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| Who are you:    | Agent                      |
| Name:           | Cairn Homes Properties Ltd |
| Reference:      | ARKLPF-163518              |
| Submission Made | November 12, 2025 4:42 PM  |

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

## Local Planning Framework PART A Strategy

- A.2 County Development Plan Strategy for Arklow

## Local Planning Framework PART B Settlement Specific Objectives.

- B.3 Housing Development
- B.9 Zoning & Land Use

### Maps:

Please find enclosed document.

This submission highlights that the Draft Variation and LPF do not adopt a sufficiently flexible approach to the zoning of Residential Land. Given that the Draft is conceived to be implemented within the life of the current Wicklow County Development Plan 2022-28, and a background of historically slow activation rates, the adoption of tiered approach to zoning is not appropriate.

It is Cairns submission that the phasing Policy ARK 18 and all corresponding areas of text that restrict housing supply on zoned land (on RN2 lands) is contrary to the NPF Implementation Guidelines (2025) and the Development Plan Guidelines (2022), and should be omitted in its entirety to be replaced with a single RN zoning objective.

### Upload a File (optional)

2337-Cairn- ARKLPF Cairn submission.pdf, 0.47MB

Our Ref: 2337 ARKLPF

Variation No.5,  
Administrative Officer,  
Planning Section,  
Wicklow County Council,  
Station Road,  
Wicklow Town.

11<sup>th</sup> November 2025

**Re: Draft Arklow Local Planning Framework 2025 / Proposed Variation No. 5.**

Dear Sir/Madam

We wish to make a submission on behalf of **Cairn Homes Properties Ltd** in response to the publication of the Draft Arklow Local Planning Framework 2025 / Proposed Variation No. 5.

## 1 OVERVIEW

This submission focuses on strategic planning policy which has broader applicability for residential development across the county. Specifically it comments on the following sections of the Draft.

- Proposed Variation 5: Part 1:2 and the reference to '*NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities*'
- Proposed Variation 5: Part 2:2 – Preamble and reference to *the new housing targets*
- B.3.3 Housing Targets & Extant Planning Permissions Arklow Housing Objectives ARK 17, 18 and 21
- B:9.2 Phasing

This submission highlights that the Draft Variation and LPF do not adopt a sufficiently flexible approach to the zoning of Residential Land. Given that the Draft is conceived to be implemented within the life of the current Wicklow County Development Plan 2022-28, and a background of historically slow activation rates, the adoption of tiered approach to zoning is not appropriate.

It is Cairns submission that the phasing Policy ARK 18 and all corresponding areas of text that restrict housing supply on zoned land (on RN2 lands) is contrary to the NPF Implementation Guidelines (2025) and the Development Plan Guidelines (2022), and should be omitted in its entirety to be replaced with a single RN zoning objective. The NPF Implementation Guidelines highlight that further to the approval of the Revised National Planning Framework (NPF) in April 2025, there is now a need for development plans to be updated to reflect the requirements of the NPF in respect of housing. This process will involve consideration of the potential need to identify additional lands suitable for residential zoning and that unmet demand will be addressed in the near term.

The **Development Plans Guidelines for Planning Authorities (2022)** set out the following clear instructions at 4.4.1 Land/Sites Already Zoned that phasing is not a mandatory requirement and in circumstances where there is an urgent need to increase housing supply:

*... when reviewing a development plan, it is recommended best practice that a phased approach be taken to prioritise the preferred sequence of development of such sites. However, phasing should be applied where there is a sound planning rationale for doing so, based on factors such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure.*

***This should also be viewed in the context of the urgent need to increase housing supply** **Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the plan-making stage.** **In all cases, whether phasing is applied or not, development plans must build in sufficient 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.***

## **2 PART 1 PROPOSED CHANGES TO VOLUME 1 OF THE WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028**

### **2.1 Proposed Variation 5: Part 1:2, Section 3.5 Local Area Plans (LAPs) & Local Planning Frameworks**

Volume 1 of the County Development Plan is proposed to be varied to make reference to the NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities as shown in red:

*In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP/ **LPF**, with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise and (b) the PART A - ii LAPs/ **LPFs** do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation, **with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025).***

#### **NPF Implementation Housing Growth Requirements – Guidelines for Planning Authorities, July 2025**

This submission raises a fundamental concern regarding the failure to apply the National Planning Framework First Revision, April 2025 and NPF Implementation Housing Growth Requirements – Guidelines for Planning Authorities, July 2025, which requires Planning Authorities to vary development plans immediately to align the zoning provisions with the population and housing targets set out in the Revised NPF.

*Policy and Objective 3 of the NPF Implementation: Housing Growth Requirements states:*

***"It is a policy and objective of these Guidelines that planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan. Where a planning authority is undertaking a development plan review under the Act of 2000 or preparing a new development plan under the Act, a parallel process***

*of varying the current adopted development plan, as appropriate, should be undertaken. **The policies and objectives of these Guidelines should not be reflected in Local Area Plans without also being reflected within the relevant development plan.***” (our emphasis)

The Revised NPF sets out an increased national housing delivery target of 50,000 units per annum, up from 25,000 in 2018. This represents a material change in national planning policy with directed implications for counties within the Eastern and Midlands Regional Assembly area, including Wicklow. The 2020 Housing Supply Targets, Adopted Development Plan Targets are shown in the context of the new annual Housing Targets between 2025 to 2034 and 2035 to 2040 for Wicklow are shown below. This significantly increases the annual housing requirements for the County and negates the need for differentiating between tier 1 and tier 2, while taking into account infrastructural constraints.

**Table 1: New Housing Targets (Source: NPF Implementation Guidance)**

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

The revised housing targets for Wicklow County Council between 2025 and 2034, result in an increased demand of 47% of units than the annual housing requirements adopted in the Wicklow County Development Plan 2022-2028. Apply and referring to the current core strategy is at odds with the current NPF.

Based on the above, adopting the draft LPF in advance of revising and varying the County Development Plan, risks misalignment of the plan with national policy.

While the inclusion of flexibility is acknowledged, the basis upon which residential land zoning is currently quantified remains linked to the outdated Core Strategy, which does not yet reflect the revised annual housing requirements nor the additional provision required to address the urgent need for housing.

While references are inserted of the NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities under Variation No. 5 of the CDP, there is unfortunately a failure by Wicklow County Council to implement these guidelines in accordance with the steps specified in these guidelines, which have been issued by the Minister under s.28 of the Planning and Development Act, 2000 (as amended). In fact, through the phasing approach adopted in the plan, it is obstructive to the achievement of the existing Core Strategy goals.

We highlight that other local authorities have published proposed Development Plan Variations for Consultation that address this very issue. Kildare Co.Co. is proposing to lift the Tier 2 Restriction. While Cork City are maintaining a ‘Tier 2’ Zoning, it is not linked to thresholds for Tier 1.

### 3 PART 2 PROPOSED CHANGES TO VOLUME 2 OF THE WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028

#### 3.1 Proposed Variation 5: Part 2:2

##### **PART 6: 6.1 Preamble**

##### **INTRODUCTION TO LOCAL PLANNING FRAMEWORKS**

*The role of a land use plan or framework is to put in place a policy framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan or framework.*

This rationale for the LPF Frameworks as set out 6.1 is sensible. It recognises that the objective of the LPF is to define a robust policy framework for development and investment to proceed, but planning authorities are not in a position to control the specifics of what takes place, where and when. The LPF should in principle establish a strong level of confidence in the development of the town. However, measures and policies included in **B.3.3 Housing Targets & Extant Planning Permissions** and **B.9.2 Phasing** undermine this core rationale..

It notes in this section that *LPFs are framed in accordance with the development horizon set out in the 2022 County Development Plan.*

This means that there is an expectation that land use policies are to be implemented between 2026 and 2028. In this context, the adoption of a tiered approach to zoning is counterproductive.

### 4 PROPOSED VARIATION 5: PART 2:3

#### **Arklow Local Planning Framework A:2.4 Population and Housing**

Arklow is a Level 3 settlement in the County settlement hierarchy – a ‘self-sustaining growth town’. Table 1 below sets out the key elements of the Wicklow County Development Plan ‘Core Strategy’, as they apply to Level 3 settlements. The population and housing targets for Arklow are provided in the Core Strategy of the County Development Plan 2022 2028. The lands that are needed to be zoned to meet the current target will be zoned ‘New Residential’ and identified in this LPF as ‘New Residential Priority 1’ lands.

**Table A:2.1 Arklow Population and Housing Targets**

| Arklow        | 2016 Census | 2022 Census | CDP Target Q2 2028 | CDP Target 2031 | Growth 2016-2031 |
|---------------|-------------|-------------|--------------------|-----------------|------------------|
| Population    | 13,226      | 13,399      | 15,419             | 16,441          | +3,214           |
| Housing Stock | 5,406       | 5,585       | 6,461              | 6,627           | +1,221           |

A minimum of 30% of the targeted housing growth shall be directed into the existing built up area of the settlement, on lands zoned ‘town centre’, ‘existing residential’ and ‘mixed use’. New residential development outside of the existing built up envelope, subject to the amount of zoned land not exceeding 70% of the total housing target for that settlement.

The Draft LPF recognises (**section B:1.1**) that many of the regeneration opportunities include the potential re-use of vacant structures, the redevelopment of empty street frontages and back land plots to the rear of town centre properties. While Cairn supports the town centre first principle of

the plan, it must be documented that these lands present viability and feasibility challenges and take considerable effort and time to deliver.

Local authorities' land activation powers and budgets are limited, so it is all the more important that brownfield potential is not used as a policy tool to restrict overall residential delivery.

## **5 B:3 HOUSING DEVELOPMENT**

This section sets out the local objectives for sustainable residential development in Arklow that are relevant to and implementable through a local land-use framework. It states:

*It is an aim of this LPF to focus new residential development into the existing serviced built up envelope of the settlement. The 'Town Centre' (TC) zone, Waterfront Zone (WZ) and the 'Existing Residential' (RE) zone all present significant housing opportunities through densification of the existing built up area, re-use of derelict or brownfield sites and the development of infill and backland sites.*

In essence, the only policy mechanism proposed to support town centre regeneration, is to prevent residential development happening in greenfield locations, on lands that have no commonality of ownership or commercial interest or exert any kind of leverage on implementation.

The town centre area is in fact quite restricted in its geographical extent and sites that are ready to be implemented. This is acknowledged in the draft LPF:

*These central areas may not be sufficient in size and scope to accommodate all of the required long term future housing growth and therefore new 'greenfield' housing development shall also be considered.*

However, while it is acknowledged that Greenfield sites are necessary, the plan adopts a restrictive policy framework on implementation, as set out under B.3.3.

### **5.1 B.3.3 Housing Targets & Extant Planning Permissions**

The Draft LPF considers that *"Having regard to the Core Strategy and population/housing targets provided therein for Arklow, there is capacity within the lands zoned TC, WZ, RE (all located in the serviced, built up envelope) and lands zoned RN1 (greenfield residential lands either within the built envelope or with extant planning permission) to meet current targets."*

It then sets out the argument that in order to address the NPF Guidelines the RN2 zoning "provides for additional zoned serviced / serviceable residential lands, over and above that needed to meet current targets".

It is respectfully submitted that the Draft LPF quite clearly states that its land use strategy is based entirely on the 2022 Development Plan Core Strategy. Furthermore, the Draft LPF subsequently incorporates a series of restrictive objectives (ARK 17 and ARK 18) and prevent developers bringing land forward on the RN2 lands in the short term (i.e. life of the development plan).

**Table B: 3.1 to follow sets out the land zoned for new residential development in this LPF.**

| Arklow Housing Objectives |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ARK 17</b>             | <p>The priority for housing growth shall be the existing built up area of the settlement, on lands zoned 'town centre', 'waterfront' and 'existing residential'. Development shall extend outwards from the centre of Arklow with undeveloped land closest to the centre and public transport routes given priority. 'Leapfrogging' to peripheral areas shall be strongly resisted.</p> <p>In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this LPF or the associated tables on the number of units that may be delivered within the built up envelope of the town.</p> |
| <b>RK 18</b>              | <p>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:</p> <ul style="list-style-type: none"> <li>♣ At least 75% of Priority 1 new residential lands (RN1) have been activated (i.e. consent obtained and development initiated);</li> <li>♣ 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.</li> </ul>                                                                   |

It is Cairn's submission that ARK 18 and all corresponding areas of text that restrict housing supply on zoned land is contrary to NPF Guidelines and Development Plan Guidelines and should be omitted in its entirety. While Cairn fully supports the Regeneration of the town centre, the policy objective ARK17 should not be allowed to prevent housing delivery in other areas.

## 5.2 B:9.2 Phasing

Section B:9.2 Phasing re-emphasises the restrictive phasing and implementation strategy Wicklow County Council have adopted in its LAPs and LPFs. It states:

*Permission will only be considered during the lifetime of this LPF for RN2 lands where 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 decision to grant permission being significantly breached.*

*It is an objective of the Council that development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach:*

- *Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided;*

- *A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- *Areas to be developed should be contiguous to existing developed areas.*

*Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.*

It is Cairn's submission that this policy does not reflect the intent or spirit of the NPF Implementation Guidelines (2025) or the Development Plan Guidelines (2022).

As noted above, given that the Draft LPF is conceived to be implemented within the life of the current Wicklow County Development Plan 2022-28, the adoption of tiered approach to zoning is not appropriate. Given historic constraints to development (ie. Waste Water Treatment Plant), it is important that the plan recognises and address a legacy of under provision of housing. It is respectfully submitted that a phased or tiered approach designed for a 6 year plan is irrelevant for a 2 year implementation window.

The recent report by Goodbody research<sup>1</sup> demonstrates that actual activation and housing completion rates are far below the 75% rate of all zoned land which the County Development Plan presumes will be delivered in a 6-year period. WCC secured only 20% activation of zoned land over the last LAP period. The reasons lands remain inactive are multi layered and complex and can relate to viability issues, lack of infrastructure, LAP phasing, title constraints, environmental issues etc. However, the point remains that the draft LAP needs to ensure there is adequate provision for zoned and serviced sites that are likely to come forward during the lifetime of the plan.

We highlight that the Blessington LAP 2025 included an ameliorative wording that sought to address the bluntness of the transition between the Tier to Tier 2 zoning. It allowed for a reduction from 75% to 50% after a period of 3 years:

*- 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;*

We maintain that this policy 'transition' is still far too rigid, but it does demonstrate that there is scope within the Wicklow planning hierarchy to adopt a more responsive zoning and development strategy.

*It is quite clear that it is the government's position that where there is an urgent need to increase housing supply Phasing may not be necessary ..... In all cases, whether phasing is applied or not, development plans must build in sufficient 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.*

The publication of the NPF Implementation Guidelines underlines that there are not unforeseen circumstances regarding the need to deliver activated housing lands as far as possible within the framework of the LPF and Variation process.

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<sup>1</sup> Goodbody (September 2024) Residential land availability, an assessment of residential land provision in Ireland

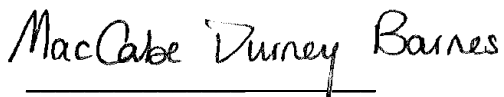
The Draft LPF and Variation incorporates in-built impediments to development, both in terms of phasing and sequential development that undermine a robust planning framework where developers and investors can have confidence in a fair and efficient implementation.

## **6 CONCLUSIONS**

Wicklow County Council is requested to carefully consider Cairn Homes submission on the Draft LPF presented in this letter.

Cairn Homes are committed to continuing the delivery of sustainable homes at scale in Wicklow and will continue to engage with the planning authority on the implementation of development of sites and future variation processes for the County Development Plan and LPFs.

Yours sincerely

  
**MACCABE DURNEY BARNES**