



# Variation No.6

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Submission by Alex Pigot re Variation No 6 of Wicklow CoCo LAP 2022-2031.pdf, 0.93MB

Administrative Officer,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96

Re Variation No.6.

Dear Wicklow County Council Administrative Officer,

I have read with some difficulty Variation No. 6 to the Wicklow County development plan.

Variation 6, in regard to Enniskerry, can only be described as Trumpian – envisaging as it does a more than 100% increase in the housing stock for the village and the destruction of its character by the building of high-rise apartments in order to achieve the stated housing densities.

I do not believe that this is what Wicklow County Council wish for Enniskerry Village however, given the most recent 2022 plan which decided housing targets to 2031 and contained the following in Appendix 3 Housing Strategy:

Level	Settlement	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
	Enniskerry	648	34	40	36	15	125

i.e. an increase in housing of 125 (or ~20%) over the period 2022-2031

I also note the remarks of your CEO at that time which were as follows:

***'Having regard to level of growth already experienced / in train and the current deficiencies in the following infrastructure and facilities, Enniskerry is not determined to be well positioned to accommodate significant additional housing growth during the plan period, and focus should be on consolidation and investment in employment, and transport infrastructure/accessibility, in particular: :- '***

- 1. The very low jobs ratio in Enniskerry, with very few employment opportunities in the locality, which results significant commuting outflows from the town.***
- 2. The inadequacies in public transport services, as well as lack of opportunities to use active modes of transport within the town and to surrounding larger towns (such as Bray) having regard to inadequacies in footpaths and no designated cycleways.***

***The significant environmental sensitivities in the area, particularly the Knocksink Wood SAC within the town centre, which is particularly susceptible to changes to the ground and surface water regime in the wider area."***

He went further to say:-

***"As set out in the appended 'Chapter 3 – Proposed Amendments', the housing target for Enniskerry up to 2031, less units already completed, is 91."***

**“However, the development capacity of existing zoned land is in the order of 520 units. Therefore, there is significant over provision, and this will require to be addressed in the review of the Bray MD LAP in due course.”**

**“Therefore, it is not considered that there is scope to increase the population target for Enniskerry as part of this Plan.”**

**“With respect to zoning requirements in Enniskerry, and AA2 in particular, these will be dealt with in the next review of the LAP for the settlement.”**

[CEO, Wicklow County Council, response re submission to CDP. (p. 334/ SECTION 3 ASSESSMENT OF SUBMISSIONS)]

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And in the original development plan Enniskerry is described as follows (which text is now to be disappointingly deleted in Variation No. 6):

**Table 6.1 Density Standards**

Location	Density Standards
<b>Large Towns<sup>5</sup></b> (Bray, Greystones-Delgany, Arklow, Wicklow—Rathnew and Blessington)	<ul style="list-style-type: none"><li>Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station.</li><li>Outer Suburban / Greenfield Sites: Minimum density of 35—50 dwellings per hectare.</li><li>Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares.</li></ul>
<b>Small Towns and Villages<sup>6</sup></b> (Kilcoole, Newtownmountkennedy, Baltinglass, Enniskerry, Rathdrum, Aughrim, Ashford, Carnew, Kilmacanogue, Roundwood, Tinahely, Newcastle, Dunlavin, Avoca, Shillelagh, Donard)	<ul style="list-style-type: none"><li>Centrally located sites: 30—40+ units per hectare for mainly residential schemes may be appropriate or for more mixed use schemes.</li><li>Edge of Centre Sites: 20-35 dwellings per hectare.</li><li>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.</li></ul>
<b>Villages under 400 Population</b>	Any individual scheme for new housing should not be larger than 10 units.

Given the above, I can only assume that a mixture of lobbying by vested interests and a lack of intelligent ideas by central government have led to Wicklow CoCo being persuaded to produce this destructive (to Enniskerry at least) Variation No 6 to the Local Area Development Plan.

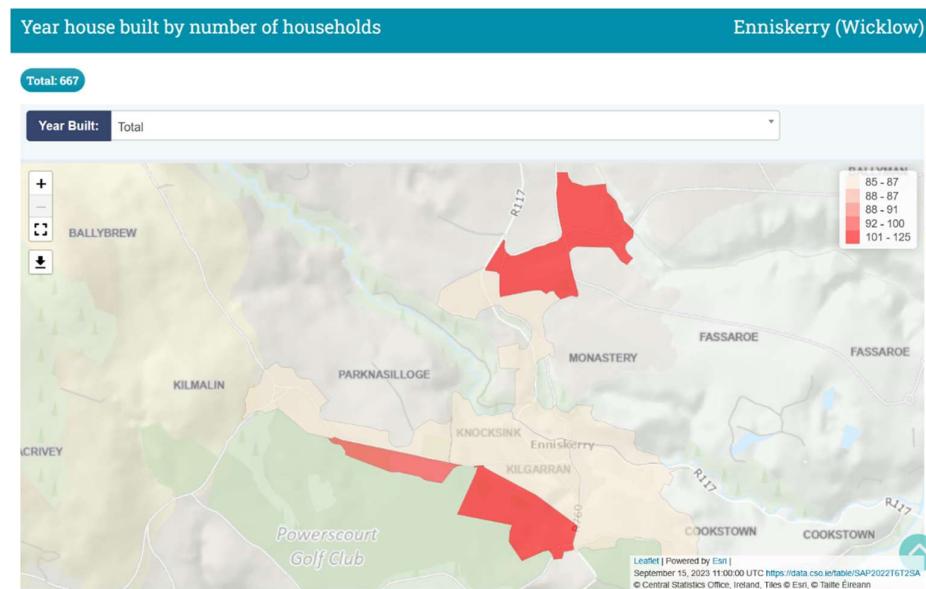
This destructive plan can be seen from the following points numbered 1, 2 and 3:

1. In table 3.4 it would appear that the total number of dwellings being built in Enniskerry is  $113+17 = 130$ , the number under JR is 129 and the number which could possibly still be built on the 13 hectares (wherever those hectares are is not clear?) is 455 – giving a total of 714 new dwellings since 2022.

**Table 3.4 Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)**

Level	Town	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Zoned land with no live permission <sup>7</sup> (ha)	Estimated capacity of zoned land with no live permission (units)
	Enniskerry	113	17	129	13	455

But as shown above the original plan was for just 125 dwellings. And the number of buildings in Enniskerry was just 648 (the census figures was 667 in 2022). So, the increase proposed between 2022 and 2031 in the original local area plan was 20% - but now, in the Variation No. 6 is possibly as much as 107%!



2. In Table 6.1 Enniskerry is classed as a “Key Town / Large Town” and put into the same category as towns such as Wicklow itself, Arklow and Newtownmountkennedy which are obviously much larger towns and far more appropriate places for increased housing. The density applied to these “Key Town / Large Town” is in excess of 30 and up to 100 per hectare. Even at 30 per hectare the dwellings must be small or be duplex or be apartments. There is nowhere in Enniskerry at the moment which has a density greater than 25 per hectare. Sika Woods for example is about 23 dwellings per hectare, Kilgarran Park about 15 per hectare. For Enniskerry to retain its character a density of 25 or less should be maintained.

Table 6.1 Areas and Density Ranges

Areas	Density Ranges (net)	Applicable to
Metropolitan Towns (>1,500 population) Centre and Urban Neighbourhoods	50 dph - 150 dph	Bray Greystones-Delgany
Metropolitan Towns (>1,500 population) Suburban / Urban Extension	35 dph - 50 dph Up to 100 dph shall be open for consideration at 'accessible' suburban / urban extension locations.	
Metropolitan Area – Village (<1,500 population)	Density should be tailored to reflect existing density and / or built form but should not generally fall below 25 dph.	Kilmacanogue
Regional Growth Centre Centre & Urban Neighbourhood	50 dph-150 dph	
Regional Growth Centre Suburban/Urban Extension	35 dph - 50 dph Up to 100 dph (net) shall be open for consideration at 'accessible' suburban/urban extension locations	
Key Town / Large Town Centre & Urban Neighbourhood	40 dph-100 dph	Wicklow – Rathnew Arklow Blessington Baltinglass Enniskerry Kilcoole Newtownmountkennedy Rathdrum
Key Town / Large Town Suburban/Urban Extension	30 dph to 50 dph Up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations	
Small / Medium Town Centre	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)	Ashford Aughrim Carnew Dunlavin Tinahely
Small / Medium Town Edge	25 dph - 40 dph	Avoca Donard Newcastle Roundwood Shillelagh
Rural Town or Village	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	Level 7-9

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

3. I note out of interest the number of JR (under judicial review) dwellings is less than 10% of the units permitted and yet to be commenced in the table 3.4 below – though our media and vested interests would tell us otherwise.

I am assuming that the 129 JR dwellings mentioned in Table 3.4 are the dwellings at Parknasillogue area AA2. Should these 129 dwellings be also now built, they will negatively affect the viability of the Knocksink Woods EU designated Special Area of Conservation.

Table 3.4 Future Housing Capacity Wicklow (Levels 1-6 settlements as of Q3 2025)

Level	Town	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Zoned land with no live permission <sup>1</sup> (ha)	Estimated capacity of zoned land with no live permission (units)	Of which, subject to 'Phase 1/Priority 1' designation or no phasing designation	Of which, subject to 'Phase 2/Priority 2' designation <sup>2</sup>	Estimated capacity of zoned and currently fully serviced <sup>3</sup> land with no live permission (units)	Estimated capacity of zoned and serviceable <sup>4</sup> land with no live permission (units)
1	Bray	157	575	135	101	7,405	7,405	0	7,405	7,405
2	Wicklow - Rathnew	502	639	0	59	2,916	1,779	1,137	2,916	2,916
3	Arklow	58	854	0	99	4,227	2,178	2,049	1,065	4,227
	Greystones - Delgany	264	209	3	45	2,098	528	1,570	2,098	2,098
	Blessington	664	142	0	46	1,583	1,082	501	0	0
4	Baltinglass	69	69	0	5	96	96	0	48	48
	Enniskerry	113	17	129	13	455	455	0	455	455
	Kilcoole	173	57	0	32	1,094	796	298	1,094	1,094
	Newtownmountkennedy	447	43	0	3	77	77	0	77	77
	Rathdrum	141	0	0	12	244	244	0	86	86
5	Ashford, Aughrim, Carnew, Dunlavin, Tinahely	117	191	0	59	1,285	1,285	0	784	1,285
6	Avoca, Donard, Kilmacanogue, Newcastle, Roundwood, Shillelagh	63	23	0	31	768	768	0	245	400
	<b>Total</b>	<b>2,768</b>	<b>2,819</b>	<b>267</b>	<b>505</b>	<b>22,248</b>	<b>16,693</b>	<b>5,555</b>	<b>16,273</b>	<b>20,091<sup>11</sup></b>

So, what would I like (and after discussing these measures within the community) Wicklow County Council to do now is to make changes in their Variation No. 6 of the Local Area Plan so that:

- A. Enniskerry Town/Village should therefore be reclassified in Table 3.4 as level 6 and in 6.1 as a “Rural Town or Village”.
- B. ***In no hectare within the town should the density of 25 houses per hectare be breached.***
- C. Since Enniskerry has already reached/passed its 2031 target of 125 additional dwellings, no further dwellings at scale should be built.
- D. The 13 hectares of land currently zoned for housing should be zoned otherwise – and since I am unaware where these are, I suggest agricultural.
- E. The zoning of the AA2 land which is the subject of the JR should be changed from “Residential” to “Green” / Recreation / Conservation”.

With kind regards.

Alex Pigot  
Green Party local area representative for Bray West