



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

21st November 2025

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

**Re: Proposed Material Alterations to Proposed Variation No. 4 to the Wicklow County
Development Plan 2022-2028**

A chara,

Thank you for your authority's work in preparing the Proposed Material Alterations (material alterations) to the Proposed Variation No. 4 (proposed Variation) to the Wicklow County Development Plan 2022-2028 (County Development Plan).

As Wicklow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and (2) of the Planning and Development Act 2000, as amended (the Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to

ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the Variation has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office notes that the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Guidelines) were issued by the Minister for Housing, Local Government and Heritage after the initial public consultation period for the proposed Variation.

The Housing Growth Guidelines require planning authorities to vary their development plans to reflect the housing growth requirements set out in the first appendix to the Housing Growth Guidelines, and to provide for additional provision in terms of residential zoned land.

The Office furthermore understands that a process to implement the Housing Growth Guidelines is currently being undertaken by the Planning Authority.

The recently published housing plan, Delivering Homes, Building Communities 2025-2030, also emphasises the need for a strong pipeline of zoned and serviced land to support the delivery of 300,000 new homes to 2030, stating:

...Government will ensure that new homes are built in the right locations, with the necessary services and community facilities in place, in keeping with our climate action goals, and the wider spatial growth of the State.

In this context, the Office notes that the proposed material alterations include additional Residential Phase 1 zonings in Kilcoole, which are less favourably located in terms of access to public transport, services, and amenities than Greystones. Furthermore, no additional lands are identified in Greystones itself. This approach risks pushing much-

needed housing to more peripheral locations, which are farther from existing and future services and amenities, and are more car-dependent with consequent implications for carbon emission and targets under the Climate Action Plan 2025.

Accordingly, the Office strongly advises the Planning Authority to give urgent consideration to the supply of further zoned land in Greystones as part of the forthcoming variation to implement the Housing Growth Guidelines. At a minimum, this should include rezoning Residential Phase 2 lands as Phase 1 to provide flexibility in site delivery and maintain a strong pipeline for housing delivery.

In relation to Recommendation 1 (Residential Zoning) of the Office's submission on the proposed Variation, the Office notes the response of the Chief Executive which provides clarity regarding the serviced status of the proposed zoned land.

With regard to Recommendation 2 (Transport and Accessibility), the Office welcomes the Planning Authority's commitment to carrying out a Local Transport Plan (LTP) for the draft Greystones-Delgany and Kilcoole Local Planning Framework. Once completed, the Planning Authority should integrate the LTP into the zoning map via section 13 of the Act and update the County Development Plan as required. It is critical that this evidence-based assessment informs the plan and provides a clear rationale for decision making.

The Office also welcomes the update of the Strategic Flood Risk Assessment (SFRA) to consider the National Catchment-based Flood Risk Assessment and Management coastal dataset and its inclusion in the SFRA Addendum 1 (Recommendation 3 – Flood Risk Management).

Summary

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the chief executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
