



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

Submission Details

Ref	VAR7-091907
Who Are You?	Private Individual
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Submitted Time:	September 18, 2026 10:17 AM

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 4: Newtownmountkennedy

Write your observations here:

Observation on Proposed Variation No. 7 to the Wicklow County Development Plan 2022–2028

Re: Newtownmountkennedy Town Plan – Proposed Variations NT 1 (Monalin / Season Park, AA1) and NT 2 (Moneycarroll, SLO2), pages 67–73.

Name: Jamie O'Toole

I wish to make the following observation on the proposed variation as it applies to Newtownmountkennedy.

1. No new community or education land is proposed

NT 1 proposes approximately 11.7ha of new residential zoning within Action Area 1, together with 4.3ha of active open space and 1.3ha of OS1. The summary table on page 67 shows no new community and education (CE) zoning whatsoever arising from this variation. Further, the amended AA1 text on page 71 reduces the undeveloped land reserved for community and educational use from c. 1.2ha to c. 0.8ha.

It is not consistent to significantly expand the residential capacity of the Action Area while simultaneously reducing the land reserved for possible school expansion. I request that the 1.2ha CE reserve be retained at a minimum, and that additional CE zoning be provided within AA1 commensurate with the increased housing yield.

2. No social infrastructure or retail assessment is required, unlike comparable sites in the same variation

Elsewhere in this same variation, the Council requires that new residential areas carry out a Social Infrastructure Audit and a Retail Impact Assessment, and provide a local community focal point including small-scale convenience retail and services determined by that audit. This requirement is applied to sites at Wicklow Town–Rathnew (pages 16 and 24) and Greystones–Delgany (page 41). A community services audit is likewise required at Kilcoole (SLO6, page 66).

No equivalent requirement is proposed for Newtownmountkennedy, despite NT 1 being one of the larger residential expansions in the variation. I request that

the same Social Infrastructure Audit and Retail Impact Assessment requirement be inserted into the AA1 objectives, and that the audit specifically assess existing capacity in primary and post-primary school places, childcare places, GP and dental services, and convenience retail, rather than assessing need in isolation from what already exists.

3. Childcare provision is not tested against existing capacity

The AA1 objectives require childcare at a ratio of 20 places per 75 units, delivered by the occupation of the 75th house. This is a development-by-development standard. It does not assess whether existing creches in Newtownmountkennedy have capacity, and it permits 74 households to be occupied before any facility is delivered. Existing facilities in the town are already heavily subscribed.

I request that childcare provision in AA1 be assessed cumulatively across the Action Area and against existing town-wide capacity, and that delivery be required in the first phase of development, as the Council has required at Kilcoole (SLO6, page 66), rather than at the 75th occupation.

4. School capacity should be confirmed before further residential phases

The amended objectives correctly make further development conditional on delivery of the distributor road, the L-1037 upgrade, the second active open space and the community building. No equivalent condition attaches to school capacity. Sports facilities and open space are subject to detailed sequencing triggers; primary and post-primary school places are not.

I request that the AA1 objectives require the Planning Authority to obtain and publish a written response from the Department of Education, and from the HSE in respect of primary care provision, on the capacity implications of the full build-out of AA1, and that residential phasing be aligned to confirmed school place provision.

5. Traffic and junction capacity beyond the Action Area

The conditions relating to the distributor road and the upgrade of the L-1037 to Fisher's junction are welcome. However, they address circulation within and immediately adjoining the Action Area only. No assessment is proposed of the

cumulative impact of the additional housing on the R772 through the village, on the N11 junctions, or on school-related traffic at peak times.

I request that the variation require a cumulative transport assessment covering the R772 and N11 junctions, taking account of all committed and proposed development in the settlement.

6. NT 2 – loss of employment land

NT 2 proposes to change c. 1.4ha from Employment to Town Centre use. While the requirement that 25% of floor area be commercial and community use is welcome, the objective does not specify that this floor space should address identified service deficits. I request that the SLO2 wording expressly include health services (GP, dental, pharmacy) and convenience retail among the uses to be provided, and that this non-residential floor space be delivered in tandem with, and not after, the residential element.

Conclusion

I am not opposed in principle to the growth of Newtownmountkennedy. My concern is that this variation increases residential capacity substantially while providing no new community or education land, reducing the school expansion reserve, and omitting the social infrastructure assessment requirements the Council has applied to comparable sites elsewhere in the same document. I request that the variation be amended as set out above.

Yours sincerely,
Jamie O'Toole