



# Variation No.6

Who are you:	Group
Name:	Wicklow Planning Alliance
Reference:	VAR6-113827
Submission Made	January 15, 2026 11:49 AM

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- Chapter 1 – Proposed Variation No. 6
- Chapter 3 – Proposed Variation No. 6
- Chapter 6 – Proposed Variation No. 6

**Write your observations here:**

The submission is attached

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20260115 Variation 6 of the CDP.pdf, 0.19MB

# Wicklow Planning Alliance



'Variation No.6',  
Administrative Officer,  
Planning Department,  
Wicklow County Council,  
Wicklow Town,  
A67 FW96

## Submission regarding Amendment 6 of the CDP

Members of the WPA 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. We note that measuring housing units rather than population may distort the relationship between population and infrastructure leading to further erosion of quality of life but appreciate the constraints on the local authority to control these issues.

Previous overzoning going back to 2004 resulted in more sprawl than is good for society and the economy. It resulted 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 that are the bain of current life.

Over subsequent revisions of county development plans planners did their best to correct the overzoning and a careful analysis of current demand has established that current levels of zoning are roughly correct for a county on the edge of the capital city.

The proposal to do away with sequential zoning is not supported. With the proper use of vacant site tax it would be possible to really plan the growth of Wicklow's towns for the

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benefit of local populations rather than allow land owners to make those decisions in their own interests.

Inevitably most media attention will be focussed on zoning issues but the WPA note that the draft amendment also uses this opportunity to make minor amendments in other sections of the County Development Plan and we would suggest that the amendment should actually go even further. The amendment states *the guidance and assessment criteria set out in the 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' (DoHLGH 2024) shall be applied. have been updated in section 3.6.5 of chapter Housing and sections in the plan on urban design amended in line.*

There are specific changes regarding densities on page 21 and on quality of design pages Pages 31-36

We would suggest that previous guidelines have not been adequate to ensure planning applications for the development of estates will produce good design. There are some well designed new housing estates in County Wicklow but there are still some bad examples and we could commend controls as outlined in the attached article on low rise, medium density housing which Dobbin and Co Architects presented to the MMC National Conference in 2025 regarding the Government's Starter Homes Policy. See <https://www.linkedin.com/pulse/starter-homes-programme-2026-why-low-rise-medium-density-tlfd/>

As this article says.. 'Too often we default to familiar extremes: low-density suburban housing at one end, complex apartment blocks at the other. Low-rise, medium-density housing offers a third option — and a more balanced one. Low-rise, medium-density (LRMD) housing typically consists of terraces, duplexes and courtyard clusters, generally between two and four storeys. Densities in the order of 35–80 dwellings per hectare are routinely achievable without height, lifts or deep basements.

RIAI research has shown that these models can more than double the number of own-door homes compared with conventional suburban layouts, while retaining human scale and liveability.'

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Key ways to make starter homes more affordable and more sustainable would be

- a base-build approach rather than full fit-out,
- limited or optional internal finishes at handover,
- communal facilities where appropriate,
- and a strong focus on long-term building performance.

WPA would like to propose a revision of the Housing Chapter in the draft amendment currently on the table to include these concepts.

The WPA are also concerned that the SEA does not offer a realistic analysis of the impact of increasing the number of units by increasing densities as proposed in this amendment. 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 .

Nor is the inevitable increase in carbon emissions realistically reflected in the paragraph copied below. *Potential conflicts with climate adaptation measures including those relating to flood risk management* are reported yet the expansion of the mitigation is totally inadequate..

## SEA P41-47

*Climate change action is one of three cross-cutting key principles of the Plan and has been integrated into the Plan in a proactive way with the inclusion of relevant policies and objectives; strategic policy outcomes incorporating climate change mitigation and adaptation into land-use planning, supported by land-use policies and objectives that where relevant incorporate objectives that both mitigate against the source of the causes of climate change and adapt to reduce the impacts of climate change. Climate change action informs*

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*objectives in relation to all chapters of the Plan, including the town and settlement plans and the Plan appendices. Given the Plan's remit as a land use framework not all sources and impacts are addressed in the Plan objectives (e.g. impact on insurance costs). The Plan's role in addressing climate change is part of a combined overall effort by Wicklow County Council to fulfil its role in addressing the climate change challenge. Climate change poses a real threat to ecosystems, however these ecosystems including wetlands and woodlands, are important for their role as carbon sinks, water attenuation and flooding protection. As it noted in the RSES, careful land management is needed to ensure that land use changes do not impact on the ability of the natural environment to absorb climate impacts. The Strategic Environmental Assessment and Strategic Flood Risk Assessment also have a key role to play in addressing climate change mitigation and adaptation. The approach taken in crafting the Plan is to identify what are the impacts and sources of climate change, identify the key sectors of the sources of impacts that are relevant to the County Plan as a land use plan and to ensure that these are considered in the crafting of all policies and objectives. Under the provisions of the Climate Action and Low Carbon Development (Amendment) Act 2021, Local Authorities are required to prepare local Climate Action Plans outlining how they are implementing their adopted Climate Action Adaptation and Mitigation strategies. Wicklow's Climate Action Plan 2024-2029 is adopted and being implemented. Building on existing climate action policies, the RSES identifies the following five areas where Climate Change Action should be targeted in the region namely Built Environment, Sustainable Transport, Energy and Waste, Flood Resilience and Water, and Green Infrastructure and Eco-system services. Provisions relating to these areas have been integrated throughout the County Development Plan.*

Craig Bishop.

Chairperson.

On behalf of the WPA

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