



Proposed Variation No. 7 to the Wicklow County Development Plan Submission Report

Submission Details

Ref	VAR7-120939
Who Are You?	Private Individual
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Proposed Variation Parts

Topic	Part 1: Proposed Variation to town / settlement zoning maps and, where relevant, proposed new or amended site specific policy objectives.
Submission	1. Level 2: Wicklow Town -Rathnew

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Sean & Claire McGrath - Objection_Letter_WR6_Dunbur_Lower_v2.docx, 0.01MB

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23 September 2026

The Senior Executive Planner

Planning Department

Wicklow County Council

County Buildings

Station Road

Wicklow Town

Co. Wicklow

**Re: [Objection to Proposed Variation No. 7 to the Wicklow County Development Plan 2022–2028](#) —
Site WR6, Dunbur Lower ([Call for Sites submission CFS-093853](#))**

Dear Sir / Madam,

We are writing as residents of [REDACTED], Wicklow Town, to formally object to [Proposed Variation No. 7 to the Wicklow County Development Plan 2022–2028](#), insofar as it relates to the rezoning of lands at Dunbur Lower (Site WR6). We understand this proposal, based on the '[call for sites' submission CFS-093853](#)', could facilitate the development of up to “669 homes” on a comparatively small parcel of approximately 18 hectares. With current average household occupancy in Wicklow at [2.84](#), this could bring up to 1,900 additional residents and an estimated 700–1,000 additional vehicles to an area that is entirely unequipped to absorb them.

We set out below our grounds of objection. The first — that these lands have already been determined by the Council to be unserviced and unsuitable for zoning — is, in our view, sufficient to reject this rezoning. The grounds that follow are all related concerns: each is a direct consequence of development on a site the Council has already found to lack the infrastructure to support it, and together they reinforce why that determination should stand.

1. The rezoning directly overturns the Council's own recent determination that these lands are unserviced and should not be zoned

The current [Wicklow Town–Rathnew Local Area Plan 2025 \(WTR LAP 2025\)](#) is explicit on this point. Page 12 states that the key parameters for the future physical development of the settlement are "based around protection of the environment, sustainability, compact growth and developing the settlement in a manner that will generate the minimal number of private car journeys and maximum walking, cycling and use of public transport," and goes on to specifically note that "growth to the south is constrained by Wicklow Head, the golf club and the high elevation of the lands at Ballyguile and Dunbur, with these areas constrained by the lack of appropriate transport and water services infrastructure."

Separately, in the [1st Chief Executive's Report on the draft WTR LAP 2025–2031](#), there was a response to submission 156, a 2024 residential rezoning request for 15 acres in Dunbur Lower which now form part of the current proposed lands in WR6. The Chief Executive at that time confirmed that lands in this area are "not serviced" and that "in accordance with the NPF 'Tiered Approach' to zoning and NPO72c, where land is not serviced, and not likely to be serviced within the lifetime of the plan, they should not be zoned" (p.171).

Rezoning WR6 under Variation No. 7 directly overturns this baseline without any evidence that the infrastructure deficits identified by the Council's own Chief Executive have been, or can be, resolved within the lifetime of the plan. This is not a minor inconsistency — it is the Council reversing a considered position on the same lands, taken barely a year earlier, with nothing put forward to justify the reversal. The CFS-093853 submission's own claims illustrate why that earlier determination was correct and remains unaddressed.

On water and foul drainage, the submission claims adequate capacity, citing a confirmation of feasibility from Uisce Éireann. This directly contradicts the Chief Executive's finding that these lands are "not serviced" and the [WTR LAP 2025](#)'s own assessment of inadequate "water services infrastructure" in this area. Given this contradiction, and the requirements of NPO72c, we request independent verification of whether the site could realistically support a development of this scale over the lifetime of the plan, rather than the developer's own assessment being accepted at face value.

On electricity, the [CFS-093853](#) submission states the land has access to two substations with a combined capacity of 410 kVA. A standard domestic connection requires 12 kVA ([ESB](#)). Even allowing for efficiencies of scale, this capacity falls well short of what would be needed to serve a development of up to "669 homes" — a second, independent confirmation that the servicing picture presented in support of rezoning does not hold up, consistent with the Council's own prior finding.

2. Lack of public transport services

The infrastructure deficit is not confined to water and power. The [CFS-093853](#) submission also claims the site has access to "good regular public transport services," citing a 15-minute walk to the nearest bus stop (135561 – Wicklow Gaol). This is inaccurate. Google Maps puts the walking distance from that stop to our residence at  Seacliff at approximately [32 minutes](#); in our own experience the return journey, which is uphill, takes closer to 40 minutes. This is consistent with the WTR LAP

2025's own recognition of a "lack of appropriate transport" in this area, and we do not believe the claim of good public transport access can be sustained.

3. Inadequate pedestrian and cycling access

WR6 is described as including "high quality pedestrian and cycling links to existing schools, community infrastructure, transport services," including provision for older people and those with accessibility needs. The [CFS-093853](#) submission acknowledges the site cannot connect to the existing cycling network, but suggests the R750 has "an existing carriageway and sections that appear to have verge space to accommodate cycle lanes." As local residents, we dispute this. There are some very old and faded road markings in places that attempt to denote cycling space, but these are inadequate as there are numerous places where a travelling car must use these spaces to avoid oncoming traffic. Also, the road is narrow, in places has footpath on only one side, and has tight bends with limited lighting at night.. There is no room for safe combined cycling and pedestrian provision, particularly if the road is to carry the additional traffic generated by up to "669 homes" with no alternative public transport option.

4. Severe traffic congestion on the R750

Taken together, the absence of public transport, cycling and pedestrian provision means the shortfall in servicing described above translates directly into traffic impact. The R750 is a coastal road providing the only route in and out of Wicklow Town from this direction, and it already experiences delays at peak times due to its narrow width and on-street parking closer to town requiring drivers to regularly give way. With no viable public transport, no cycle lanes, and a 30–40 minute walk into town, residents of any development at Dunbur Lower would have little realistic option but to drive, meaning most residents would require at least one car per household. This could add in the region of 700–1,000 additional vehicles to this single route, substantially worsening congestion with no alternative road to absorb the impact. There is also no convenient access to the N11 nearby, and those commuting to Dublin will most likely need to go directly through Wicklow Town and the one way system, further increasing peak-time traffic.

5. Sightlines for turning onto the R750

The [CFS-093853](#) submission states there are sight lines of 120m in both directions. As a daily driver on this stretch of road, our own experience is that visibility is significantly impaired by the road's curvature, and we regularly have to brake sharply for vehicles approaching from the right when turning left towards Wicklow Town. We would ask that this claim be independently verified rather than accepted at face value, particularly given the volume of additional turning traffic this development would generate. Increasing the volume of possible cars on this road will also increase the probability of accidents occurring.

6. Impact on the coastal landscape and Sea Cliff Walk

Beyond the servicing and traffic concerns above, the scale of this development would cause separate and irreversible harm to a protected coastal landscape. Dunbur Lower lies within Coastal Cells 7 and 8 and is subject to Objectives CPO 19.22 and CPO 19.23 of the Wicklow County Council Development Plan ([Chapter 19 – Marine Planning & Coastal Zone Management, Variation No. 2, 2025](#)). CPO 19.23 requires the Council "to preserve the open character of Wicklow Head." Wicklow Head is designated

an "Attractive Coast" asset in the [WTR LAP 2025](#), and this site occupies elevated land directly opposite it. Developing an 18-hectare greenfield site at this scale would irreversibly alter the open, rural character of the southern coastal approach to Wicklow Town. We are also concerned about the impact of significantly increased footfall — potentially up to 1,900 additional residents — on the protected Sea Cliff Walk and the marine life it borders.

7. More suitable sites already identified elsewhere in the plan

Finally, rezoning WR6 is not necessary to meet housing need in any case. Being located on the very edge of the town with no meaningful access to public transport, and lacking the servicing set out at Ground 1 above, development at this scale at Dunbur Lower would represent precisely the kind of sprawl the [WTR LAP 2025](#) seeks to avoid, and runs contrary to the plan's own stated parameters of "protection of the environment, sustainability, compact growth and developing the settlement in a manner that will generate the minimal number of private car journeys and maximum walking, cycling and use of public transport" (p.12).

By contrast, several other sites identified under Proposed Variation No. 7 — WR2 and WR3 (Ballynerrin North and South), WR4 (Broomhall), WR5 (Merrymeeting), WR7 (South of Kirvin Hill and Hawks Bay) and WR8 (Ashtown Lane) — are already named in the [WTR LAP 2025](#) (pp.12–13) as key to "maximising the development potential of large sites close to the core" and to facilitating "the redevelopment of brownfield opportunity sites within the centre of Rathnew village" and "the appropriate development of greenfield residential lands that are serviced and serviceable within the settlement, particularly in the Burkeen, Ballynerrin/Ashtown, Broomhall, Ballybeg and Tinakilly areas." Unlike WR6, these sites are not subject to the Council's own unresolved finding that servicing is inadequate. We would ask that the Council prioritise these more sustainable, better-serviced locations ahead of Dunbur Lower.

Conclusion

For the reasons set out above — and principally because this rezoning reverses the Council's own recent, considered determination that these lands are unserviced and should not be zoned, without any evidence that this has changed — we respectfully request that Wicklow County Council reject the proposed rezoning of Site WR6 at Dunbur Lower under Proposed Variation No. 7. The consequences of proceeding regardless, set out in the grounds above, would be severe: a site poorly connected by road, cycling and public transport infrastructure, and development at this scale would have a significant and irreversible impact on a protected coastal landscape — all while more suitable, better-serviced sites elsewhere in the plan remain available to meet housing need in a manner consistent with the Council's own compact growth objectives.

We would welcome the opportunity to discuss these concerns further and would ask that this submission be taken into account in full during the Council's consideration of Proposed Variation No. 7.

Yours faithfully,

Sean McGrath and Claire McGrath

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