



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

8th October 2026

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

**Re: Proposed Variation No. 7 to the Wicklow County Development Plan 2022-
2028**

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 7 (proposed Variation) to the Wicklow County Development Plan 2022-2028 (Development Plan).

As Wicklow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, submissions may include recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Variation, the Office will carry out a further assessment under section 63 of the Act.

1. Overview

The proposed Variation introduces a number of changes to the Development Plan to support the implementation of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines). These include:

- updates to the Development Plan's Core Strategy (Volume 1, chapter 3) - Part 2: Consequent Changes to Chapter 3; and
- proposed changes to land use zoning objectives and relevant Specific Local Objectives (SLO) - Part 1: Settlement Plans and Zoning Maps.

The Office acknowledges the background context to this proposed Variation and notes that the Planning Authority previously addressed the Housing Growth Guidelines through Variation No. 5 to the Development Plan. In its consideration of that process, the Office highlighted a number of strategic matters requiring further attention, including the provision of additional residential lands, the delivery of the Fassaroe strategic development area, the progression of the Call for Sites process, and the advancement of a further variation to support the release of additional housing lands.

Given the strategic importance of the Fassaroe Lands to housing delivery within the Dublin Metropolitan Area and separate from the consideration of this proposed Variation, the Office wishes to take this opportunity to request a further update regarding progress on the preparation and delivery of the Infrastructure Strategy and any related implementation measures.

Overall, the Office welcomes the substantial progress made by the Planning Authority in addressing the key matters previously identified by the Office. In particular, the Office acknowledges the completion of the Call for Sites process, the removal of barriers to the release of additional residential lands, and the identification of further residential development opportunities within the Dublin Metropolitan Area.

Notwithstanding these positive measures, the Office remains concerned that the overall distribution of additional residential lands does not fully align with the

settlement hierarchy and the objective of directing growth to the most sustainable locations, particularly within the Dublin Metropolitan Area. While the Office welcomes the zoning of additional residential lands in Bray and Greystones-Delgany, these lands account for only a relatively limited proportion of the overall additional capacity identified in response to the Housing Growth Guidelines. In contrast, a significant share of the additional residential lands is proposed within lower-tier settlements and outside the Dublin Metropolitan Area. The Office therefore considers that further opportunities should be examined to strengthen housing land supply within higher-order settlements, particularly those served by existing or planned high-quality public transport, in order to achieve a more balanced and sustainable distribution of growth.

The Office also considers that additional evidence in relation to land capacity and deliverability, including through the preparation of Settlement Capacity Audits (SCAs), would strengthen the justification for the proposed zoning strategy. Furthermore, the Office has identified a number of matters relating to transport connectivity, accessibility and flood risk management that warrant further consideration.

The following recommendations and observations set out below are intended to support the Planning Authority in further strengthening the proposed Variation and ensuring its effective implementation:

Subject	Recommendation	Observation
Implementation of housing growth requirements	Recommendation 1	Observation 1
Integration of transportation and land use planning	Recommendation 2	-
Flood risk management	-	Observation 2

2. Implementation of housing growth requirements

While the Office welcomes the Planning Authority's overall response to the concerns raised through Variation No. 5 to the Development Plan, a number of matters in

relation to the implementation of the Housing Growth Guidelines require further consideration.

In regard to the distribution of additional residential lands, arising from the housing growth requirement uplift, the Office notes that only 20% of additional lands identified through the proposed Variation are located within the Dublin Metropolitan Area, namely Bray and Greystones-Delgany. This contrasts with approximately 50% of additional lands proposed being located within lower Level 4 (Self Sustaining Towns) and Level 5 (Towns) settlements outside the Metropolitan area, in less sustainable locations such as Ashford, Rathdrum and Dunlavin.

Furthermore, the Office notes that the majority of additional residential lands identified within the Dublin Metropolitan Area is concentrated on a single strategic site GSD 2, at Charlesland in Greystones-Delgany. While the Planning Authority may have additional information and insight in terms of the activation of these lands, there is a continued risk that this level of reliance on one site may not provide sufficient flexibility, resilience or choice in the housing land supply pipeline. Accordingly, the Office considers that a broader distribution of residential lands across further number of sites would help support certainty regarding the short to medium term provision both settlements.

While the Office acknowledges the findings of the Call for Sites Assessment Report and accepts that a range of factors may have constrained the selection of lands within the Dublin Metropolitan Area, including existing zoning provisions and site-specific constraints relating to flood risk, access and heritage, it notes that approximately 50 sites were proposed through the process within the Metropolitan Area, but were not subsequently zoned as part of the variation.

As such, the Office remains concerned that the overall approach and distribution of additional residential lands does not achieve an appropriate balance between the Metropolitan Area and the remainder of the county. The Office therefore recommends that the Call for Sites Report (appendix D) is re-examined with a view to facilitating additional growth within, or in close proximity to, the Dublin Metropolitan Area, consistent with the objective of directing development to the most sustainable and accessible locations.

Recommendation 1 - Implementation of housing growth requirements

Having regard to and having considered:

- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;
- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy Objectives 1 and 2, and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPO 97 of the NPF for planned growth in the Metropolitan area along existing planned high-capacity public transport corridors in accordance with the principles of Transport Orientated Development; and
- the Development Plans, Guidelines for Planning Authorities (2022),

the Office recommends that the Planning Authority reviews the Call for Sites Report (appendix D) and reconsiders the opportunities for additional residential lands within the Dublin Metropolitan Area, particularly where the lands have the potential to be developed in the short-term.

2.1 Core Strategy and Settlement Capacity Audit

Section 2.4 of the Housing Growth Guidelines requires planning authorities to undertake an SCA to identify zoned serviced or serviceable lands with residential development potential, specifying enabling infrastructure, for example wastewater network or treatment infrastructure, energy infrastructure, roads or public transport capacity and in the case of enabling social infrastructure, school provision and community facilities.

While the Office acknowledges that the Call for Sites Assessment Report (appendix D) provides an assessment of submitted sites and sets out the reasons why certain lands were not selected for zoning, the variation is not supported by SCAs for each relevant settlement. Consequently, it is unclear whether the 53 proposed zoning

designations are supported by adequate infrastructure and are capable of delivery within the required timeframes. The Office therefore recommends that this matter is addressed and that Planning Authority reviews and updates accordingly.

The Office further notes, as previously recommended in relation to Variation No.5 to the Development Plan, that while the Planning Authority has identified the site area of each proposed zoning within the proposed Variation section, detailed information regarding the anticipated density ranges as set out in Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) would provide clarity regarding the capacity of the proposed zoning and the housing outputs underpinning the core strategy.

Accordingly, the Office considers that the site-specific density assumptions and estimated housing yields should be incorporated into core strategy table 3.5 or, alternatively, provided through a core strategy addendum to support a more robust assessment of residential land capacity and housing delivery potential.

Observation 1 - Implementation of Housing Growth Guidelines - Core Strategy / Settlement Capacity Audit

Having regard to and having considered:

- the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines), including Policy Objectives 1 and 2, and section 2.4 to incorporate the objectives of the Housing Growth Guidelines into development plans;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPOs 101, 102 and 103 of the NPF to consider serviceability of land zoned for development;
- the Development Plans, Guidelines for Planning Authorities (2022); and
- Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024),

the Planning Authority is advised to:

- (i) provide a Settlement Capacity Audit for 15 settlements and 53 new proposed residential zonings which includes water and wastewater capacity, accessibility to existing and proposed pedestrian and cycling routes, public transport and proximity to the town and village centres; and
- (ii) update and provide further details in the core strategy table 3.5 or provide a new addendum to include site area (hectares), density (density per hectare) to be applied and potential housing yield (units) for each proposed zoning with updated totals where necessary for each settlement.

3. Integration of transportation and land use planning

The Office notes that while the Planning Authority has prepared Concept Plans and SLOs for a number of newly proposed residential zonings, these objectives lack sufficient detail regarding measures to enhance connectivity and permeability for walking, cycling and access to public transport networks. Furthermore, the Office notes there are a number of Local Transport Plans (LTPs) for high level settlements such as Wicklow Town - Rathnew, Bray, Greystones-Delgany are at different stages of progression and incomplete, therefore, the Office would positively support the achievement of modal shift objectives by encouraging greater use of sustainable transport modes and reducing dependence on the private car. As such, the Office has recommended that the Planning Authority provides a timeline for the progression and completion of these LTPs.

In relation to the proposed residential zoning BR 3, Fassaroe Lands, the Office welcomes the zoning in principle. However, the lands should be integrated into the wider Fassaroe Masterplan area and released in accordance with the overarching phasing strategy which is set out in the Bray Environs Local Area Plan 2009-2017 and the National Transport Authority's Bray and Environs Transport Study (BETS). This is necessary to ensure the coordinated delivery of development and supporting infrastructure and to avoid a piecemeal pattern of development. Accordingly, the Office recommends that the Planning Authority includes a detailed narrative which addresses this requirement.

Similarly, with regard to the proposed residential zoning, BLS 1, Burgage More (West) Blessington, the Office welcomes the zoning of these lands for residential in principle. While SLO 11 provides some information regarding access arrangements, it does not clearly demonstrate how the development will integrate into the local roads network in the short term and ensure permeability and accessibility to walking, cycling and public transport shall be required. As such, the Office recommends that this matter is addressed.

Recommendation 2 - Integration of transportation and land use planning

Having regard to the need to ensure the integration of land use and sustainable transportation, and having considered:

- NPO 37 of the NPF to ensure the integration of safe and convenient alternatives to car usage;
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year, and the National Investment Framework for Transport Ireland (2021);
- RPOs 8.1 and 8.4 of the RSES to integrate land use and transport planning;
- RPO 8.6 of the RSES to prepare and implement Local Transport Plans (LTPs) which shall encourage a travel mode shift from private vehicular use towards sustainable travel modes of walking, cycling and use of public transport; and
- the National Transport Authority's Greater Dublin Area Transport Strategy 2022-2042,

the Office recommends that the Planning Authority:

- (i) amends and include additional narrative to all relevant Specific Local Objectives (SLOs) to facilitate improved connectivity and permeability for walking, cycling and access to public transport networks;

- (ii) provide a timeline for the preparation and completion of LTPs for Wicklow Town-Rathnew, Bray and Greystones-Delgany in line with the Area Based Transport Assessment (ABTA) approach;
- (iii) amend Action Area Plan 1, Fassaroe, to include specifically zoning BR 3 Bray, Fassaroe Lands and provide that lands be integrated into the wider Fassaroe Masterplan, Bray Environs Local Area Plan 2009-2017 and the Bray and Environs Transport Study (BETS) and ensure this zoning is only released as part of the phasing plan; and
- (iv) review zoning BLS 1, Burgage More (West) Blessington to amend SLO 11 to provide clarity in regard to accessibility to local roads to ensure improved permeability and delivery in the short term.

4. Flood risk management

In relation to flood risk and climate change, the Office notes that while the Planning Authority has zoned the majority of lands overlapping future flood scenario mapping for water compatible uses, including OS1 Open Space, OS2 Natural Areas and AOS Active Open Space, there appears to be some areas of overlap remaining on the proposed GSD 2 New Residential zoning, at Charlesland, Greystones-Delgany.

The Office further notes that section 6 of the Strategic Flood Risk Assessment (SFRA) (Flood Risk and Climate Change) indicates that where lands proposed to be zoned are affected by future scenario flood mapping, sites are generally of sufficient scale to avoid development areas at risk area through the application of the sequential approach. Accordingly, the Office advises that this matter should be reviewed and mapping implications addressed in respect of zoning GSD 2, Greystones-Delgany including the strengthening of the related SLO 3 to ensure this constraint is clearly identified and addressed through the proposed Variation.

The Office notes that only one SLO 11 for zoning WR 4 for Wicklow Town - Rathnew, references to Planning Authority's Sustainable Urban Drainage (SuDS) policy and requires the preparation of a Surface Water Management Plan. The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines) recommends that the SFRA provides guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key

development sites and also identifies where integrated and area-based provision of SuDS and green infrastructure are appropriate to avoid reliance on individual site-by-site solutions. Given that the proposed Variation proposes a significant number of large residential zonings, many of which also adjoin existing zoned lands, the Office advises that opportunities for integrated and area-based provision and area-based SuDS provision should be identified within the SFRA and incorporated where appropriate, through SLOs.

The Office also advises that there is a mapping anomaly within the SFRA mapping relating to proposed zoning WR 8, Wicklow-Rathnew. A strip of land along the northern boundary of the zoning adjoining an existing watercourse, is identified as OS2 Natural Areas zoning in the main variation document, however this zoning is not reflected in the corresponding SFRA mapping. As such, the Office advises that this is reviewed and corrected by the Planning Authority.

Observation 2 - Flood Risk Management

Having regard to flood risk management and having considered:

- NPO 78 of the NPF to take account of the potential impacts of climate change on flooding and flood risk and to promote sustainable development by ensuring flooding and flood risk management informs place-making;
- RPO 7.12 of the RSES to consider future appropriate land-use policies in accordance with the requirement of The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Planning Authority is advised to:

- (i) review and update future scenario mapping for zoning GSD 2, Charlesland, Greystones-Delgany;
- (ii) revise and include reference to any future scenario mapping constraints at the associated Specific Local Objective (SLO) 3 for Zoning GSD2 Charlesland, Greystones-Delgany;

- (iii) amend the Strategic Flood Risk Assessment (SFRA) and appropriate SLOs to incorporate an integrated and area-based provision of Sustainable Urban Drainage Systems (SuDs) and green infrastructure related to existing and proposed new zoned lands where appropriate in order to avoid reliance on individual site-by-site solutions; and
- (iv) review and update the SFRA map for zoning WR 8, Ashtown Lane, Wicklow-Rathnew to ensure zoning OS2 Natural Areas along the northern strip, which includes an existing watercourse, is replicated with the main zoning map in the Variation document.

5. Next Steps

The Office requests that the Planning Authority addresses the recommendations and observations set out above.

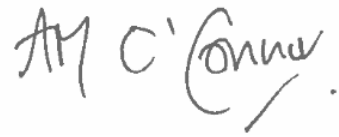
As part of this process, the Chief Executive's report to the elected members, prepared under section 58(11) of the Act should summarise the Office's recommendations and outline how it is proposed to address them.

Following adoption of the Variation, the Planning Authority is required to:

- provide the Office with a copy of the adopted Variation, together with any submissions received from the Minister, regional assemblies, and the National Transport Authority during the plan preparation process, within **one week** of adoption;
- inform the Office, **as soon as practicable**, where the elected members decide not to comply with a recommendation, including the reasons for the decision of the elected members; and
- publish notice of the Variation within **one week** of adoption, confirming that the Development Plan as varied will be available for inspection (online and at a specified location) no later than **five weeks** after adoption.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, reading "AM O'Connor". The signature is written in a cursive, slightly slanted style.

Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
