set out in the proposed amendments to Chapter 1 and Chapter 3 which form part of this Proposed Variation are to ensure that all are clear on this issue and there is no questioning of the validity of these current LAPs.

There is no provision in law for LAPs to 'expire' and the CE is satisfied therefore that any existing LAPs are correctly described as 'current'. There is no suggestion that there is already a Bray MD LPF, but rather it is clarified that there is currently a Bray MD LAP.

The CE is committed to the preparation of an updated local plan for Bray MD, along with the preparation of a Local Transport Plan. The current LAP remains in force until it is replaced and the CE is generally satisfied that at this time it remains an adequate framework for the short term future development of Bray and the wider district.

The listing of the order of local plan reviews in Chapter 3 was reflective of the need arising for new local plans having regard in particular to the passage of time since a plan has been prepared for each settlement upon adoption of the County Development Plan in 2022. The Bray MD LAP, being one of the more recently adopted local plans at that time, therefore was lower on the order listed; but this was not intended to be a reflection of any lesser importance of the area to the County. The Bray LPF is under preparation in 2025-2026 with a view to the draft LPF being published in 2026, now that the Local Transport Plan is being commissioned.

It is not considered necessary to amend the Proposed Variation by insertion of the Bray MD LAP and associated maps into the County Development Plan by way of a formal alteration to the Proposed Variation, or to add any further clarification text. The CE is happy to append the existing LAPs (including their associated maps) onto the County Development Plan webpage with the text such as '*These are the current LAPs that form part of this County Development Plan*'.

#### **Greystones-Delgany**

The change proposed to Table 3.3 in the Proposed Variation is only to correct an error in the adopted County Development Plan whereby Greystones-Delgany was incorrectly labelled in one table as being a '**Core Region**' settlement rather than a '**Metropolitan Area**' settlement, which it is via the RSES.

No actual change to Greystones-Delgany's position in the hierarchy or designation / description (which comes from the RSES) is proposed.

Therefore the suggested text change i.e. changing the description of Greystones-Delgany from: *Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good*

*transport links and capacity for continued commensurate growth to become more self-sustaining' to '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 would be a new change that was not proposed as part of the Proposed Variation and is not considered appropriate in the absence of an overall review of the settlement hierarchy and the role / description of all settlement therein. This is considered an exercise more appropriate for the overall review of the County Development Plan.*

With respect to the sentiments expressed that the focus for Greystones-Delgany should be 'catch up' investment and jobs growth, this is clearly set out in the Greystones-Delgany and Kilcoole LPF which states:

*"While the 'growth town' designation would suggest that significant new population growth is planned for Greystones – Delgany for the duration of the County Development Plan, in fact this designation is intended to reflect the growth that has already occurred in the 2016-2025 period having regard to housing development completed, underway and due for completion within this timeframe. The focus during the period of this LPF therefore will be on the provision of 'catch up' infrastructure to match this significant residential growth and with respect to further residential development, will be on infill development and consolidation of the built up area",*

*"To facilitate and support the highest degree possible, all forms of employment creation on appropriately zoned land and to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets of the town in order to stimulate further employment within the area",*

*"To facilitate and support the development of large-scale employment generating development on the Strategic Employment lands at Mill Road – Killincarrig".*

## **Topic: Chapter 6**

### **Objective 6.2**

Objective 6.2 of the County Development Plan was proposed and adopted by the elected members of Wicklow County Council as part of the making of the 2022 County Development Plan. This objective was not challenged by the Minister at that time and has been upheld on appeal by ACP. No changes are therefore proposed to this objective as part of this Proposed Variation.

### **Proposed Text Changes**

The Proposed Variation proposes to change the text in Section 6.1 as follows:

*The NPF warns against the intensification of social housing in areas that are already dense with social housing and advocates for the development of diverse neighbourhoods with a balance of public and private housing to create healthy communities. The NPF states that in addition to the significant investment in social housing we also need to ensure that more affordable homes. ~~are built for sale or rent, particularly in our cities, towns and villages, enabling people to choose to live within their communities and closer to where they work.~~ It indicates that this will be facilitated through more proactive land management and coordinated and efficient provision of enabling infrastructure, particularly on ~~publicly local authority and State~~-owned lands, as well as providing flexibility on design and density, particularly in our urban cores, to enable more cost-efficient construction and provide a variety of homes aimed at first-time buyers.*

A submission has questioned the need to delete the highlighted text and in particular question the need to remove references to renting, which is flagged as an important part of the housing mix. These changes are proposed to more closely align with the text with the NPF. The text change does not in any way alter or diminish the role of renting in the housing mix and in fact no distinction is made between ownership or renting.

The CE welcomes that a submission has flagged this text as it is considered that it could be modified slightly to better align with the revised NPF.

*The NPF warns against the intensification of social housing in areas that are already dense with social housing and advocates for the development of diverse neighbourhoods with a balance of public and private housing to create healthy communities. The NPF states that in addition to the significant investment in social housing we also need to ensure that more affordable homes. ~~are built for sale or rent, particularly in our cities, towns and villages, enabling people to choose to live within their communities and closer to where they work.~~ **are provided in our urban areas as part of the creation of mixed-tenure communities.** It indicates that this will be facilitated through more proactive land management and coordinated and efficient provision of enabling infrastructure, particularly on ~~publicly local authority and State-owned~~ lands, as well as providing flexibility on design and density, particularly in our urban cores, to enable more cost-efficient construction and provide a variety of homes aimed at first-time buyers.*

### **Objectives regarding sequential development**

The County Development Plan provides for a wide number of provisions / objectives / standards relating to the appropriate management of new development, including objectives with regard to the preferred phasing / sequencing of development.

The CE is satisfied that there is no inherent conflict between new Core Strategy Objective 1 and these provisions / objectives / standards, as applications for new housing are assessed on case-by-case basis on their own merits, against a range of development objectives and standards, and the proposed new CS1 objective will allow all residentially zoned sites, whether they be designated 'P1' or 'P2' to be assessed against all of these requirements on an equal footing.

In particular, in the context of the Government's stated urgent need to increase housing delivery, it is clarified that proposed new CS Objective 1 will supersede<sup>8</sup> the following objectives in local plans (which will be removed as a 'change consequent' to the making of this variation):

#### **Wicklow Town – Rathnew LAP: WTR4**

*Notwithstanding the zoning / designation of land for new residential development (RN), permission will not be considered for RN2 Priority 2 lands unless the following conditions are satisfied:*

- *75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.*

<sup>8</sup> Section 18(4) (b) of the PDA 2000 - A local area plan may remain in force in accordance with paragraph (a) notwithstanding the variation of a development plan or the making of a new development plan affecting the area to which the local area plan relates except that, where any provision of a local area plan conflicts with the provisions of the development plan as varied or the new development plan, the provision of the local area plan shall cease to have any effect.

**Blessington LAP: BLESS7**

Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following two conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated) or after 3 years following adoption of the LAP, less than 50% of the RN1 lands have been activated;
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.

**Greystones-Delgany and Kilcoole LPF: GDK16**

Notwithstanding the zoning / designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following conditions are satisfied:

- At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the application being significantly breached.

With respect to concerns raised specifically regarding Fassaroe, it is not considered that a contradiction is presented by Objective CPO 6.19 as the County Development Plan already states (and it is not proposed to alter this provision):

**Principle 4: Sequential approach**

The priority locations for new residential development will be:

**Priority 1** In the designated 'town' and 'village' / 'neighbourhood centres' or 'primary zone' through densification of the existing built up area, re-use of derelict or brownfield sites, infill and backland development. In doing so, cognisance will be taken of respecting the existing built fabric and residential amenities enjoyed by existing residents and maintaining existing parks and other open areas within settlements.

**Priority 2** Strategic Sites as identified by the RSES and associated MASP

**Priority 3** Infill within the existing built envelope of the town, as defined by the CSO Town boundary

**Priority 4** Where a need for 'greenfield' residential development is identified, the 'two-tier approach' to land zoning as set out in the NPF will be taken

Fassaroe explicitly falls with Priority 2, having regard to its identification in the RSES and MASP as a Strategic Development Area (Table 5.1 of the RSES). This is clearly one of the acceptable 'exceptions' to the sequential development objective.

While it is noted that ACP in a recent decision considered that the development at Fassaroe did not adhere to sequential development principles set out in the County Development Plan notwithstanding the above, it appears that the Inspector may have made an error in this assessment in that they set out that there was a 'significant extent of developed land between the site and town centre' which is erroneous. Wicklow County Council will continue to support the development in the immediate term of Fassaroe and in the preparation of the new Bray MD LPF, will consider whether new text / supporting objectives are required to further clarify the position.

**Topic: Metropolitan Area definition**

The defining of the Dublin Metropolitan area is a function of the Regional Assembly and RSES. This is currently under review and any request for redefining areas should be made through that process.

**Topic: Terminology**

The term 'local plan' is proposed to be utilised moving forward given that there are a range of plan 'names', all legally adopted, for localised plans, including 'Local Area Plan' (made under Section 20 of the PDA 2000) and 'Town Plans', 'Land Use & Tourism Plans' and 'Local Planning Frameworks' (all made under Section 12 or 13 of the PDA).

**Topic: Public Consultation**

The Proposed Variation has been in preparation since the publication of the new Guidelines July 2025 and it had been raised at Council meetings in October and November 2025 and discussed at the Planning Strategic Policy Committee in September and December 2025. In addition, a number of workshops were held with the elected members in relation to same in November 2025.

The Proposed Variation was placed on public display before the end of the year, at the request of the Minister. The Proposed Variation was published on 05 December 2025, a number of weeks before Christmas in order to ensure that interested parties would have enough time before the traditional holidays to consider same. In addition, additional time was added on to the minimum consultation period to allow for adequate time post Christmas for the public to review and consider the Proposed Variation.

Notice of the Proposed Variation was published in all local papers in advance of 05 December 2025, on the Council's website and promoted on all Council social media accounts. In addition, it was raised across a number of Facebook 'local forums' through the County. Articles also appeared on in local papers on 11 November 2025 and on local radio stations on 12 January 2026.

**Chief Executive's Recommendation****Amend the Proposed Variation as follows:****Recommendation 4****Chapter 6, Section 6.1**

*The NPF warns against the intensification of social housing in areas that are already dense with social housing and advocates for the development of diverse neighbourhoods with a balance of public and private housing to create healthy communities. The NPF states that in addition to the significant investment in social housing we also need to ensure that more affordable homes. ~~are built for sale or rent, particularly in our cities, towns and villages, enabling people to choose to live within their communities and closer to where they work.~~ **are provided in our urban areas as part of the creation of mixed-tenure communities.** It indicates that this will be facilitated through more proactive land management and coordinated and efficient provision of enabling infrastructure, particularly on ~~publicly local authority and State~~-owned lands, as well as providing flexibility on design and density, particularly in our urban cores, to enable more cost-efficient construction and provide a variety of homes aimed at first-time buyers.*

## Part 4.4 Submissions relating specifically to SEA and AA Screening

### 4.4.1 General

No.	Name
51	<a href="#">Wicklow Planning Alliance</a>
112	<a href="#">Shane Stokes</a>
117	<a href="#">Shane Stokes</a>
Issues Raised	
<p>Concern raised that the SEA does not adequately assess the impact of increasing the number of housing units as proposed, for the following reasons:</p> <ul style="list-style-type: none"> <li>- Each new house means another car on the N11 as the public transport services are not a substitute in terms of time or comfort. The N11/M50 are at a limit and congestion reaching a tipping point with potential future social disruption;</li> <li>- The inevitable increase in carbon emissions is not adequately addressed</li> <li>- Potential conflicts with climate adaptation measures including those relating to flood risk management is not adequately addressed and mitigated.</li> </ul>	
103	<a href="#">Seana Kevany</a>
Issues Raised	
<p>It is put forward that the SEA screening determination conclusion is not credible given:</p> <ul style="list-style-type: none"> <li>- the scale of housing uplifts now assigned to already constrained settlements;</li> <li>- the cumulative and in-combination effects of increased density, transport demand, wastewater loading, flood risk, and climate adaptation pressures; and</li> <li>- the rollback, dilution, or sidelining of previously adopted biodiversity and environmental commitments contained in the Wicklow County Development Plan 2022–2028.</li> </ul> <p>Screening out SEA at this stage removes the only strategic mechanism for examining cumulative environmental effects before decisions harden downstream.</p>	
116	<a href="#">Alison Wildes</a>
Issues Raised	
<p>The submitter notes that both Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) were screened out for Proposed Variation No. 6, meaning that no full environmental assessment was undertaken at this stage. They raise concern in relation to same given that SEA is specifically designed to apply to plans and programmes, or to anything that functions as a plan, regardless of what it is called.</p> <p>It is put forward that Proposed Variation No. 6 materially increases housing targets across the county, including a significant uplift for Bray; it strengthens delivery-focused policy language and alters the strategic context within which future planning decisions will be made and therefore in substance, this functions as a plan with real environmental consequences.</p> <p>They submit that the decision to screen out SEA and AA raises serious questions:</p> <ul style="list-style-type: none"> <li>• How can a variation of this scale and consequence fall outside the scope of strategic environmental assessment?</li> <li>• What safeguards exist to ensure that environmental considerations are not simply bypassed through procedural categorisation?</li> <li>• Is the intention to defer environmental resolution to later stages, or to avoid it entirely?</li> </ul> <p>The submitter is concerned that the screening-out of SEA and AA is not merely a deferral of environmental safeguards but may in practice serve to circumvent them altogether; that this would undermine the purpose</p>	

of strategic assessment, which is to examine cumulative and in-combination effects at the stage where meaningful choices can still be made.

#### **Opinion of the Chief Executive**

The potential environmental impacts associated with the development of zoned lands in County Wicklow has already been fully assessed through the SEA process that was carried out when these lands were zoned, including for example carbon emission impacts, flood impacts and social impacts. In all cases, whether the land was zoned through the County Development Plan or a local plan, full SEA was carried out in accordance with legislation and guidelines, by qualified and experienced environmental practitioners, subject to the inputs of prescribed environmental authorities.

These processes all concluded that taking into account the measures that have been integrated into the existing County Development Plan and any local plans, that provide for and contribute towards environmental protection, environmental management and sustainable development, that any potential effects arising from the plan would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse).

The Proposed Variation does not entail the zoning of any additional land in the County. It does not entail significantly increasing the density permissible on existing zoned land, as the densities detailed in the Proposed Variation are already permissible under the County Development Plan and Ministerial density guidelines which have been issued since the County Development Plan was adopted in 2022, said guidelines also being subject to necessary environmental assessments. It is considered therefore that any impacts arising from the Proposed Variation have already been considered and addressed by previous SEAs carried out, and therefore the need for further stages of SEA has not been established.

#### **Chief Executive's Recommendation**

No change to SEA Screening; no grounds for further stages of SEA.

**4.4.2 Bray specific**

No.	Name
103	<a href="#">Seana Kevany</a>
<b>Issues Raised</b>	
<ul style="list-style-type: none"> <li>▪ The Appropriate Assessment screening determination concludes that Stage 2 Appropriate Assessment is not required. This is particularly concerning given Bray’s proximity to sensitive coastal, riverine, and downstream Natura 2000 sites, and the scale of existing and proposed coastal and marine development affecting the Wicklow coastline, including offshore renewable energy projects, associated landfall works, and multiple Marine Area consents and Marine Usage Licences granted along the coast.</li> <li>▪ These include projects affecting or adjacent to Bray Head SAC, The Murrough SAC and SPA, and Wicklow Reef SAC. Deferring in-combination effects to later stages, after housing quantum is fixed, inverts the precautionary purpose of plan-level assessment required under Article 6(3) of the Habitats Directive.</li> <li>▪ Bray is a coastal settlement with a constrained river corridor, floodplain sensitivity, and downstream marine receiving waters, all of which materially limit its environmental carrying capacity. Increased housing targets at Core Strategy level will inevitably intensify pressure on the Dargle catchment and its tributaries through increased surface water runoff, wastewater loading, construction disturbance, and urban pollution pathways.</li> <li>▪ These pressures do not arise from any single development in isolation, but accumulate incrementally over time, increasing flood risk, degrading water quality, and reducing ecological resilience in both freshwater and coastal environments. Screening out Strategic Environmental Assessment and Appropriate Assessment at this stage fails to examine these in-combination and downstream effects, despite their foreseeability and strategic relevance. Once higher housing numbers are fixed, the opportunity to avoid or meaningfully mitigate such impacts is substantially reduced, particularly in a town where physical expansion options are limited and climate-related flood risk is already increasing.</li> <li>▪ In addition, multiple recent and ongoing large-scale residential, infrastructural, and commercial developments in and around Bray have already pushed local environmental systems to or beyond their sustainable limits, particularly in relation to the river corridor, floodplain function, wastewater capacity, and coastal receiving waters. Despite this, the Bray Biodiversity Action Plan is not referenced or integrated into the Proposed Variation or its environmental screening, and no account is taken of existing cumulative pressures.</li> <li>▪ This omission is inconsistent with the requirements of the Aarhus Convention, the Habitats Directive, the EIA Directive, and the Environmental Liability Directive, all of which require early, transparent assessment of environmental risk, meaningful public participation, and the application of the precautionary principle and polluter-pays principle at plan-making stage, rather than deferring impacts to later, project-by-project resolution.</li> </ul>	
116	<a href="#">Alison Wildes</a>
<b>Issues Raised</b>	
<p>The submitter puts forward that while Proposed Variation No. 6 is framed as strategic and non-spatial, the scale of the revised housing targets for Bray has clear knock-on cumulative effects that warrant explicit consideration at Core Strategy stage; and that increasing housing numbers without parallel strategic assessment risks compounding pressures across multiple interconnected systems.</p> <p>It is put forward that:</p> <p>Environmental and biodiversity impacts may include but not limited to:</p> <ul style="list-style-type: none"> <li>• increased pressure on coastal, estuarine, and riverine environments,</li> <li>• incremental habitat disturbance and fragmentation,</li> <li>• indirect impacts on protected species, and</li> </ul>	

- reduced ecological resilience under intensified development pressure.

Pollution and environmental quality concerns include but not limited to:

- additional wastewater and surface water loading,
- diffuse pollution from construction and urban activity, and
- cumulative air quality and noise impacts linked to increased traffic and servicing demands.

Infrastructure and services pressures include but not limited to:

- strain on wastewater and drainage systems,
- transport congestion,
- pressure on social and community infrastructure, and
- increased exposure to flood risk and climate-related impacts where development intensifies within constrained catchments.

It is suggested that deferring consideration of these cumulative impacts to later plan-making or development management stages reduces the opportunity to shape growth in a coordinated, preventative, and genuinely sustainable manner.

### Opinion of the Chief Executive

The potential environmental impacts associated with the development of zoned lands in Bray specifically has already been fully assessed through the SEA process that was carried out when these lands were zoned, including biodiversity / ecological impacts, coastal / marine/ riverine impacts, flood impacts and pollution impacts. In all cases, whether land was zoned through the County Development Plan or a local plan, full SEA was carried out in accordance with legislation and guidelines, by qualified and experienced environmental practitioners, subject to the inputs of prescribed environmental authorities.

These processes all concluded that taking into account the measures that have been integrated into the existing County Development Plan and any local plans, that provide for and contribute towards environmental protection, environmental management and sustainable development, that any potential effects arising from the plan would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse).

The Proposed Variation does not entail the zoning of any additional land in Bray. It does not entail significantly increasing the density permissible on existing zoned land, as the densities detailed in the Proposed Variation are already permissible under the County Development Plan and Ministerial density guidelines which have been issued since the County Development Plan was adopted in 2022, said guidelines also being subject to necessary environmental assessments. It is considered therefore that any impacts arising from the Proposed Variation have already been considered and addressed by previous SEAs carried out, and therefore the need for further stages of SEA has not been established.

As part of the Bray MD LAP, Stage 2 Plan AA was carried out in accordance with legislation and guidelines, by qualified and experienced environmental practitioners, subject to the inputs of prescribed environmental authorities.

This process concluded, subject to mitigation (detailed to follow), that the in light of the best scientific knowledge, it can be determined that the zoning would not give rise to effects on the integrity of any Natura 2000 site (European Site), having regard to their conservation objectives and either alone or in-combination with other plans, programmes or projects.

The Wicklow County Development Plan 2022 provides for the following mitigation objectives to address the potential for effects on European Sites:

**CPO 17.4**

*To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).*

*To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:*

- *EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019);*
- *National legislation, including the Wildlife Acts 1976 and 2010 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection order 2015;*
- *National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);*
- *Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same);*
- *Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan; Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.*

**CPO 17.5**

*Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan.*

**CPO 17.6**

*Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.*

**Chief Executive's Recommendation**

No change to SEA Screening; no grounds for further stages of SEA.

#### 4.4.3 Enniskerry specific

No.	Name
07	<a href="#">Anne Marie Carew</a>
21	<a href="#">Catherine Nolan</a>
24	<a href="#">Michelle Cronin</a>
26	<a href="#">Friends of Knocksink Woods</a>
28	<a href="#">Tina Roche</a>
31	<a href="#">Lorna Kelly</a>
34	<a href="#">Gill Toal</a>
38	<a href="#">Sally Phelan</a>
39	<a href="#">Catherine Nunes</a>
41	<a href="#">Rosemary Riordan</a>
43	<a href="#">Paula Cantillon</a>
44	<a href="#">Thomas Riordan</a>
45	<a href="#">Edwina and Dale Allman</a>
47	<a href="#">Janet Sheehy</a>
52	<a href="#">Malachy Quinn</a>
53	<a href="#">Robert Neill</a>
55	<a href="#">Patricia Walker</a>
61	<a href="#">Dr. Graham McMullin</a>
62	<a href="#">Caroline O'Callaghan</a>
63	<a href="#">Zandra McMullin</a>
66	<a href="#">Liz McMahon and Joe Wilson</a>
72	<a href="#">Catherine O'Connor</a>
77	<a href="#">Ger Leonard</a>
78	<a href="#">Nigel Pepper</a>
80	<a href="#">Sorcha O'Keeffe</a>
81	<a href="#">Carol Ann O'Keeffe</a>
82	<a href="#">Patricia O'Keeffe</a>
<b>Issues Raised</b>	
<p>The submitters raise some or all of the following issues:</p> <p>The submitters submit that they disagree with Wicklow County Council's SEA Screening conclusion i.e. <i>'In making the determination, the information contained in the Screening for SEA Report (including information provided by environmental authorities and an examination of the need to undertake SEA against relevant criteria set out in Schedule 2A 'Criteria for determining whether a plan is likely to have significant effects on the environment' of the above Regulations) is being taken into account. That information has been carefully considered and its reasoning and conclusion agreed with and adopted – allowing a determination to be made that Proposed Variation No. 6 would not be likely to result in significant environmental effects'</i>.</p> <p>The submitters state that they disagree with Wicklow County Councils Appropriate Assessment Screening conclusion i.e.</p> <p><i>"It is considered that the Proposed Variation No. 6 will not cause any significant direct, indirect, or cumulative impacts on this site in terms of reduction in habitat area, disturbance to key species, habitat or species</i></p>	

*fragmentation, reduction in species density, or changes in key indicators of Conservation Value (water quality, etc.)."*

In support of their submission, they set out that:

- Latest evidence produced for submissions to various planning applications to lands at Parknasilloge, Kilgarron, Enniskerry (AA2 lands), which slope down to Knocksink Woods, SAC indicate that these lands, with their particular hydrological regimes and the geometry of the subsoils, have been proven to be particularly complex.
- Independent Hydrologist expert, Dr. Robert Meehan (EurGeol, B.A. Ph D., Pgeo) continually noted in all submissions to the competent authorities:

*"I still consider that the Zone of Contribution to the tufa springs, which in part form the basis for designation of the down-gradient Knocksink Woods SAC, is potentially at risk by the proposed development". The conceptual model of the site does not consider existing topsoils, or variable subsoils, as contributors to the emergent groundwater hydrochemistry".*

- The National Parks and Wildlife Service have also come to this conclusion in their latest submission (Department Submission dated 10 March 2022 to An Bord Pleanála):

*"The Hydrological & Hydrogeological Assessment has shown that the sand/gravel layers underlying the proposed development site are discontinuous and interspersed with dense clay and silt subsoils.*

*The HHAR has not ruled out the possibility that the sand/gravel units act as preferential pathways for groundwater flow to the springs/seepages and therefore might contribute some groundwater flow to the otherwise small catchments (i.e. distinct and focused pathways).*

*These sand and gravel units have not been delineated and therefore it is unclear whether they will be avoided during construction and operational stages of the proposed development. This would be necessary to reduce the risk of catchment alteration and to ensure that pathways for groundwater flow are maintained and groundwater continues to flow unimpeded. Assessment cannot be regarded as 'appropriate' if it contains gaps and lacks complete, precise and definitive findings and conclusions capable of removing all scientific doubt as to the effects of the proposed project". (underline inserted).*

*The Department considers that it has not been shown beyond reasonable scientific doubt that this development will not have adverse effects on Knocksink Wood SAC, in light of the site's conservation objectives, in particular Petrifying Spring Conservation Objective attribute 'Hydrological regime: height of water table; water flow' and target 'Maintain appropriate hydrological regimes'."*

The submitters put forward that the above statement incorporating 'appropriate' and 'scientific doubt' is most important as this must comply to the wording of the EU Directive (and now Irish Law). (Department Submission dated 10 March 2022 to An Bord Pleanála), (Underline inserted).

- The submitters put forward therefore that it is inconceivable that higher densities may be considered under the proposed variation and that no impacts significant or otherwise will occur when the evidence is clearly contrary.
- It is put forward that AA should be re-visited.

### Opinion of the Chief Executive

The Proposed Variation does not entail the zoning of any additional land in the Enniskerry – Parknasilloge area, immediately south of the Knocksink SAC (Action Area 2 of the Bray MD LAP 2018).

In the zoning of this land, as part of the Bray MD LAP and the previous Enniskerry Town Plan (which formed part of the 2016 County Development Plan), full SEA and Stage 2 Plan AA were carried out in accordance with legislation and guidelines, by qualified and experienced environmental practitioners, subject to the inputs of prescribed environmental authorities.

These processes both concluded, subject to mitigation (detailed to follow), that in light of the best scientific knowledge, it can be determined that the zoning would not give rise to effects on the integrity of any Natura 2000 site (European Site), having regard to their conservation objectives and either alone or in combination with other plans, programmes or projects.

The Bray MD LAP provides for the following mitigation objective to address the potential for effects on Knocksink Woods SAC:

*Development proposals within the Parknasilloge Action Area shall take cognisance of the requirement to maintain the rate, quality and general areas where groundwater recharge occurs in order to maintain or enhance the recharge supplying the groundwater-dependent habitats of Knocksink Wood SAC. This shall be achieved through the review of existing hydrogeological assessment(s) and the carrying out of new hydrogeological assessment as necessary to inform the development of an appropriate SuDS system(s) throughout any development site and taking into account the cumulative in-combination impact of other development.*

The Wicklow County Development Plan 2022 provides for the following mitigation objectives to address the potential for effects on European Sites:

#### **CPO 17.4**

*To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs).*

*To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents:*

- *EU Directives, including the Habitats Directive (92/43/EEC, as amended) , the Birds Directive (2009/147/EC) , the Environmental Liability Directive (2004/35/EC) , the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019);*
- *National legislation, including the Wildlife Acts 1976 and 2010 (as amended) , European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act*

2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended) and the Flora Protection order 2015;

- National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010);
- Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same);
- Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan; Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.

#### **CPO 17.5**

*Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan.*

#### **CPO 17.6**

*Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.*

The key 'change' that the submitters appear to be concerned with is the proposed amendment to density objectives for Enniskerry and presumably are concerned that this would result in the possibility of more development on the AA2 zoned lands than envisaged by the 2018 LAP.

Account must however be taken of the fact that the density possible on the lands was altered by way of the adoption of the 2022 County Development Plan, which allowed for:

- Centrally located sites: 30 – 40+ units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.
- Edge of Centre Sites: 20-35 dwellings per hectare.
- Edge of small town / village: Densities of less than 15 – 20 dwellings per hectare (as an alternative to one-off housing) as long as such development does not represent more than 20% of the total new planned housing stock of the small town or village.

The 2022 County Development Plan was also subject to Stage 2 Plan AA.

The Proposed Variation puts forward proposed revised density guidelines in accordance with the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (DoHLGH 2024), said guidelines also being subject to Stage 2 AA, which is perceived as providing for the possibility of increased densities in Enniskerry. The CE does not concur that the proposed amendment was designed for or likely to have that outcome, and was therefore able to conclude that the Proposed Variation, not entailing a change to zoning or density compared to the previous plans, would not trigger the need for Stage 2 AA as no new

impacts arise that were not identified previously in the Stage 2 AA's for the Wicklow County Development Plan 2022 and the Bray MD LAP 2018.

However in order to clarify the position, the CE is recommending in this report that minor modifications should be made to the proposed new density Table 6.1, so that densities for Enniskerry remain essentially unchanged from the 2022 County Development Plan.

#### **Chief Executive's Recommendation**

No change to SEA and AA Screening; no grounds for further stages of SEA or AA.