

**DRAFT ARKLOW AND ENVIRONS  
LOCAL AREA PLAN**

**CHIEF EXECUTIVE'S REPORT  
ON SUBMISSIONS  
MADE TO THE  
DRAFT PLAN**



WICKLOW COUNTY COUNCIL  
SEPTEMBER 2017

## PART I: INTRODUCTION

### 1.1 Introduction

This Chief Executive's Report is submitted under Section 20(3)(c) of the Planning and Development Act 2000 (as amended). It is part of the formal statutory process of the preparation of a Local Area Plan. This Report contains the following:

- (i) a list of the persons or bodies that made submissions,
- (ii) a summary of the issues raised by them,
- (iii) the opinion of the Chief Executive in relation to the issues raised, and his recommendations in relation to the proposed LAP, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

In accordance with Section 20 (3)(cc) this report is required to summarise the issues raised and the recommendations made by the **NTA (Submission A2)** and outline the recommendations of the Chief Executive in relation to the manner in which these issues and recommendations should be addressed in the proposed local area plan.

The members of the planning authority are required to consider the proposal to make the local area plan and this report of the Chief Executive.

### 1.2 Next steps

Following consideration of this Chief Executive's Report, the local area plan shall be deemed to be made in accordance with the recommendations of the Chief Executive as set out in this Report, **6 weeks after the furnishing of the report to the members**, unless the planning authority, by resolution, decides to either

- (i) make or amend the plan otherwise than as recommended in this report, or
- (ii) not make the plan.

Where, following consideration of the Chief Executive's Report, it appears to the members of the authority that the Draft LAP should be altered, and the proposed alteration would if made be a material alteration of the draft LAP, the Planning Authority shall, not later than 3 weeks after the passing of a resolution publish notice of the proposed material alteration in one or more newspapers circulating in its area, and send notice of the proposed material alteration to the Minister, the Board and the prescribed authorities (enclosing where the authority considers it appropriate a copy of the proposed material alteration).

**In the event that material amendments to the draft plan are proposed**, the planning authority shall determine if a Strategic Environmental Assessment and/or an Appropriate Assessment as the case may be, is or are required to be carried out as respects one or more than one proposed material amendments to the Draft LAP.

The Chief Executive shall, not later than 2 weeks after a determination that SEA/AA of a material amendment is required, specify such period as he or she considers necessary following the passing of the resolution, as being required to facilitate an assessment. The planning authority shall carry out an assessment required of the proposed material amendment of the draft local area plan within the period specified by the Chief Executive.

The planning authority shall publish notice of the proposed material amendment, and where appropriate in the circumstances, the making of a determination that a SEA/AA is required. The planning authority shall carry out the assessment within the period specified by the Chief Executive.

The notice relating to material amendments shall state –

- (i) that a copy of the proposed material amendment and of any determination by the authority that a SEA/AA is required may be inspected during a stated period of not less than 4 weeks, and
- (ii) that written submissions or observations with respect to the proposed material amendment and of any determination by the authority that a SEA/AA is required, may be made to the planning authority and shall be taken into consideration before the making of any material amendment.

### 1.3 Consultation Process & List of Submissions

The Draft Arklow and Environs Local Area Plan 2017-2023 was on public display during the period 5<sup>th</sup> July 2017 to 18<sup>th</sup> August 2017. A Public Open Day was held in Arklow Municipal District Office on 20<sup>th</sup> July 2017 where the public attended and interacted with the plan team. During this period, a total of 29 submissions were received.

#### Group A Prescribed bodies

No.	Organisation	Representative
A1	Department of Housing, Planning and Local Government	Colin Ryan
A2	National Transport Authority	David Clements
A3	An Taisce	Doireann Ni Cheallaigh
A4	Department of Education and Skills	Veronica Kelly
A5	Environmental Protection Agency	Cian O Mahony
A6	Irish Water	Matthew Collins
A7	Transport Infrastructure Ireland	Michael McCormack

#### Group B General Submissions (Public individuals and groups)

No.	Group	Representative
B1	Arklow & District Chamber	Donal Murray
B2	Arklow Active Retirement	Anne O'Connell
B3	Arklow Heritage/Nature Walks Development Company Limited	Irene Sweeney
B4	Arklow Positive Ageing	Maria Neary
B5	Arklow Shipping	Joe Nelson
B6	Balfe, Myles	Catherine Mara
B7	Birmingham, Danny & Shane	John L. O'Hanlon & Assoc.
B8	Brennan, Patsy	
B9	Dawnhill Properties Limited and Windhill Properties Limited	Trevor Sadler
B10	Friends of Glenart	7 Signatures
B11	Gerard Gannon Properties	Michael Connolly Architects
B12	Heffernan, Ian (agent) on behalf of unnamed landowner	
B13	Holfeld, Edmund /Avoca River Park Ltd	PD Lane Associates
B14	Hopper, Colette	
B15	Joyce, Deirdre & Veale (nee Meehan), Deborah	
B16	Kennedy, Michael, Robert & Alan	
B17	O'Toole, Jonathon	

B18	Quirke, Mamie & Sean	
B19	Rappel Enterprises Ltd	Conor McCarthy & Assoc.
B20	Roadstone Ltd	SLR Consulting Ireland
B21	Yellow Lane Business Park Ltd	Fintan Morrin
B22	Young, Allen and Marian	Conor McCarthy & Assoc.

#### 1.4 Considering the Submissions

The written submissions have been analysed by the Planning Executive of the County Council. The individual submissions are summarised and the opinion and recommendations of the Chief Executive have been given in Part III. The Chief Executive has made a number of recommendations, they are outlined in Part II in the order that they will appear in the LAP.

Amended / new text in red, deleted text in ~~blue~~

Each amendment has been assessed for impacts on the environment and / or impacts on designated Natura 2000 sites. At this stage no proposed amendment considered to give rise to any alterations to the original assessment. Section 1.2 is still applicable should a proposed material amendment be made.

This Report is submitted to the Members for their consideration.

#### 1.5 Guidance for the Elected Members

Responsibility for approving a local area plan, including the various policies and objectives contained within it, in accordance with the various provisions of the Planning and Development Act 2000 as amended, rests with the elected members of the planning authority, as a reserved function under Section 20 of the Act.

In making the local area plan, the elected representatives, acting in the interests of the common good and the proper planning and sustainable development of the area, must, in accordance with the "Code of Conduct for Councillors" prepared under the Local Government Act 2001, carry out their duties in this regard in a transparent manner, must follow due process and must make their decisions based on relevant considerations, while ignoring that which is irrelevant within the requirements of the statutory planning framework.

The members, following consideration of the draft plan and this report, shall decide whether to adopt the local area plan or to amend the plan.

## PART II: CHIEF EXECUTIVE'S RECOMMENDATED AMENDMENTS

### Recommendation No. 1

1. Insert the following text and carry out any changes consequent

#### Chapter 2

#### Population and Housing

#### Section 2.1 – Population & Housing

#### Population & Housing Profile

The CSO provides the result of each census in a number of different geographical units including 'electoral divisions', 'legal towns', 'census towns' and 'small areas'.

#### Arklow Town (Census Town)

	2006	2011	2016*
<b>Arklow (legal town)</b>	11,712	12,770	-
<b>Arklow (census town<sup>1</sup>)</b>	11,759	13,009	13,163

\* With regard to the 2016 figure, the CSO states the following: '80 legal towns were abolished under the Local Government Reform Act 2014. Census towns which previously combined legal towns and their environs have been newly defined using the standard census town criteria (with the 100 metres proximity rule). For some towns the impact of this has been to lose or a and population, compared with previous computations'.

#### Arklow EDs (within or crossing plan boundary)

	2006	2011	2016
<b>Arklow No. 1 Urban</b>	9128	9817	9956
<b>Arklow No. 2 Urban</b>	2584	2953	3013
<b>Arklow Rural</b>	1067	1301	1386
<b>Kilbride</b>	825	909	892
	<b>13,604</b>	<b>14,980</b>	<b>15,247</b>

#### Arklow SAPS<sup>2</sup> (within or crossing plan boundary)

	Small Area ID	2006	2011	2016
<b>Arklow No. 1 Urban</b>	257004001, 257004002, 257004003, 257004004, 257004005, 257004006, 257004007, 257004008, 257004009, 257004010, 257004011, 257004012, 257004013, 257004014, 257004015, 257004016, 257004017, 257004018, 257004019, 257004020, 257004021, 257004022, 257004023, 257004024, 257004025, 257004026, 257004027, 257004028, 257004029, 257004030, 257004031, 257004032, 257004033, 257004034, 257004035, 257004036, 257004037, 257004038	9128	9817	9976
<b>Arklow No. 2 Urban</b>	257079001, 257079002, 257079003, 257079004, 257079005, 257079006, 257079007, 257079008, 257079009, 257079010, 257079011	2584	2953	3013
<b>Arklow Rural</b>	257003002, 257003004, 257003005	625	764	822
<b>Kilbride</b>	257047001 & 257047002	627	689	672
<b>Total</b>		<b>12,964</b>	<b>14,223</b>	<b>14,483</b>

<sup>1</sup> Population within legally defined boundary + population of (CSO defined) suburbs or environs

<sup>2</sup> Small Area Population Statistics

Unfortunately none of these geographical units match the Local Area Plan boundary. However, using the CSO data, cross referenced with GeoDirectory data, the estimates of 2016 population and housing stock with the plan area are as follows:

	EXISTING POPULATION	EXISTING HOUSING STOCK
2016	13,313	5,396

Table 2.2 Arklow population and housing stock 2016 (Source: WCC Forward Planning)

### Population & Housing Targets

The 2022, 2025 and 2028 population and housing targets for Arklow are provided in the Core Strategy of the County Development Plan.

While this plan will have a duration of 6 years initially (~~2017-2023~~), ~~2018-2024~~, the provisions of the Planning Act allow in certain circumstances for the duration of local area plans to be extended to 10 years i.e. up to ~~2027~~ 2028. In this context, it is considered appropriate at this stage that the plan shall put in place a structure to meet the 2025 population and housing target, with 3 years additional zoning 'headroom' to ensure that there will be no lack of zoned housing land (i.e. the 2028 target will be utilised). "Headroom" or "market factor" is 'extra' land that is zoned over and above the minimum amount needed to accommodate the 2025 population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise.

~~The 2011 population and housing unit figures used in the 2016 County Development Plan are derived from the 2011 Census, as the full results of the 2016 Census were not available at the time of the making of the County Development Plan, and similarly were not available at the time of production of this draft plan. As the Census 'town boundaries' do not always necessarily match Wicklow County Council's plan boundaries, the Census figures have been amended where required, using additional data sources such as the CSO 'Small Area Population Statistics' and the An Post GeoDirectory.~~ The housing stock requirement is based on these population targets, a projected decreasing number of occupants of each house and built in assumptions about the level of vacancy / second homes<sup>3</sup>.

	EXISTING POPULATION / POPULATION TARGET	EXISTING HOUSING STOCK / HOUSING STOCK REQUIREMENT	HOUSING UNIT GROWTH REQUIREMENT
2011	13,066	5,459	
2022	19,494	7,509	+2,050
2025	21,247	<b>9,838</b>	+4,379
2028	23,000		<b>+5,726</b>

Table 2.2 Arklow population and housing targets (Wicklow County Development Plan 2016)

	EXISTING POPULATION / POPULATION TARGET	EXISTING HOUSING STOCK / HOUSING STOCK REQUIREMENT	HOUSING UNIT GROWTH REQUIREMENT
2016	13,313	5,396	
2022	19,494	7,509	+2,113
2025	21,247	<b>9,838</b>	+4,442
2028	23,000	<b>11,185</b>	<b>+5,789</b>

Table 2.3 Arklow population and housing targets

<sup>3</sup> For more information, see Wicklow County Development Plan, Core Strategy

This LAP provides adequate zoned land to ~~yield a potential additional housing supply of c. 5,726 units~~ meet this housing target.

## Recommendation No. 2

To insert the following text:

### Chapter 5 Key Area's Arklow Town Centre Strategy Objectives

**VP1** To maintain the Main Street in the short to medium term (until alternative orbital routes are developed) as the principal vehicular route through the town centre and to maintain the main vehicular routes to the waterfront area along the quays; to exploit any opportunities that arise to improve safety for both pedestrians and vehicles in the Town Centre and Waterfront area.

## Recommendation No. 3 (a), (b) and (c)

To include the following objectives:

### Chapter 5 Key Area's Arklow Town Centre Strategy Objectives

#### 3 (a)

**VPXX** To seek to prepare an overall Main Street enhancement scheme to improve the street environment for all users, which may include widened footpaths, cycle facilities (where feasible), public realm improvements, and possibly accompanied by reduced speed limits.

#### 3 (b)

**WZXX** To facilitate the development of new opportunities for pedestrian and cycle links from the Waterfront to the town centre.

#### 3 (c)

**WZXX** In conjunction with the National Transport Authority, to carry out a feasibility study to investigate the possibility of connecting each side of the Waterfront zone.

## Recommendation No. 4

Amend objective IT9 as follows:

### Chapter 9 Infrastructure, Transportation & Movement Objectives

**IT9** To facilitate the construction of a Southern Port Access Road (SPAR) linking the Wexford Road to the Action Areas at Tinahask, the Roadstone Quarry and the Waterfront Zone, incorporating a link to form a primary distributor route for HGV traffic to the existing port. The design of the road including its alignment and boundary treatment will be carried out in such a manner as to ensure minimal impact on Arklow Golf Club and the Roadstone Quarry. Possible future connections of the SPAR to the Clogga Road (at Kish / Rock Big) may also be considered.

**Recommendation No. 5**

To include the following objective:

**Chapter 9 Infrastructure, Transportation & Movement  
Infrastructure, transportation & movement objectives**

**ITXX** To facilitate the implementation of the GDA Cycle Network Plan.

**Recommendation No. 6**

Amend objective HT1 as follows:

**Chapter 10 Built & Natural Heritage  
Heritage Objectives**

**HT1** To maintain the favourable conservation status of all proposed and future Natural Heritage Areas (NHAs) in the plan area in particular the Arklow Marsh **and to support environmentally sensitive measures to enhance the understanding and enjoyment of such natural areas**'.

**Recommendation No. 7 (a) and (b)**

Amend Action Area 3 Kilbride as follows' and to make any changes consequent throughout the LAP:

**7(a)**

Amend the following text:

**Chapter 11 Zoning, Land Use and Action Areas**

**ACTION AREA 3 KILBRIDE**

This Action Area is located in the townland of Kilbride. This Action Area measures c. ~~66~~ 81ha and is bounded to the north by local secondary road L-6179 Ticknock – Kilbride (the Kilbride – old IFI plant road) to the east by existing developed areas mainly in residential and community / educational use, to the south by Arklow Marsh and to the west by the M11. This Action Area shall be developed as a mixed residential, community and open space zone in accordance with the following criteria:

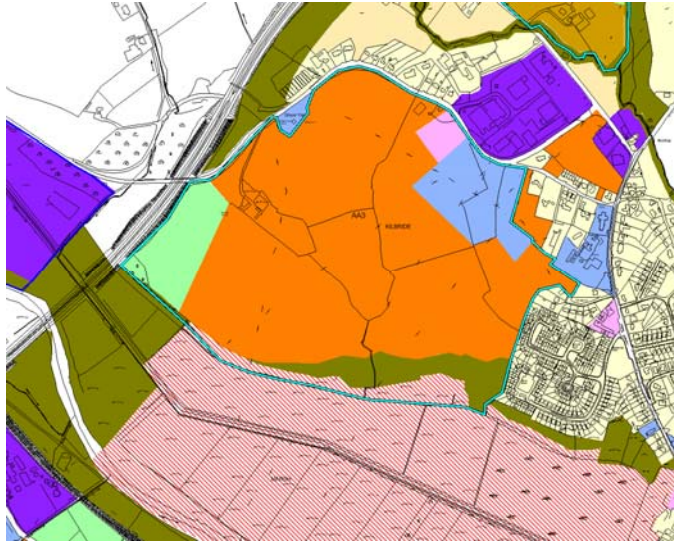
- To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceeding ~~150~~ 200 units), each containing materially different house designs within an overall unified theme.
- A minimum of ~~5.4~~ha shall be reserved for the provision of a school campus, subject to consultation and agreement with relevant stakeholders, including the Department of Education and Skills;



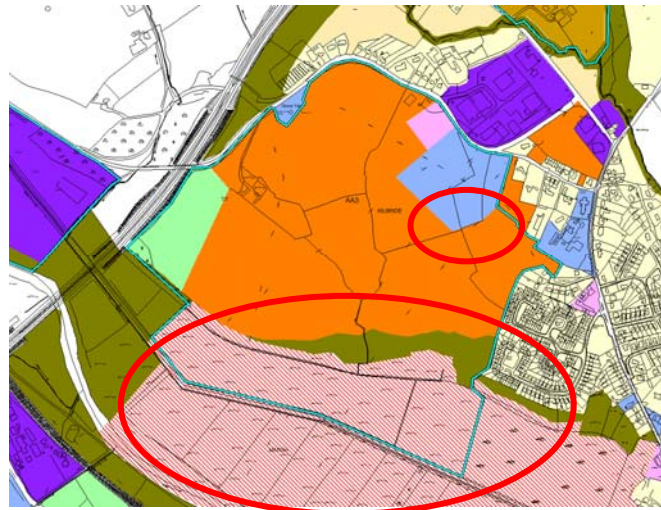
**7(b)**

Amend the Action Area boundary and zonings from:

**Land Use Zoning Map**



To:



(red circle highlighting AAP boundary change and zoning change)

**Recommendation No. 8**

Amend the zoning uses as follows:

**Chapter 11**

**Extractive industry (EX – U)** - Uses include extractive industry uses (The winning of all minerals and substances in or under land of a kind ordinarily worked by underground or open cast mining) and ancillary developments, including value added production, such as concrete, asphalt and block production.

**Recommendation No. 9**

Insert the following

## APPENDIX D

## PHASING AND IMPLEMENTATION

## INTRODUCTION

This appendix of the Local Area Plan deals with the infrastructure delivery schedule and sequential development phasing programme linked with necessary investment in infrastructure. The sequential development of the settlement, alongside the phased delivery of the necessary infrastructure including open space, waste water, drainage, educational and recreational amenities and local service provision, is key to the sustainable development of Arklow. It is critical that the Local Area Plan ensures that development within the Local Area Plan lands progresses in an ordered way which avoids 'leapfrogging' to peripheral areas that are geographically isolated from the existing settlement and infrastructural provision.

In order to ensure the successful delivery of the objectives of this plan, Wicklow County Council takes a positive proactive approach in active plan management in order to expedite the delivery of new homes as part of the new residential neighbourhoods planned within the Local Area Plan. Wicklow County Council liaises with all relevant authorities in a collaborative process to resolve any potential blockages to deliver residential development. Further to this any sites in Arklow in need of development or renewal within the Town Centre (TC), Waterfront (WZ) and Residential zones will be examined in order to determine if there are sites where the Vacant Site Levy should be applied.

## INFRASTRUCTURE DELIVERY SCHEDULE

This section sets out the key infrastructure necessary, in a staged delivery schedule, in order to achieve the phased delivery of the objectives of this plan. This section focuses on the key road, recreational, community and educational infrastructure. It is acknowledged that there is a broad range of infrastructure necessary in order to enhance the services to the homes, businesses and schools of Arklow. The development and continued delivery of telecommunications, energy and Arklow Port is addressed under the County Development Plan and Wicklow County Council continues to liaise and work with the necessary telecommunications and energy providers of such infrastructure to continue to enhance these services. Arklow Port is a function of Wicklow County Council.

The lifetime of the Local Area Plan is six years. The delivery schedule is divided in to the following four phases as well as an on-going stage with delivery throughout the plan lifetime and beyond:

<u>Immediate term</u>	Year 1 and Year 2
<u>Short term</u>	Year 3 to Year 5
<u>Medium term</u>	Year 5 to Year 10
<u>Long term</u>	10 years plus
<u>On - going</u>	Through-out the plan lifetime and beyond

There are a number of stakeholders involved in the delivery of all the infrastructure projects. All projects are dependent on funding. There are also numerous other matters that need to fall in line in order for each infrastructure project to be delivered, like land acquisition, securing the appropriate planning approval, sourcing the funding, etc. One significant obstacle in the delivery of any new development in Arklow in the short term is the lack of a waste water treatment plant. New development is not encouraged in the absence of such a key piece of infrastructure; however once Irish Water has secured the appropriate permission for the plant, new development may be permissible with an occupancy holding condition until the plant is in operation. The resolution of waste water issues, in effect, removes the most fundamental blockage to commencing development, therefore following this resolution, the focus will be the establishment of sustainable and smarter travel patterns, including the delivery of new / upgrading of existing roads.

More local level infrastructure is to be provided within the key development parcels including school and crèche provision, neighbourhood centre facilities, pocket parks, cycle and pedestrian routes, civic spaces and public realm improvements. Wicklow County Council will work particularly with the Department of Education and Skills (DoEd) and individual developers to secure the co-ordinated delivery of essential school provision.

The LAP identifies a range of strategic and local infrastructure necessary to facilitate development in the Plan Area. The timely and co-ordinated delivery of such infrastructure across a number of state agencies will be a key focus of Wicklow County Council.

The key funding sources for the delivery of infrastructure are:

<u>Developer</u>	The developer of the land / infrastructure provides the funding to deliver the infrastructure or provides the infrastructure themselves.
<u>State</u>	LIHAF funding, Smarter Travel funding, Irish Water (IW), Transport Infrastructure Ireland (TII), National Transport Authority (NTA), OPW, Department of Education, LEADER/SICAP funding, other government departments, etc
<u>Wicklow County Council</u>	WCC Development contribution schemes, WCC Capital Works Programme, etc.

This schedule is a living programme. It will be reviewed at regular intervals to assess how the implementation is progressing, available resources and as new sources of funding and/or providers emerge.

Implementation & Infrastructure Delivery Schedule Table

<b>Infrastructure</b>	<b>Delivery Schedule</b>	<b>Funding</b>
<b>Transport</b>		
Southern Port Access Road	Medium term	Developer, State, WCC
Avoca River Bridge	Long term	Developer, State
Leinster Outer Orbital Route	Long term	State
Western distributor route	Medium term	Developer, State, WCC
Third interchange at Lamberton	Long term	State
Upgrading of bridge over railway line	Short term	Developer, State

from Knockmore to Tinahask		
Distributor road access between AA1 to AA2	Short term	Developer, State
General Road Improvements	On-going	Developer, State, WCC
General Footpath Improvements	On-going	Developer, State, WCC
General Cycle Improvements	On-going	Developer, State, WCC
General Car parking Improvements	On-going	Developer, State, WCC
<b>Sanitary Services</b>		
Wastewater Treatment Plant	Short term	State (IW)
Replace the combined surface water system with a separate network to the waste water	On-going	State (IW), WCC
Avoca River Flood Defence Scheme	Immediate - Short term	State (OPW), WCC
<b>Social Infrastructure</b>		
AOS at Churchview including e.g. MUGA	Medium term	Levies / Developer
AOS at AA1 Tinahask	Short term	Developer
AOS at AA2 Tinahask	Medium term	Developer
AOS at AA3 Kilbride	Medium term	Developer
AOS at AA4 Coolboy	Long term	Developer
Creche/ Childcare facilities	Short - Medium term	Developer
Community facilities (Audit required <sup>4</sup> )	Short - Medium term	Developer
School site in Kilbride	Immediate term	State (DoEd)
Future 2 Primary School sites and 1 Post Primary School site at AA1 & AA2 Tinahask Upper/ Money Big	Medium term	State (DoEd)
Graveyard	Immediate term	Developer / WCC

## PHASING

Accordingly, as set out in Chapter 11, the phasing of development will be linked with the overall development strategy for the Local Area Plan whereby the existing settlement will expand geographically from the centre, through the development of physically adjoining lands in a coherent manner. New development will integrate with the established settlement of Arklow and will be supported by the required infrastructure provision.

In order to fulfil the core strategy and the population and housing objectives of the Local Area Plan, the plan requires the key new residential areas of the town centre, waterfront, and 4 Action Area's to be developed as part of the future growth of Arklow.

<sup>4</sup> Where specified by the Planning Authority, new significant residential or mixed use development (This is determined to be any proposed development in: (a) settlement levels 1 to 4 of 150+ residential units, (b) settlement level 5 of 75+ residential units and (c) settlement level 6 of 30+ residential units.) proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

Phasing Schedule Table

	Area/Zone	Key Infrastructure to be delivered prior to the delivery of development
<b>PHASE ONE</b>	Town Centre (opportunity sites), Waterfront, Infill development,	1. Wastewater treatment plant.
	Action Area 1	<p>1. Wastewater treatment plant.</p> <p><i>Action Area 1 Phasing - The development of the AAP shall be delivered in phases such that the road infrastructure and active open space is provided in the first phase accompanied by no more than 50% of the residential development.</i></p> <p>2. Distributor road access from AA2</p> <p>3. School sites (in consultation with Dept of Education.) Note - the optimal location for a future school has been identified, and zoned CE and the lands reserved.</p> <p>4. Active Open Space</p>
	Action Area 2	<p>1. Wastewater treatment plant.</p> <p><i>Action Area 2 Phasing - The development of the Action Area shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure (providing access to the AA1 lands to the north) and local shops &amp; services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space, employment facilities and Southern Port Access link road shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).</i></p> <p>2. Upgrading of bridge over railway line from Knockrahen to Tinahask</p> <p>3. Distributor road access to AA1 and to the south</p> <p>4. School sites (in consultation with Dept of Education.)</p> <p>5. Active Open Space</p> <p>6. Southern Port Access road</p> <p><b>Note:</b> There is a detailed phasing objective for the delivery of this Action Area set out in Chapter 11.</p>

	Area/Zone	Key Infrastructure to be delivered prior to the delivery of development
PHASE TWO	Action Area 3	<p>1. Wastewater treatment plant</p> <p><i>Action Area 3 Phasing - The development shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure to serve the action area and local shops &amp; services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space and strategic road infrastructure shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).</i></p> <p>2. School site (in consultation with Dept of Education)</p> <p>3. Internal road layout has to be developed prior to the housing development <u>or</u> no more than 50% of the residential development may be constructed prior to the provision of the road infrastructure.</p> <p>4. Active Open Space has to be developed prior to the housing development <u>or</u> no more than 75% of the residential development may be constructed prior to the provision of the open space</p> <p>5. Avoca River Bridge has to be developed prior to the housing development <u>or</u> no more than 75% of the residential development may be constructed prior to the provision of this road infrastructure.</p> <p><b>Note:</b> There is a detailed phasing objective for the delivery of this Action Area set out in Chapter 11.</p>
	Action Area 4	<p>1. Wastewater treatment plant</p>

#### IMPLEMENTATION, MONITORING & REVIEW

Wicklow County Council is committed to taking a pro-active approach to progress the delivery of the Plan. The LAP will have effect for a period of six-years from the date of adoption, unless otherwise extended, amended or revoked, as per the Planning and Development Act 2000 (as amended). Prior to the fifth year from adoption, the Planning Department will carry out a review of the LAP to inform whether the Plan should be extended (for a maximum of another five years) or revoked. The findings of the review will be presented to the Elected Members for their consideration.

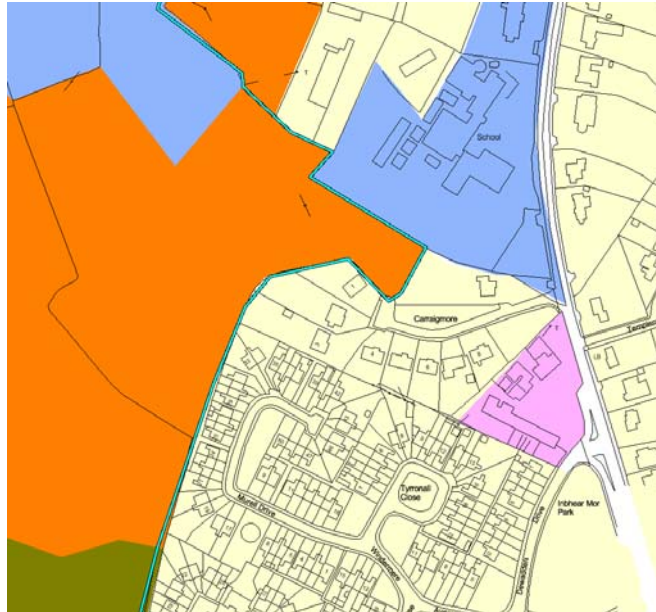


**Recommendation No. 10**

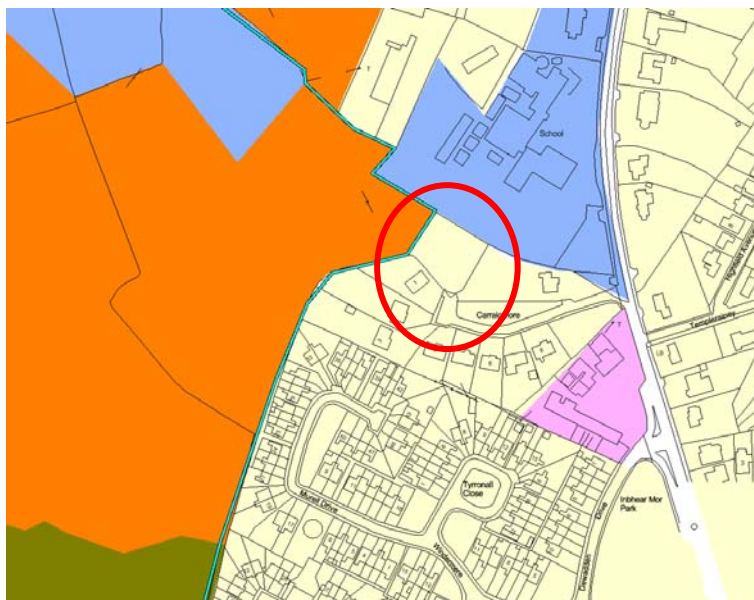
Amend map as follows:

**Land Use Zoning Map**

Change the zoning and Action Area Plan boundary and any other changes consequent from:



Change to:



**Recommendation No. 11**

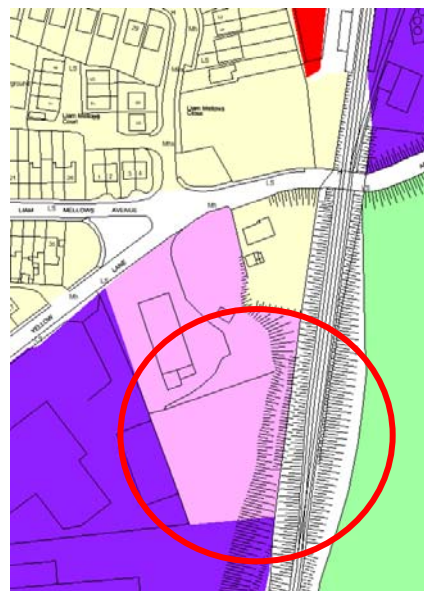
Amend map as follows:

**Land Use Map**

Change from E1 to LSS



Change to:





**Recommendation No. 12**

Amend map as follows:

**Land Use Map**

Change from OS2 to RE



Change to:



## PART III: SUMMARY OF ISSUES RAISED AND CHIEF EXECUTIVE'S OPINION AND RECOMMENDATION ON THESE ISSUES

### Section 3.1

### GROUP A - PRESCRIBED BODIES

Submission Number	A1	Prescribed Body	Department of Housing, Planning and Local Government
<b>Summary of Issues Raised</b>			
<p><b>(a)</b> The Department of Housing, Planning and Local Government considers that the Draft Arklow and Environs Local Area Plan 2017 provides a comprehensive framework for the future growth of the town in housing, employment and community terms. However, the Council is advised that there are significant aspects of the Draft Local Area Plan (LAP) that require specific actions to be undertaken in order to meet statutory and legislative obligations.</p>			
<p><b>(b) Housing Allocation and Core Strategy</b></p> <p>Arklow is designated as a 'Large Growth Town II' under the Wicklow County Development Plan (CDP) 2016-2022 with projected future potential growth to c. 23,000 population by 2028 in the long term. The future housing growth proposed for Arklow is detailed in chapter 2.1 of the Draft LAP and notes that a population target of 19,494 persons for 2022 (Table 2.2) per the Wicklow CDP. However, the Draft LAP is intended to govern the development of the settlement for the 2017-2023 period and the plan states that there are zoned lands for 5,726 housing units in the Draft LAP – a figure which relates to the period to 2028. The Draft LAP would therefore appear to provide for excessive residential zoning that does not correlate to the requirement for the six-year LAP plan period.</p> <p>The Council is requested to revise the housing allocation and associated residential zoning of the Draft LAP in order to ensure sufficient residential zoning is provided for the 2017-2023 period only.</p> <p>While subsequent chapters and sections of the Draft LAP refer to requirements for masterplans and phases of development, the LAP needs to have a clear overall housing unit target with identified zoned lands accordingly. Specifically, the Council is requested to provide a revised Table 2.2 that includes:</p> <ul style="list-style-type: none"> <li>● A current baseline population figure for Arklow incorporating additional released data from the CSO on Census 2016</li> <li>● A housing unit target for the plan period (i.e. to 2023)</li> <li>● An additional table should be provided indicating the name, size and yield of the zoned lands for housing in the LAP with an accompanying map to identify the geographical location of the subject lands. Lands intended for development beyond the statutory plan period should be appropriately designated as a strategic land bank and not zoned for development in the current plan.</li> <li>● Additional text and policy changes may be necessary elsewhere within the draft plan in association with the above changes.</li> </ul>			
<p><b>(c) Infrastructure and Development Phasing</b></p> <p>Substantial new residential, employment and other development is planned for in the Draft LAP for the future development of the settlement and Chapter 9 correctly states that '<i>adequate infrastructure is vital for the facilitation of future development of Arklow</i>'. In particular, the significant development planned will require to be serviced by the necessary supporting road and wastewater infrastructure to enable development to be properly accommodated.</p> <p>In this context, it is noted that there is no wastewater treatment plant in Arklow to serve the planned development envisaged in the draft LAP. The text of the LAP notes that Irish Water is preparing a project for planning approval for a new wastewater treatment plant for the town. The LAP however does not provide any further analysis of the likely timescale or nature of this project/scheme or commentary on the planned/required wastewater network infrastructure to serve the substantial new development areas dispersed</p>			

around the town. There is significant housing development proposed in the LAP and it is necessary for the availability of waste water services to inform the zoning of lands for housing which are intended to be developed over the plan period. In particular, the spatial phasing of new housing lands and how they are proposed to be serviced by the provision of wastewater infrastructure.

The substantial new residential and employment zonings also require investment in significant new distributor road infrastructure including a new bridge crossing of the River Avoca (to provide access to planned development areas at Kilbride and Coolboy) and the provision of a new Port Access Route along the southern eastern periphery of the town in order to remove port traffic from the main street and facilitate new development at Tinahask. These are significant new infrastructural proposals that do not appear to have been integrated into a clear overall phasing strategy for new development. Instead there is a piecemeal approach to the delivery of identified strategic road infrastructure. There is a substantial cost associated with these infrastructural items and the LAP needs to be informed by an analysis of the cost and prospects for the delivery of this infrastructure.

The LAP overall does not provide for comprehensive phasing programme for the delivery of the significant supporting infrastructure required to support the substantial housing and employment development proposed. Such an approach is contrary to the Local Area Plans Guidelines (2013) which emphasizes the critical need to identify delivery and funding mechanisms where significant new development is proposed in an LAP.

- The Council is therefore requested to provide an Implementation and Infrastructure Delivery Schedule in the Draft LAP (per chapter 6 of the Local Area Plan Guidelines 2013) which ensures that proposed development in Arklow is clearly phased on the basis of the timely delivery of identified new strategic infrastructure for the overall town including in particular road and wastewater facilities.

#### **(d) Residential Development Areas**

The substantial new residential development earmarked for the town are to be accommodated in four development areas identified on the on Map 1 'Land Use Zoning Objectives' as Action Areas (AAs). AA1 - Tinahask Upper (Abbeylands) and AA2 - Tinahask Upper (Money Little & Money Big) are located on the south eastern side of the town while AA3 - Kilbride and AA4 - Coolboy are located on the northern fringe of the settlement, north of the Avoca River. The strategy for the development of these areas is set out in Chapter 11 – with individual guidance for each area provided including estimated overall housing numbers, requirements for schools, open spaces, etc.

- As per the comments above, the overall housing units/zoning for the settlement needs to be revised to comply with core strategy requirements to 2023. The Council is requested to re-examine the proposed development areas and phase development in accordance with core strategy requirements, planned future infrastructural provision and the sequential spatial development of the town.

#### **(e) Residential Density Maximums**

Chapter 11 sets out the zoning objectives for the Draft LAP and this includes several residential zonings (R10, R20, R28, etc). Some of these specify a maximum density of housing permitted within the zoning. Such maximum densities provisions are not considered appropriate as the permitted format of new housing development is adequately dealt with through the development management process where the range of design and development considerations are assessed by the planning authority.

- Accordingly, the Council is requested to remove these maximum density requirements.

#### **(f) Strategic Employment Zoning**

The Draft LAP includes the zoning of c.49 ha of employment lands at Money Big/Bogland to the south of the town, east of the R772. It is stated on pg.20 that this is an 'Employment Opportunity Site' and has been zoned as 'E – *Special Employment*' on Map 1 'Land Use Zoning Objectives'. The area is considered to be a strategic location for large-scale employment formats with extensive land requirements. This approach is considered to be appropriate and will allow a potential new large FDI project to be facilitated.

- However, the indicated lands at Money Big/Bogland have infrastructural constraints currently and it is important the lands are not developed on a piecemeal basis and that their strategic function for large scale

employment development is safeguarded. While it is noted that guidance for the development of these lands is provided on pg.24, it is considered that the Council should include additional policy safeguards in the form of a specific employment objective(s) on pg.23 to ensure that the lands are reserved for major employment proposals requiring a significant site area only and that incremental, speculative small-scale development is excluded. A similar specific objective may be appropriate for the development of the former Shelton Abbey site in order to ensure that comprehensive new development is accommodated.

**(g)** The Council is requested to address the specific issues highlighted above in the Material Alterations stage of the statutory LAP process in order to ensure that the Arklow and Environs LAP 2017 is in compliance with legislative and statutory planning policy requirements.

The planning authority is reminded to have regard to any observations made by the Office of Public Works, Department of Culture, Heritage and the Gaeltacht, National Parks & Wildlife Service, Environmental Protection Agency and Irish Water. In this regard, Wicklow County Council must satisfy itself that it has met the relevant requirements as appropriate, and that the Draft Arklow and Environs Local Area Plan 2017 is fully compliant with its obligations under planning legislation.

### Opinion of Chief Executive

**(a)** Noted.

**(b)** The Department appears to be suggesting that the zoning provisions should be strictly for a 6 year timeline only and provide for no 'headroom' i.e. the zoning of additional land over and above the minimum amount needed to meet the 6 year housing target to allow for any land inflexibility that may arise – landowners not bringing land to the market, lands not achieving the densities outlined in the plan etc.

While current guidelines from the Minister on LAPs say very little about how the 'correct' amount of zoned land should be calculated, the Ministerial guidelines on 'development plans' published in 2007 (which have not been rescinded or superseded) state:

*"4.14 Planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect".*

It has been normal, long standing practice, endorsed and supported by the Department that local plans include zoning 'headroom', and it is not clear therefore the department fully appreciates the consequences of what it is requesting, which is a significant reduction in the amount of zoned land, at a time when there is a severe housing shortage in the country and county. In this regard, direct contact was made with the Department who clarified that headroom should be applied. It is therefore the CE's recommendation that the members contribute to make provision for zoning 'headroom'.

This LAP is likely to be adopted in 2018. The plan will have a 6 year time frame up to 2024. In accordance with the above quoted Ministerial guidelines, plans should include zoning 'headroom' in the order of 3 additional years' worth of zoning i.e. the quantum of zoning should align with the 2027 housing target.

After the issuing of these guidelines, the Planning Act was amended to make provision for extension of the lifetime of LAPs up to 10 years from adoption (which in this case would be 2028). It is therefore most logical to provide for a plan framework that accommodates the 2028 population and housing targets.

As set out in both this LAP and the County Development Plan, housing delivery will be managed to ensure

that population and housing targets for 2022, 2025 and 2028 will not be breached.

Further to this, the CDP 2016 and the draft LAP clearly set out a phasing plan to ensure that the lands are developed in LAP's in accordance with proper planning and the sequential approach.

Objective H4 of the draft LAP states "*The development of zoned land should generally be phased in accordance with the sequential approach as set out in the County Development Plan. The Council reserves the right to refuse permission for any development that is not consistent with these principles.*"

Chapter 11 includes the following Phasing provisions: *It is an objective of the Council that development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach:*

- *Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided;*
- *A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- *Areas to be developed should be contiguous to existing developed areas.*

*Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.*

*The Council may, in certain cases, phase permitted development where this is considered necessary for the following:*

- (i) *the promotion of an appropriate balance of employment, residential and service facilities (schools, shopping, community facilities etc.) and other uses that are required to increase the self sufficiency of the settlement, or*
- (ii) *ensuring the delivery of infrastructural services in tandem with development, including water, sewerage and road infrastructure, that is required to safeguard the environmental quality and public safety of the area.*

Therefore no change is recommended here.

It is acknowledged that since the publication of the draft LAP, the CSO have released their SAPS data for the 2016 census.

### **Arklow Population profile**

The CSO provides the result of each census in a number of different geographical units including 'electoral divisions', 'legal towns', 'census towns' and 'small areas'.

Arklow Town (Census Town)

	<b>2006</b>	<b>2011</b>	<b>2016*</b>
<b>Arklow (legal town)</b>	11,712	12,770	-
<b>Arklow (census town<sup>5</sup>)</b>	11,759	13,009	13,163

With regard to the 2016 figure, the CSO states the following: '*80 legal towns were abolished under the Local Government Reform Act 2014. Census towns which previously combined legal towns and their environs have been newly defined using the standard census town criteria (with the 100 metres proximity rule). For some towns the impact of this has been to lose area and population, compared with previous computations*'.

### **Arklow EDs (within or crossing plan boundary)**

	<b>2006</b>	<b>2011</b>	<b>2016</b>
<b>Arklow No. 1 Urban</b>	9128	9817	9956
<b>Arklow No. 2 Urban</b>	2584	2953	3013
<b>Arklow Rural</b>	1067	1301	1386

<sup>5</sup> Population within legally defined boundary + population of (CSO defined) suburbs or environs

<b>Kilbride</b>	825	909	892
	<b>13,604</b>	<b>14,980</b>	<b>15,247</b>

Arklow SAPs (within or crossing plan boundary)

	<b>Small Area ID</b>	<b>2006</b>	<b>2011</b>	<b>2016</b>
<b>Arklow No. 1 Urban</b>	257004001	303	366	342
	257004002	369	401	415
	257004003	366	354	352
	257004004	250	316	327
	257004005	263	331	377
	257004006	258	240	263
	257004007	242	248	256
	257004008	198	150	164
	257004009	263	267	273
	257004010	219	187	178
	257004011	153	200	209
	257004012	269	260	275
	257004013	341	285	297
	257004014	275	278	271
	257004015	283	300	286
	257004016	309	306	318
	257004017	236	221	243
	257004018	2	380	402
	257004019	0	274	367
	257004020	259	225	206
	257004021	244	227	209
	257004022	286	215	224
	257004023	228	260	285
	257004024	312	336	337
	257004025	298	291	277
	257004026	188	196	198
	257004027	289	283	249
	257004028	369	392	391
	257004029	209	204	183
	257004030	402	347	335
	257004031	203	209	205
	257004032	183	179	178
	257004033	177	192	188
	257004034	189	216	241
	257004035	193	205	192
	257004036	145	131	118
	257004037	188	177	180
	257004038	167	168	165
<b>Arklow No. 2 Urban</b>	257079001	150	256	282
	257079002	412	366	368
	257079003	212	249	267
	257079004	67	209	242
	257079005	199	207	204
	257079006	165	244	242



	257079007	332	345	359
	257079008	237	244	229
	257079009	187	213	202
	257079010	289	289	290
	257079011	334	331	328
<b>Arklow Rural</b>	257003002	283	321	349
	257003004	128	146	141
	257003005	214	297	332
<b>Kilbride</b>	257047001	330	405	388
	257047002	297	284	284
<b>Total</b>		<b>12,964</b>	<b>14,223</b>	<b>14,483</b>

Unfortunately none of these geographical units match the Local Area Plan boundary. In 2012-2013, a time consuming and detailed exercise was carried out by Wicklow County Council to determine the actual 2011 population and housing stock within the then plan boundary. Unfortunately due the gradual release of necessary data (some of which was only released in July 2017) and the lack of resources and capacity to conduct the same exercise for 2016, it was not completed by the time the draft plan was published.

Having now completed this exercise, it is estimated that the housing stock and population for 2016 within the LAP area is:

**Housing stock – 5396**

**Population – 13,313**

On the basis of the housing stock and population growth targets for Arklow set out in the County Development Plan Core Strategy, there will be a housing stock growth of 4442 units required between 2016 and 2025, and including 3 years headroom, the plan should make zoning provision for 5,789 units.

The draft plan as published made zoning provision for housing stock growth of 5,726 units. Therefore using the updated figures, there is a slight shortfall of 63 units or 1%. It is not recommended that any zoning amendments are made to the plan on foot of this revised target given the minor scope of the shortfall.

It is recommended that the plan be amended to include the 2016 Census data as set out above.

**(c)** Irish Water are responsible for the provision of the Waste Water Treatment Plant in Arklow, which will be the subject of a SID application to An Bord Pleanála, therefore no specific timeframe can be provided for the delivery of the plant. In order to deal with this lack of waste water treatment infrastructure, it is clearly set out in the CDP *'In order to fulfil the objectives of the Core Strategy, Wicklow County Council will work alongside and facilitate the delivery of Irish Water's Water Services Investment Programme, to ensure that all lands zoned for development are serviced by an adequate wastewater collection and treatment system and in particular, to endeavour to secure the delivery of regional and strategic wastewater schemes. In particular, to support and facilitate the development of a WWTP in Arklow, at an optimal location following detailed technical and environmental assessment and public consultation'* (Objective WI6).

The CE is surprised that the Department has suggested that the members should allow the availability of water services to guide them as to the most appropriate land to zone for new development. Irish Water is a utility provider, not a strategic development agency or land-use framework crafting entity. Where land has been designated for development following sound planning principles (including the ability to be serviced by future water services infrastructure) and in accordance with Ministerial Guidelines, it is the role of IW to deliver the

services to said development.

- (i) The bridge over the Avoca is a long term objective, for which at this time there is no funding stream; it is considered unlikely that it would be delivered in the lifetime of this plan. The purpose of this objective is to ensure that the development of lands north and south of most likely bridge location, if developed, are developed in such a way as to facilitate the construction of the bridge. In particular, the developer of the Kilbride lands will be required to provide the road network (or reserve the land) that would connect the bridge to the Kilbride Road.

The first 75% of the development of zoned lands in Kilbride or elsewhere in the settlement is not contingent on the delivery of this bridge and therefore it is not considered necessary to outline a schedule or phasing of development on the basis of the delivery of this bridge.

- (ii) The delivery of the Southern Port Access Road, from the railway crossing to the port is a requirement of any development in Action Area 2. Action Area 1 is also dependent on the construction of the initial part of this route.

It is recommended that the plan include an 'Implementation & Infrastructure Delivery Schedule' alongside a more detailed phasing timeframe as set out to follow.

**(d)** The development of these Action Areas are reliant on the Action Area being agreed prior to any planning application being submitted. As part of the Action Area agreement a phasing plan is required with details on how the lands are to be developed in line with the sequential approach as outlined in the CDP 2016. It is not considered necessary to revise the housing numbers allocated as it is considered that the development of the Action Areas will be managed in line with proper planning through the Development Management process.

**(e)** It is not recommended to remove the maximum density requirements within the draft LAP. As stated in the CDP 2016 *"It is an objective of the Council to encourage higher residential densities at suitable locations, particularly close to existing or proposed major public transport corridors and nodes, and in proximity to major centres of activity such as town and neighbourhood centres."*

**Maximum densities will normally be ascribed to each parcel of zoned / designated residential land in the relevant local plan. Densities are crafted following an assessment of the capacity and characteristics of the land in question, in the interests of providing the most compact and sustainable form of development. In order to achieve the housing growth targets set out in the Core Strategy, it is important that maximum densities are achieved, except where insurmountable impediments arise."**

Objective HD5 states *"In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands<sup>6</sup>. The Council reserves the right to refuse permission for any development that is not consistent with this principle."*

Further to this the Local Area Plan Guidelines seek a "minimum density of 35 – 50 dwellings per hectare in urban areas of suitable size and population where local circumstances warrant, particularly in high-capacity public transport corridors". Albeit these lands are alongside the Dublin-Rosslare rail line, it is not a high-capacity public transport corridor, the proposed density of 28 units per hectare is considered appropriate and in fact quite dense given the growth designation of Arklow, the location of these lands within the settlement and the existing residential character of Arklow.

**(f)** Noted. It is not considered necessary to include an additional objective to safeguard the development of these lands for a major employment proposal, not facilitating speculative small scale development. The objective for the development of these lands clearly state *"To resist the development of a business/office park type development on these 'E Special' employment zoned lands"*. The lands are zoned E-Special with the clear objective to *"To provide for a large, single, undivided employment development."* With the objective description

<sup>6</sup> Unless specific in the relevant local plan, the density objective for any particular lands shall be drawn for the principles set out in the Development and Design Standards appended to the CDP



"To facilitate the development of a particular type of employment provision, that is, to provide for large, single, undivided employment development, such as 'direct foreign investment' businesses and would be likely to appeal to multinationals or significant IT (such a data centres) / green technology / pharmaceutical industries." It is considered that the zoning and objectives for these lands will safeguard the lands from inappropriate employment development. No change is recommended.

With regard to the Employment lands at Shelton Abbey (former IFI), the concerns of the Minister are acknowledged however given that this site is a brownfield site with an active employment use on the site (Avoca River Business Park Ltd.) adding any additional safeguards/restrictions may hinder the existing active use on the site. No change is recommended.

(g) Noted. The submissions from the EPA (A5) and IW (A6) are death with below. No submission was received from the Office of Public Works, Department of Culture, Heritage and the Gaeltacht or National Parks & Wildlife Service.

It is recommended to include the following:

1. Insert the following text and any changes consequent

## Chapter 2

### Population and Housing

#### Section 2.1 – Population & Housing

##### Population & Housing Profile

The CSO provides the result of each census in a number of different geographical units including 'electoral divisions', 'legal towns', 'census towns' and 'small areas'.

##### Arklow Town (Census Town)

	2006	2011	2016*
Arklow (legal town)	11,712	12,770	-
Arklow (census town <sup>7</sup> )	11,759	13,009	13,163

\* With regard to the 2016 figure, the CSO states the following: '80 legal towns were abolished under the Local Government Reform Act 2014. Census towns which previously combined legal towns and their environs have been newly defined using the standard census town criteria (with the 100 metres proximity rule). For some towns the impact of this has been to lose area and population, compared with previous computations'.

##### Arklow EDs (within or crossing plan boundary)

	2006	2011	2016
Arklow No. 1 Urban	9128	9817	9956
Arklow No. 2 Urban	2584	2953	3013
Arklow Rural	1067	1301	1386
Kilbride	825	909	892
	<b>13,604</b>	<b>14,980</b>	<b>15,247</b>

##### Arklow SAPS<sup>8</sup> (within or crossing plan boundary)

Small Area ID	2006	2011	2016
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<sup>7</sup> Population within legally defined boundary + population of (CSO defined) suburbs or environs

<sup>8</sup> Small Area Population Statistics

<b>Arklow No. 1 Urban</b>	257004001, 257004002, 257004003, 257004004, 257004005, 257004006, 257004007, 257004008, 257004009, 257004010, 257004011, 257004012, 257004013, 257004014, 257004015, 257004016, 257004017, 257004018, 257004019, 257004020, 257004021, 257004022, 257004023, 257004024, 257004025, 257004026, 257004027, 257004028, 257004029, 257004030, 257004031, 257004032, 257004033, 257004034, 257004035, 257004036, 257004037, 257004038	<b>9128</b>	<b>9817</b>	<b>9976</b>
<b>Arklow No. 2 Urban</b>	257079001, 257079002, 257079003, 257079004, 257079005, 257079006, 257079007, 257079008, 257079009, 257079010, 257079011	<b>2584</b>	<b>2953</b>	<b>3013</b>
<b>Arklow Rural</b>	257003002, 257003004, 257003005	<b>625</b>	<b>764</b>	<b>822</b>
<b>Kilbride</b>	257047001 & 257047002	<b>627</b>	<b>689</b>	<b>672</b>
<b>Total</b>		<b>12,964</b>	<b>14,223</b>	<b>14,483</b>

Unfortunately none of these geographical units match the Local Area Plan boundary. However, using the CSO data, cross referenced with GeoDirectory data, the estimates of 2016 population and housing stock with the plan area are as follows:

	EXISTING POPULATION	EXISTING HOUSING STOCK
2016	13,313	5,396

Table 2.2 Arklow population and housing stock 2016 (Source: WCC Forward Planning)

### Population & Housing Targets

The 2022, 2025 and 2028 population and housing targets for Arklow are provided in the Core Strategy of the County Development Plan.

While this plan will have a duration of 6 years initially (~~2017-2023~~), ~~2018-2024~~, the provisions of the Planning Act allow in certain circumstances for the duration of local area plans to be extended to 10 years i.e. up to ~~2027~~ 2028. In this context, it is considered appropriate at this stage that the plan shall put in place a structure to meet the 2025 population and housing target, with 3 years additional zoning 'headroom' to ensure that there will be no lack of zoned housing land (i.e. the 2028 target will be utilised). "Headroom" or "market factor" is 'extra' land that is zoned over and above the minimum amount needed to accommodate the 2025 population target. Headroom is provided so as to allow for greater location choice and deal with any land supply inflexibility which may arise.

~~The 2011 population and housing unit figures used in the 2016 County Development Plan are derived from the 2011 Census, as the full results of the 2016 Census were not available at the time of the making of the County Development Plan, and similarly were not available at the time of production of this draft plan. As the Census 'town boundaries' do not always necessarily match Wicklow County Council's plan boundaries, the Census figures have been amended where required, using additional data sources such as the CSO 'Small Area Population Statistics' and the An Post GeoDirectory.~~ The housing stock requirement is based on these population targets, a projected decreasing number of occupants of each house and built in assumptions about the level of vacancy / second homes<sup>9</sup>.

	EXISTING POPULATION / POPULATION TARGET	EXISTING HOUSING STOCK / HOUSING STOCK REQUIREMENT	HOUSING UNIT GROWTH REQUIREMENT
2011	13,066	5,459	
2022	19,494	7,509	+2,050

<sup>9</sup> For more information, see Wicklow County Development Plan, Core Strategy

2025	21,247	9,838	+4,379
2028	23,000		+5,726

Table 2.2 Arklow population and housing targets (Wicklow County Development Plan 2016)

	EXISTING POPULATION / POPULATION TARGET	EXISTING HOUSING STOCK / HOUSING STOCK REQUIREMENT	HOUSING UNIT GROWTH REQUIREMENT
2016	13,313	5,396	
2022	19,494	7,509	+2,113
2025	21,247	9,838	+4,442
2028	23,000	11,185	+5,789

Table 2.3 Arklow population and housing targets

This LAP provides adequate zoned land to ~~yield a potential additional housing supply of c. 5,726 units~~ meet this housing target.

2. Insert the following

#### APPENDIX D

#### PHASING AND IMPLEMENTATION

##### INTRODUCTION

This appendix of the Local Area Plan deals with the infrastructure delivery schedule and sequential development phasing programme linked with necessary investment in infrastructure. The sequential development of the settlement, alongside the phased delivery of the necessary infrastructure including open space, waste water, drainage, educational and recreational amenities and local service provision, is key to the sustainable development of Arklow. It is critical that the Local Area Plan ensures that development within the Local Area Plan lands progresses in an ordered way which avoids 'leapfrogging' to peripheral areas that are geographically isolated from the existing settlement and infrastructural provision.

In order to ensure the successful delivery of the objectives of this plan, Wicklow County Council takes a positive proactive approach in active plan management in order to expedite the delivery of new homes as part of the new residential neighbourhoods planned within the Local Area Plan. Wicklow County Council liaises with all relevant authorities in a collaborative process to resolve any potential blockages to deliver residential development. Further to this any sites in Arklow in need of development or renewal within the Town Centre (TC), Waterfront (WZ) and Residential zones will be examined in order to determine if there are sites where the Vacant Site Levy should be applied.

##### INFRASTRUCTURE DELIVERY SCHEDULE

This section sets out the key infrastructure necessary, in a staged delivery schedule, in order to achieve the phased delivery of the objectives of this plan. This section focuses on the key road, recreational, community and educational infrastructure. It is acknowledged that there is a broad range of infrastructure necessary in order to enhance the services to the homes, businesses and schools of Arklow. The development and continued delivery of telecommunications, energy and Arklow Port is addressed under the County Development Plan and Wicklow County Council continues to liaise and work with the necessary telecommunications and energy providers of such infrastructure to continue to enhance these services. Arklow Port is a function of Wicklow County Council.

The lifetime of the Local Area Plan is six years. The delivery schedule is divided in to the following four phases as well as an on-going stage with delivery throughout the plan lifetime and beyond:

<u>Immediate term</u>	Year 1 and Year 2
<u>Short term</u>	Year 3 to Year 5
<u>Medium term</u>	Year 5 to Year 10
<u>Long term</u>	10 years plus
<u>On - going</u>	Through-out the plan lifetime and beyond

There are a number of stakeholders involved in the delivery of all the infrastructure projects. All projects are dependent on funding. There are also numerous other matters that need to fall in line in order for each infrastructure project to be delivered, like land acquisition, securing the appropriate planning approval, sourcing the funding, etc. One significant obstacle in the delivery of any new development in Arklow in the short term is the lack of a waste water treatment plant. New development is not encouraged in the absence of such a key piece of infrastructure; however once Irish Water has secured the appropriate permission for the plant, new development may be permissible with an occupancy holding condition until the plant is in operation. The resolution of waste water issues, in effect, removes the most fundamental blockage to commencing development, therefore following this resolution, the focus will be the establishment of sustainable and smarter travel patterns, including the delivery of new / upgrading of existing roads.

More local level infrastructure is to be provided within the key development parcels including school and crèche provision, neighbourhood centre facilities, pocket parks, cycle and pedestrian routes, civic spaces and public realm improvements. Wicklow County Council will work particularly with the Department of Education and Skills (DoEd) and individual developers to secure the co-ordinated delivery of essential school provision.

The LAP identifies a range of strategic and local infrastructure necessary to facilitate development in the Plan Area. The timely and co-ordinated delivery of such infrastructure across a number of state agencies will be a key focus of Wicklow County Council.

The key funding sources for the delivery of infrastructure are:

<u>Developer</u>	The developer of the land / infrastructure provides the funding to deliver the infrastructure or provides the infrastructure themselves.
<u>State</u>	LIHAF funding, Smarter Travel funding, Irish Water (IW), Transport Infrastructure Ireland (TII), National Transport Authority (NTA), OPW, Department of Education, LEADER/SICAP funding, other government departments, etc
<u>Wicklow County Council</u>	WCC Development contribution schemes, WCC Capital Works Programme, etc.

This schedule is a living programme. It will be reviewed at regular intervals to assess how the implementation is progressing, available resources and as new sources of funding and/or providers emerge.

Implementation & Infrastructure Delivery Schedule Table

<b>Infrastructure</b>	<b>Delivery Schedule</b>	<b>Funding</b>
<b>Transport</b>		
Southern Port Access Road	Medium term	Developer, State, WCC
Avoca River Bridge	Long term	Developer, State
Leinster Outer Orbital Route	Long term	State

Western distributor route	Medium term	Developer, State, WCC
Third interchange at Lamberton	Long term	State
Upgrading of bridge over railway line from Knockmore to Tinahask	Short term	Developer, State
Distributor road access between AA1 to AA2	Short term	Developer, State
General Road Improvements	On-going	Developer, State, WCC
General Footpath Improvements	On-going	Developer, State, WCC
General Cycle Improvements	On-going	Developer, State, WCC
General Car parking Improvements	On-going	Developer, State, WCC
<b>Sanitary Services</b>		
Wastewater Treatment Plant	Short term	State (IW)
Replace the combined surface water system with a separate network to the waste water	On-going	State (IW), WCC
Avoca River Flood Defence Scheme	Immediate - Short term	State (OPW), WCC
<b>Social Infrastructure</b>		
AOS at Churchview including e.g. MUGA	Medium term	Levies / Developer
AOS at AA1 Tinahask	Short term	Developer
AOS at AA2 Tinahask	Medium term	Developer
AOS at AA3 Kilbride	Medium term	Developer
AOS at AA4 Coolboy	Long term	Developer
Creche/ Childcare facilities	Short - Medium term	Developer
Community facilities (Audit required <sup>10</sup> )	Short - Medium term	Developer
School site in Kilbride	Immediate term	State (DoEd)
Future 2 Primary School sites and 1 Post Primary School site at AA1 & AA2 Tinahask Upper/ Money Big	Medium term	State (DoEd)
Graveyard	Immediate term	Developer / WCC

## PHASING

Accordingly, as set out in Chapter 11, the phasing of development will be linked with the overall development strategy for the Local Area Plan whereby the existing settlement will expand geographically from the centre, through the development of physically adjoining lands in a coherent manner. New development will integrate with the established settlement of Arklow and will be supported by the required infrastructure provision.

In order to fulfil the core strategy and the population and housing objectives of the Local Area Plan, the plan requires the key new residential areas of the town centre, waterfront, and 4 Action Area's to be developed as part of the future growth of Arklow.

<sup>10</sup> Where specified by the Planning Authority, new significant residential or mixed use development (This is determined to be any proposed development in: (a) settlement levels 1 to 4 of 150+ residential units, (b) settlement level 5 of 75+ residential units and (c) settlement level 6 of 30+ residential units.) proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

Phasing Schedule Table

	Area/Zone	Key Infrastructure to be delivered prior to the delivery of development
<b>PHASE ONE</b>	Town Centre (opportunity sites), Waterfront, Infill development,	2. Wastewater treatment plant.
	Action Area Plan 1	5. Wastewater treatment plant. <i>Action Area 1 Phasing - The development of the AAP shall be delivered in phases such that the road infrastructure and active open space is provided in the first phase accompanied by no more than 50% of the residential development.</i> 6. Distributor road access from AA2 7. School sites (in consultation with Dept of Education.) Note - the optimal location for a future school has been identified, and zoned CE and the lands reserved. 8. Active Open Space
	Action Area Plan 2	7. Wastewater treatment plant. <i>Action Area 2 Phasing - The development of the Action Area shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure (providing access to the AA1 lands to the north) and local shops &amp; services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space, employment facilities and Southern Port Access link road shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).</i> 8. Upgrading of bridge over railway line from Knockrahen to Tinahask 9. Distributor road access to AA1 and to the south 10. School sites (in consultation with Dept of Education.) 11. Active Open Space 12. Southern Port Access road <b>Note:</b> There is a detailed phasing objective for the delivery of this Action Area set out in Chapter 11.
	Area/Zone	Key Infrastructure to be delivered prior to the delivery of development

<b>PHASE TWO</b>	Action Plan 3	Area	<p>6. Wastewater treatment plant</p> <p><i>Action Area 3 Phasing - The development shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure to serve the action area and local shops &amp; services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space and strategic road infrastructure shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).</i></p> <p>7. School site (in consultation with Dept of Education)</p> <p>8. Internal road layout has to be developed prior to the housing development <u>or</u> no more than 50% of the residential development may be constructed prior to the provision of the road infrastructure.</p> <p>9. Active Open Space has to be developed prior to the housing development <u>or</u> no more than 75% of the residential development may be constructed prior to the provision of the open space</p> <p>10. Avoca River Bridge has to be developed prior to the housing development <u>or</u> no more than 75% of the residential development may be constructed prior to the provision of this road infrastructure.</p> <p><b>Note:</b> There is a detailed phasing objective for the delivery of this Action Area set out in Chapter 11.</p>
	Action Plan 4	Area	2. Wastewater treatment plant

**IMPLEMENTATION, MONITORING & REVIEW**

Wicklow County Council is committed to taking a pro-active approach to progress the delivery of the Plan. The LAP will have effect for a period of six-years from the date of adoption, unless otherwise extended, amended or revoked, as per the Planning and Development Act 2000 (as amended). Prior to the fifth year from adoption, the Planning Department will carry out a review of the LAP to inform whether the Plan should be extended (for a maximum of another five years) or revoked. The findings of the review will be presented to the Elected Members for their consideration.

Submission Number	A2	Prescribed Body	National Transport Authority (NTA)
<b>Summary of Issues Raised</b>			
<b>(a) Arklow Town Centre</b>			
<p>The NTA supports the promotion of the town centre as the focus of the settlement in terms of economic activity. It is therefore of critical importance that access by all modes of transport to the centre is maximised and, in particular, that the environment for walking, cycling and public transport is improved.</p> <p>As such, and in the context of proposals to significantly expand the orbital road network in Arklow, Objective VP1, which seeks to <i>"maintain the Main Street as the principal vehicular route through the town centre"</i> does not fully align with the principles of the 'Greater Dublin Area Transport Strategy 2016 – 2035' (the "Transport Strategy"), in particular section 5.8.2 which states that it is intended to <i>"develop orbital roads around town centres accompanied by and facilitating enhanced public transport, cycling and pedestrian facilities in the relevant centre"</i>. While some measures are stated, it is considered that the Town Centre section of the draft plan does not adequately seek improvements to walking and cycling in the town centre.</p> <p>There appears to be the opportunity to develop an overall street enhancement scheme for Main Street which would provide widened footpaths, better crossing facilities, high quality surfacing, and other public realm improvements. This may need to be accompanied by additional speed restrictions for vehicular traffic.</p>			

*Recommendation*

- The NTA recommends that Objective VP1 is removed from the Local Area Plan and replaced with an objective which acknowledges the function of Main Street as a traffic route, but proposes an overall street enhancement scheme to improve the street environment for other users, and which may include widened footpaths, cycle facilities (where feasible), public realm improvements, and possibly accompanied by reduced speed limits.

**(b) Arklow Waterfront**

The NTA fully support the proposals which seek to regenerate Arklow's waterfront. It is essential that the redevelopment of this area is fully integrated into the town centre. It may also be desirable that both sides of the River Avoca are connected at this point.

*Recommendation*

- The NTA recommends that an additional objective is inserted into the plan which states that new opportunities for pedestrian and cycle links from the Waterfront to the town centre will be pursued by the local authority as the area develops.
- It is also recommended that consideration is given to including an objective which states that the feasibility of connecting each side of the Waterfront zone is investigated in conjunction with the NTA.

**(c) Transport**

The NTA has reviewed the transport elements of Chapter 9 of the draft plan and requests that the following recommendations are incorporated into the plan in order that it aligns with the Transport Strategy.

*Recommendations*

- An objective should be included which reflects a commitment to the implementation of the GDA Cycle Network Plan;
- An objective should be included which states that all new residential areas will be designed to be fully permeable for walking and cycling;
- In order to overcome the legacy issues of a disconnected pattern of residential development, an objective to retro-fit walking and cycling links between existing residential areas, and between existing and new residential areas, is required;
- Objective IT6 should be removed as the proposed interchange would facilitate the use of the M11/N11 by local traffic and as such would not be consistent with its strategic function as an interurban route;
- An objective is required which states that all road development will be undertaken in a manner consistent with Section 5.8 of the Transport Strategy;
- Reference to the Leinster Outer Orbital Route should acknowledge that it does not form part of the Transport Strategy, which sets out the regional transport objectives to 2035.

**(d) Land Use Zoning**

The NTA notes the extent of land zoned for residential purposes – and the densities proposed for each site – and the extent of land zoned for employment use. The NTA also notes that the *Sustainable Residential Development in Urban Areas* Guidelines state that "*Development at net densities less than 30 dwellings per hectare should generally be discouraged in the interests of land efficiency, particularly on sites in excess of 0.5 hectares*". In addition, section 7.1.2 of the Transport Strategy seeks to prioritise residential development into locations well served by public transport in a sequential manner, and to protect the strategic transport function of national roads.

According to the draft plan, there are significant constraints associated with the development of Coolboy (Action Area 4), meaning it is not feasible to provide for a gross density in excess of approximately 7 units per hectare with a net density of approximately 20 units per hectare. Given these density constraints and taking into account the site's location at a significant remove from the town, adjacent to the M11, thereby increasing the potential for car-based commuting, its development is not reflective of integrated transport and land use planning and would not align with the Transport Strategy. The maximum residential density proposed elsewhere in the draft plan is 28 units per hectare.



*Recommendation*

- It is recommended that the zoning for Action Area 4 and surrounding sites is removed and that the consequent shortfall in housing provision is compensated for by increasing the densities on the remaining zoned lands to a level more closely aligned with national and regional planning policy.
- Based on the same rationale, it is also recommended that the requirement for the lands zoned R20 to the south of Arklow are reviewed, with a view to their removal.

**(e)** In relation to employment development, the NTA emphasises the need to consolidate high-intensity employment such as offices into town centres and locations served by public transport, and on ensuring that the traffic impacts of all employment generating uses are fully assessed, in particular the impacts on the carrying capacity of the strategic road network.

*Recommendation*

- It is recommended that an objective is inserted into Chapter 4 which states that the development of employment generating uses will be carried out in a manner which takes full account of its impact on the N/M11 and seeks to fully mitigate any potential adverse effects, thereby protecting its strategic function.

**Opinion of Chief Executive**

**(a)** Given the lack of a through alternative route from north to south through the town, it is considered important to maintain objective VP1 in the LAP, until such time as there is an alternative route but it is recommended that the wording be slightly changed to recognise this: .

*"VP1 To maintain the Main Street in the short to medium term (until alternative orbital routes are developed) as the principal vehicular route through the town centre and to maintain the main vehicular routes to the waterfront area along the quays; to exploit any opportunities that arise to improve safety for both pedestrians and vehicles in the Town Centre and Waterfront area."*

In line with the NTA's 'Greater Dublin Area Transport Strategy 2016 – 2035', the LAP includes objectives to improve walking and cycling facilities in the town centre of Arklow. The draft LAP encourages and facilitates improvements for pedestrian and cycling with objectives VP1, VP2, VP11 and IT11 seeking to enhance pedestrian and cycling facilities in the town. To *"allow for the improvement or provision of new walking and cycling facilities throughout the County,"* is part of the transport strategy for the County under the CDP, with objectives TR9 to TR13 addressing cycling and walking enhancement throughout the county as well as Arklow. In light of the NTA's submission it is recommend to include an objective in the Arklow Town Centre Strategy *"To seek to prepare an overall Main Street enhancement scheme to improve the street environment for all users, which may include widened footpaths, cycle facilities (where feasible), public realm improvements, and possibly accompanied by reduced speed limits"*

**(b)** There are existing objectives that encourage and facilitate better linkages within the plan area; *" WZ9 To require any new developments to be suitably set back from the water's edge and to provide public routes and places along waterfronts; to support the development of a footbridge across the entrance to south dock"* and *"VP9 To support opportunities to create better linkages between the Main Street, the river, the north and south quay and the beaches, in particular access routes and views between the two."*

The concerns of the NTA are noted and it is recommend to include the following objectives in the Arklow Waterfront Strategy

- *To facilitate the development of new opportunities for pedestrian and cycle links from the Waterfront to the town centre.*
- *In conjunction with the NTA, to carry out a feasibility study to investigate the possibility of connecting each side of the Waterfront zone.*

**(c)** With regard to referencing the GDA's Cycle Network Plan, this is noted and it is recommended to include an objective.

- It is not considered necessary to include an objective which states that all new residential areas will be designed to be fully permeable for walking and cycling as the Development and Design Standards of the CDP

requires 'Connections' as a 'Key principle of good design' and Section 1 of the standards provide details on how "Accessibility" with permeability and legibility is to be incorporated in to new development proposals.

- It is not considered necessary to include an objective which seeks to retro-fit walking and cycling links between existing residential areas, and between existing and new residential areas, as objective TR9 of the CDP seeks to "To improve existing or provide new foot and cycleways on existing public roads, as funding allows"

- It is noted that the NTA does not support the inclusion of objective IT6. While it is accepted that this may not have funding or be a priority at present, the Arklow by-pass was designed to allow for the future connection and it would appear short sighted therefore to remove this objective. The maintenance of such objectives also ensures that any development proposals in the area of this possible interchange will be appropriately managed to ensure they would not impede its delivery. Therefore it is not recommended that this objective be omitted.

- It is not considered necessary to include an objective in this local area plan that all road development will be undertaken in a manner consistent with Section 5.8 of the Transport Strategy as a commitment to adhere to the strategy is already set out in the CDP.

- The Regional Planning Guidelines for the Greater Dublin Area identify a need for a 'Leinster Outer Orbital Route'. As the Regional Planning Guidelines is a higher order strategy for the development of the Region as a whole, the CDP and LAP have reiterated this objective. It is not considered necessary to incorporate in the reference to the Leinster Outer Orbital Route that it does not form part of the Transport Strategy, which sets out the regional transport objectives to 2035.

**(d)** It is considered appropriate to retain the zoning of the lands at Coolboy and the R20 zoned lands to the south. It is acknowledged that the lands in Coolboy have constraints, including the overhead powerlines, hence the need for set criteria for the development of the lands. Both of these area's are on the periphery of the plan boundary, on the rural fringe and in order to ensure an appropriate transition from the open countryside to the built up area, the lower density zonings are considered appropriate. It is important that a range of housing types and densities are provided for in the plan, in order to allow for consumer choice and market flexibility.

While the NTA's point is noted and it is generally agreed that requiring higher density makes better use of land, reduces sprawl and would potentially allow for more efficient delivery of services, it is considered that it is appropriate that the plan provides for an appropriate balance and range of density formats, with the vast majority of land zoned in this plan for at the higher end of the density scale given the character and market demands in a rural market town like Arklow, distant from the city.

**(e)** It is not considered necessary to inserted an objective seeking that the development of employment generating uses will be carried out in a manner which takes full account of its impact on the N/M11 and seeks to fully mitigate any potential adverse effects, thereby protecting its strategic function, as objectives EMP4, EMP5, TR15 and TR16 of the CDP address this issue appropriately.

*EMP4 "To permit proposals for employment generating development where it can be demonstrated that the development complies with the relevant development standards and is not detrimental to residential amenity or to environmental quality, and is acceptable with regard to its impact on the character and visual amenity of the area. Regard will be paid to ensuring that existing or planned infrastructure can acceptably accommodate a proposed development. Developments that result in an unacceptably high level of traffic generation, that are detrimental to residential amenity, the character or visual amenity of an area or the existing roads infrastructure will not be permitted."*

*EMP5 "To promote the development of employment generating uses at locations which comply with sustainable transportation objectives, i.e. • promoting the development of 'product' intensive industries (typically manufacturing and logistics based uses) at locations that are accessible to strategic roads infrastructure; • promoting the development of 'people' intensive industries (typically office, services and start-up entrepreneur*

based uses) at locations that are accessible by public transport networks and substantial residential areas, served by cycle networks and walking routes; • promoting the intensification of existing employment land uses that are in proximity to good public transport facilities; and • where appropriate, promoting the integration of employment uses with other land uses, including residential, tourism and retail uses, in an effort to provide mixed use developments, which can reduce the need to travel."

TR15 "Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Roads and Bridges' the 'Traffic & Transport Assessment Guidelines' (TII) and the Design Manual for Urban Roads and Streets (DoECLG & DoTTS)",

TR16 "Road Safety Audits and/or Road Safety Impact Assessments shall be required at the discretion of the Planning Authority, but shall generally be required where new road construction or a permanent change to the existing road layout is proposed" and objective TR21 "To safeguard the capacity and safety of the National Road network by restricting further access onto National Primary and National Secondary roads in line with the provisions of the 'Spatial Planning and National Roads' Guidelines' (DoECLG 2012)"

Indeed the provision of employment infrastructure will have a direct positive impact on Route N11/M11 by reducing the huge level of commuting northwards from the town.

### Chief Executive's Recommendation

1. To insert the following text:

#### Arklow Town Centre Strategy Objectives

**VP1** To maintain the Main Street in the short to medium term (until alternative orbital routes are developed) as the principal vehicular route through the town centre and to maintain the main vehicular routes to the waterfront area along the quays; to exploit any opportunities that arise to improve safety for both pedestrians and vehicles in the Town Centre and Waterfront area.

2. To include the following objectives

#### Arklow Town Centre Strategy Objectives

**VPXX** To seek to prepare an overall Main Street enhancement scheme to improve the street environment for all users, which may include widened footpaths, cycle facilities (where feasible), public realm improvements, and possibly accompanied by reduced speed limits.

#### Arklow Waterfront Strategy Objectives

**WZXX** To facilitate the development of new opportunities for pedestrian and cycle links from the Waterfront to the town centre.

**WZXX** In conjunction with the National Transport Authority, to carry out a feasibility study to investigate the possibility of connecting each side of the Waterfront zone.

#### Infrastructure, transportation & movement objectives

**ITXX** To facilitate the implementation of the GDA Cycle Network Plan.

Submission Number	A3	Prescribed Body	An Taisce
<b>Summary of Issues Raised</b>			
An Taisce requests the consideration of the following comments:			
<b>(a) New Residential Zonings</b>			
It is acknowledged the need for substantial residential development in Arklow and it is noted that a significant portion of the new residential zonings are to the north of the town. The focus should be placed on higher density residential development near the town centre and the train station, in line with the Sustainable Urban Residential Guidelines and the Wicklow County Development Plan (Section 4.3.3). The development of zoned lands should be phased and focused away from more sensitive greenfield sites such as Coolboy (AA4).			
<b>(b) Transport</b>			
It is noted that AA3 seeks the facilitation of a possible future third Avoca river crossing, however there is no detailed plan or timeline to improve access between the northern and southern portions of the town. The LAP should include an Implementation and Infrastructure Delivery Schedule. Without the relevant infrastructure, the proposed development will greatly increase traffic on the 19 Arch Bridge, exacerbate congestion in the town centre area, generate significant amounts of traffic on the M11 (hamper its function as a strategic transport corridor), cause congestion at the two motorway junctions and exacerbate car dependency. Land should not be zoned if there is no reliable prospect of providing key infrastructure.			
Until a Traffic and Transport Assessment is carried out, planning for such extensive residential and commercial development is considered premature.			
There is a need for a modal shift from private car use towards public transportation and passive transport (walking and cycling). The LAP broadly discusses cycling and pedestrian facilities however the LAP is deficient in outlining specific plans to improve passive transport. The LAP should advance specific plans for new or enhanced cycling infrastructure, especially in the areas of new development. This should include plans for appropriate cycling facilities based on road types and volume of use with emphasis on the provision of high quality cycle tracks.			
<b>(c) Wastewater Treatment</b>			
Arklow has no wastewater treatment system and all sewage is discharged directly into the Avoca River. Irish Water is in the process of planning a wastewater treatment plant for Arklow. Any significant development, as proposed in the LAP, could be problematic, presenting a risk to human health and polluting freshwater and marine environments, it also contravenes Wicklow County Development Plan Objective NH22: "To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent disposal systems in the vicinity of water bodies that provide drinking water or development that would exacerbate existing underlying water contamination."			
<b>(d) Industrial Development</b>			
Industrial zonings in Arklow should adhere to the sequential approach, particularly with regard to the Shelton Abbey development. It is acknowledged that this is a brownfield site with existing services however, development here constitutes leapfrog development, sets an undesirable precedent for unsustainable sprawl to the west of the N11 and promoting reliance on car-based travel. More appropriately located industrial zoning should be given development priority.			
<b>(e) Climate Change and Flood Risk</b>			
Although climate change adaptation is part of the overall plan vision, the plan lacks specific measures to both mitigate local greenhouse gas (GHG) emissions and adapt Arklow to the impacts of climate change. The LAP and accompanying Strategic Flood Risk Assessment do not include provisions for these increased flood risk, which should be taken into account in both the assessments and the proposed mitigation measures. The LAP should also include provisions for the inclusion of SUDS as part of the flood mitigation plans.			
<b>Opinion of Chief Executive</b>			

(a) It is not correct that "a significant portion of the new residential zonings are to the north of the town" or at peripheral locations away from the town centre and transport facilities. Of the c. 5,700 potential new units provided for in the plan, c. 40% are in the 'town centre', 'waterfront zone' and existing built up areas and c. 30% are located on the southern side of the settlement at Tinahask, contiguous to the town centre, adjoining the railway line. Of the remaining 30%, the majority is at AA3 Kilbride, which is contiguous to the built up area of the town on the north side of the river and directly adjoining schools, shops and community facilities. It is an objective of the LAP to ensure that the development of zoned land is phased in accordance with the sequential approach and in an orderly and sustainable manner – it is the stated policy of the council that "Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided" (quote page / objective number etc).

Therefore development priority is given to the areas closest to the town centre and existing built up area and development will occur in a sequential and sustainable manner from the centre out. The peripheral zoned area will only be considered for development where the other lands have been built out. The phased implementation of the zoned land is further detailed in the proposed Appendix D on 'Phasing and Implementation'.

(b) It is an objective of the draft LAP as part of the development of Action Area 3 at Kilbride that a third Avoca river crossing needs to be provided/ facilitated. This river crossing was identified a key part of the strategic transport network for Arklow in the 'Integrated Framework for Land Use and Transportation' report of 2003. The new crossing is needed as given the proposed growth of Arklow (a) 'The existing bridge and junctions will be unable to cope with the resulting volume of traffic' and (b) 'It would be undesirable for the increase in volume of traffic to pass through the roads adjoining the town centre'. Having regard to the proposed route of the crossing, along with the proposed Western Distributor roads, 'The results of the traffic modelling indicate this crossing provides a key role in facilitating movement around the town, and has a direct consequence of removing a significant volume of through traffic from the town centre'(extracts from the Arklow IFPLUT Study).As part of the phased development of the AA3 lands the necessary strategic road infrastructure has to be provided.

It is recommended that the draft LAP includes a delivery schedule of this road and all other infrastructure. It is also important to note that the majority of strategic infrastructure is to be provided by third parties (e.g. Irish Water, TII, etc) over which WCC has no control.

Objective **TR15** of the CDP states "Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Roads and Bridges' the 'Traffic & Transport Assessment Guidelines' (TII) and the Design Manual for Urban Roads and Streets (DoECLG & DoTTS).

It is an objective of the LAP as part of the infrastructure strategy for Arklow to "Promote the development of safe and accessible pedestrian, cycling and traffic routes". A number of specific objectives are referred to in the Town Centre Strategy and throughout the plan. This is further enhanced with the CDP objectives **TR9 – TR13** on cycling and walking. The '**Development and Design Standards**' of the CDP clearly seeks to ensure that accessibility is key in any new mixed use and housing development, with the encouragement of cycling and walking emphasised.

(c) It is acknowledged that Arklow has no wastewater treatment system and Irish Water (IW) is in the process of addressing this. The granting of planning permission for new significant development in the absence of such infrastructure is generally not facilitated by IW and WCC in recognition of their environmental and legal obligations.

(d) The employment opportunity site at Shelton is a brownfield site. This site has been in industrial/ employment use since the c.1960 with Avoca River Industrial Park currently in operation there. It is acknowledged that it is on the periphery of the plan however given that it is currently in active employment use and that it has number existing key infrastructural assets as set out in the draft LAP, it is not considered appropriate to downzone.

(e) This is the draft LAP, which sets out the land use policies and objectives for the plan area, in tandem with the objectives of the CDP and the CDP Climate Change Audit, the draft LAP has fully integrated mitigation and adaptation to climate change into its policies and objectives, therefore it is not recommended to amend the plan further. There is no local 'climate change adaptation plan' in place for Arklow at the moment however in a separate process to the LAP, WCC are in the process of preparing a 'Local Authority Adaptation Strategy' which will further enhance WCC's approach to adaptation to climate change and mitigate local green house gas emissions.

The Strategic Flood Risk Assessment has been carried out in line with the Planning System and Flood Risk Management Guidelines 2009 and has appropriately assessed the risk of flooding within the plan area. With regard to SUDS, objective **WI12** of the CDP states that it is an objective of the Council to 'Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system.'

**Chief Executive's Recommendation**

1. It is recommended to insert a phasing and implementation Appendix D (see Submissions No. 1)

Submission Number	A4	Name	Department of Education and Skills
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**Summary of Issues Raised**

(a) It is noted that the projected population targets remain as published in the issues booklet 23,000 by 2028. On that basis, the educational requirements remain as outlined in our submission to the preparation for the plan dated 11 November 2016 (extract below in italics), namely the requirement for two 16-24-classroom primary schools and one 1,000 pupil post-primary school. It is further noted that land has been zoned educational in the plan to accommodate that need in Action Area 1 and Action Area 2 at Tinahask Upper/Money Big.

*Using the projected population targets published in the issues booklet (23,000 by 2028) and applying the information used to calculate educational infrastructure requirements as set out in Appendix 1, the last 2 columns of the table below outlines the number of primary classrooms and the number of post primary school places which would be required to meet the projected increase in population as set out in the draft Local Area Plan, if this level of population growth was to materialise.*

Strategic Planning Area	2011 Population	2028 Population	Growth	National Primary School Going Average 12%	Potential Primary Classroom Requirement Based on PTR 27:1	National Post-Primary School going Average (8.5%) Deficit of Places
Arklow & Environs	13,066	23,000	9,934	1,192	44	844

(b) However, the draft plan also provides information in relation to housing targets to 2028 in Table 2.2, page 8. This table indicates an additional housing unit growth to 2028 of +5,726 units. At an occupancy rate for County Wicklow of 2.9 (Census 2016) that number of additional units would equate to an additional population increase of 16,605 to 2028 as opposed to a growth figure of 9,934 to 2028 indicated in the issues booklet.



	EXISTING POPULATION / POPULATION TARGET	EXISTING HOUSING STOCK / HOUSING STOCK REQUIREMENT	HOUSING UNIT GROWTH REQUIREMENT
2011	13,066	5,459	
2022	19,494	7,509	+2,050
2025	21,247	<b>9,838</b>	+4,379
2028	23,000		<b>+5,726</b>

Table 2.2 Arklow population and housing targets (Wicklow County Development Plan 2016)

Using the housing unit growth of 16,605 by 2028 and applying the information used to calculate educational infrastructure requirements as set out in Appendix 1 of the submission, the last 2 columns of the table below outlines the number of primary classrooms and the number of post primary school places which would be required to meet the projected growth of 16,605, if this level of growth was to materialise.

Strategic Planning Area	2028 Housing Unit Growth Requirements	Housing Unit Growth Requirement x occupancy rate for Wicklow (Census 2016)	Growth	National Primary School Going Average 12%	Potential Primary Classroom Requirement Based on PTR 27:1	National Post-Primary School going Average (8.5%) Deficit of Places
Arklow & Environs	plus 5,726	2.9	16,605	1,993	74	1,411

If none of these projected numbers were to be catered for in existing schools, this population growth would equate to the need for three new 16-classroom primary schools (expandable to 24-classroom) with special needs units. The post-primary numbers equate to one 1,000 pupil post-primary school with special needs unit.

While sites have already been zoned educational for two primary and one post-primary schools if the population growth based on housing units is to be applied it would be necessary to reserve a site for an additional 16-classroom primary school (expandable to 24-classroom) with special needs units.

Following an analysis of the existing capacity of post-primary schools in the area and projected demographic growth, it is expected that there will be sufficient capacity between existing schools and the 1,000 pupil post-primary school reserved in the pre-draft submission.

### Opinion of Chief Executive

(a) Noted.

(b) As set out in the Core Strategy of the County Development Plan 2016 – 2022, Arklow has been allocated a population target of 23,000 persons for 2028. Using an ‘average household size’ of 2.19 in 2028, this would require a housing stock of 5,726. The justification for the use of this 2.19 figure is set out in the County Development Plan and is based on the pattern of average household size decline evident up to 2011. This has not been adjusted to reflect any change in this pattern evident in the 2016 Census, as the CSO has not provided revised average household size projections for 2028 based on the 2016 Census result to date and the Minister for Planning / Regional Assembly have not advised that a revised average household size should be integrated into development plans at this time. Therefore until such a as time as any change may be made, 2.19 is being used for 2028 and the population target for Arklow of 23,000 in 2028 equates to a population growth of 9,934 (2011-2028) and a housing stock growth of 5,726.

The Department of Education bases it needs projections on population rather than housing stock growth and therefore it is unclear why the Department at this point is suggesting revised future educational needs based on housing stock numbers. In this regard therefore, their original needs assessment, based on population growth of c. 10,000 persons is the correct figure to use. This level of growth would result in a demand for 2 x 16-24 classroom schools and 1 x post primary, which the department acknowledges has been provided for in the draft plan.

### Chief Executive's Recommendation

No change

Submission Number	A5	Name	Environmental Protection Agency (EPA)
<b>Summary of Issues Raised</b>			
<p><b>(a) SEA General</b> EPA acknowledges that the Plan includes objectives for protecting the Plan's environmental sensitivities within the area and has welcomed that issues identified in the SEA have been incorporated into the Plan.</p> <p><b>(b) Action Areas</b> Wicklow County Council should consider the preparation of environmental management plans for proposed development in the Action Areas given the potential for likely significant effects on greenfield lands. These environmental management plans could coordinate the development of the Action Areas and consider traffic management, waste management, green infrastructure integration/protection/provision, surface water management/drainage, noise etc.</p> <p>EPA notes that certain new zoned lands are identified as being within flood risk zones A and B. Wicklow County Council should consider zoning and developing these lands relative to the flood risk identified and vulnerability of the land use to flooding in accordance with the Planning System and Flood Risk Management Guidelines (DEHLG/OPW, 2009).</p> <p><b>(c) Critical Service Infrastructure</b> EPA advises that the development of the plan area should be closely linked to the ability to service such developments with adequate and appropriate critical service infrastructure.</p> <p><b>(d) Relationship with Key Plans/ Programmes</b> Wicklow County Council should consider including a commitment to integrating the National Mitigation Plan, the Regional Spatial and Economic Strategies, the National Planning Framework and the Draft River Basin Management Plan for Ireland (DHPCLG, 2017), as relevant and appropriate to the plan area upon their adoption.</p> <p><b>(e) Specific Comments on the SEA ER</b> EPA notes the mitigation measures described in Table 8.1 and advise that the mentoring programme described in Section 8.2 of the Plan should include more information on the monitoring programme in place or to be put in place to monitor for likely significant effects, and the frequency over which this monitoring will take place. Where it is intended to align the monitoring of this Plan with the monitoring programme for the Wicklow County Development Plan, the SEA ER should consider including this information also.</p> <p><b>(f) Future Amendments to the Draft Plan</b> Any amendments to the plan should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and subject to the same method of assessment as applied in the "environmental assessment" of the Draft Plan.</p> <p><b>(g) SEA Statement</b> Following adoption of the Plan, an SEA Statement, should summarise the following:</p> <ul style="list-style-type: none"> <li>(i) How environmental considerations have been integrated into the Plan;</li> <li>(ii) How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;</li> <li>(iii) The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,</li> <li>(iv) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.</li> </ul>			
<b>Opinion of Chief Executive</b>			



**(a)** Noted

**(b)** It is not possible at the LAP stage to draw up an 'environmental management plan' for the development of the Action Areas as it has not yet been determined what format, quantum, density, use and layout of development will occur on these sites. This will only be finalised at the planning application stage, at which point all environmental management matters will be dealt with as a matter of course.

The only lands that are designated for development in Flood Zones A or B are those lands that have passed the 'Justification test' in accordance with the Planning System and Flood Risk Management Guidelines (DEHLG/OPW, 2009). In the event that development is proposed at such locations, appropriate measures to address flood risk, as required by the guidelines and the provisions of the County Development Plan, will be required as a matter of course.

**(c)** The Local Authority, as well as key service providers such as Irish Water, in recognition of their obligations under the Water Services Acts, the Habitats Directive and other legislation, monitor the cumulative effect of grants of planning permission on available infrastructure as a matter of course and do not approve / recommend the granting of permission for new development or connection of new development to existing services unless adequate infrastructure capacity is available or to be provided during the lifetime of any permission. In order to add clarity, it is proposed (as set out in response to submission preceding) to include a clearer infrastructural implementation / delivery schedule in this LAP.

**(d)** The commitment suggested is already set out in the County Development Plan and as a subsidiary plan to the County Development Plan, all of said obligations apply directly in Arklow. This is clearly set out in the draft LAP. Any higher order plans, policies and Ministerial guidelines etc that are relevant to this land-use plan have been considered in the drafting of the plan and integrated / referenced where necessary. However, it is not the role of the Local Area Plan, as a land use framework, to include objectives regarding / references to all EU and national primary and secondary legislation, guidelines and studies, as well as regional and local policies / programmes / that are in place as it would render the plan particularly cumbersome and impenetrable to refer to all such documents.

**(e)** Noted. This will be addressed as part of the SEA Statement.

**(f)** This is a legal requirement that will be carried out. Where amendments to the Plan are proposed, they will be screened for likely significant effects as per the same method of assessment applied in the environmental assessment of the Draft Plan.

**(g)** Noted. The SEA Statement will be prepared and will include the required information.

#### Chief Executive's Recommendation

**1.** It is recommended to insert a phasing and implementation Appendix D (see Submissions No. 1, Recommendation No. 9)

Submission Number	A6	Name	Irish Water (IW)
<b>Summary of Issues Raised</b>			
<p><b>(a) Water Services</b>                      Acknowledged that the Ballyduff WTP is operating at between 2.7-3.2 ML/D and it has an ultimate capacity of 6.1 ML/D equating to c.18,000pe.</p> <p><b>(b) Wastewater Services</b>                      IW acknowledges that untreated water is currently discharged into the Avoca River. The Old Wallboard Factory, North Quay, Ferrybank has been identified by IW as the proposed site for a WWTP and are progressing the preparation of a planning application for the plant and associated infrastructure.</p> <p>IW welcome the strategies, policies and objectives included in the Draft LAP that provide policy support for the proposed WWTP in particular;</p> <ul style="list-style-type: none"> <li>● <b>Section 2.2-</b> 'To facilitate Irish Water in the provision of necessary waste water infrastructure, in a sustainable manner'.</li> <li>● <b>Chapter 9- IT1</b> 'To support and facilitate the development of a waste water treatment plant in Arklow, at an optimal location following detailed technical and environmental assessment and public consultation'.</li> <li>● <b>WZ: WATERFRONT-</b> 'To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities. To also facilitate the provision of high quality new commercial, maritime, leisure, tourism and amenity uses at a scale that does not undermine the role of the existing Town Centre. To facilitate the extension and continued use of the existing employment, maritime and port uses within the zone. To facilitate the provision of a new Waste Water Treatment Plant with an appropriate high quality architectural design / appearance'.</li> </ul>			
<b>Opinion of Chief Executive</b>			
Noted.			
<b>Chief Executive's Recommendation</b>			
No change			

Submission Number	A7	Prescribed Body	Transport Infrastructure Ireland (TII)
<b>Summary of Issues Raised</b>			
<p><b>(a)</b> TII welcomes referral of the Draft Arklow &amp; Environs Local Area Plan, 2017 – 2023, and the opportunity to comment on emerging policies and development objectives scheduled in the Plan. The following observations are provided for the Councils considerations;</p> <p><b>(b) Strategic National Road Context</b>                      The M11/N11 corridor is a strategic road corridor of national significance providing access to the south east of the country, in addition to providing access to international markets for freight and tourist traffic through Rosslare Euro-port. It is noted and welcome that the Draft Plan acknowledges this strategic context.</p> <p>The Council will be aware that the DOECLG Spatial Planning and National Roads Guidelines (2012) require that the strategic function of national roads is maintained. Local transport solutions are required for traffic/trip demand generated by local development to ensure that such requirements can be catered for in a manner that is complementary to and consistent with the strategic transport function of the national road network. Planning Authorities must develop an evidence based approach to planning policy and undertake detailed transport modelling as necessary.</p> <p>A number of development designations and specific development objectives outlined in the Draft Plan have</p>			

the potential to directly impact the operation of the strategic national road network in the area. It is a concern to the Authority that, it appears, no evidence base has been undertaken to demonstrate that additional traffic loading generated by such proposals can be satisfactorily accommodated at the M11 national road junctions while safeguarding the strategic function of the network. Such a requirement was outlined in TII's submission on the pre-draft consultation relating to the Arklow & Environs Local Area Plan Review, is included in the DOECLG Guidelines and remains the position of TII.

It remains the opinion of TII that zoning proposals and/or development objectives in proximity to national road junctions, included in the local area plan, need to be supported by a required evidence base to demonstrate that the additional traffic loading can be satisfactorily accommodated at the junctions concerned while safeguarding the strategic function of the national road network. This requirement is particularly relevant to zoning proposals in proximity to Junction 20, R Special New Residential (Action Area 4 (AA4) Coolboy), and Junction 21, E1 Employment and E Special Employment.

### **(c) Specific Development Objectives**

**(c) (i) M11 Arklow Bypass, third interchange** - TII notes Objective IT6 includes the proposal to facilitate the construction of a new third interchange at Lamberton. As advised previously and in TII's recent observations in relation to the review and preparation of a new County Development Plan, the Council will be aware that such a proposal is not scheduled in the Authority's programme of work and is not a TII priority. A Motorway Order is required for the development of a new junction on the M11 and the Authority wishes to advise, as before, that it would not be supportive of proposals for a motorway junction at this location.

**(c) (ii) Leinster Orbital Route (LOR)** - The support for the LOR in Objective IT10 and Chapter 9 of the Draft Plan is noted. In relation to LOR additional linkage to Wicklow the Council will be aware that such a route from Arklow is not a scheme identified in the NTA Transport Strategy nor one for which national road investment funding is scheduled. However, it is acknowledged that it is beneficial to identify road schemes that are proposed to be delivered at a local level within the term of the Plan. Though, the Council will be aware that TII may not be responsible for financing these additional projects.

**(c) (iii) Action Area 4 (AA4) Coolboy, Arklow** - AA4 located in Coolboy is situated in proximity to M11, Junction 20. Although access to the subject lands is confirmed as being from Beech Road, the development of the lands, c. 220 residential units, in combination with other development proposals in the area has the potential to impact the strategic function of the national road network. Therefore, as outlined above, it is considered critical that there is a strategic transport assessment or other area based transport assessment undertaken to confirm that additional traffic loading generated by such proposals can be satisfactorily accommodated at the junctions concerned while safeguarding the strategic function of the national road network. Any required phasing or mitigation arising should be incorporated into the Draft Plan.

In addition, the mechanism/framework for agreeing the Action Area Plans does not appear to provide for any statutory stakeholder consultation nor for any formal integration into the local area plan.

The Council will be aware that the DOECLG Sustainable Residential Development in Urban Areas Guidelines advise that if it is intended to use such non-statutory documents for development management, planning authorities should incorporate them in the development plan or local area plan for the area by way of variation and where possible, public consultation should be integrated into the preparation on non-statutory frameworks. This is not evident in the proposals included in the Draft Plan and TII requests that this is clarified in the Plan prior to adoption.

**(c) (iv) E1 Employment and E Special Employment** - Lands in proximity to M11 Junction 21 are designated with E1 Employment and E Special Employment zoning objectives. Some lands being identified to the west side of the M11. TII acknowledges that the zoning designations in the area relate to existing and established zoning objectives and that certain zoning designations have been removed since the adoption of the last plan. However, in the interests of demonstrating that such development can be accommodated complementary to safeguarding the strategic function of the national road network, including with other proposed development

objectives such as the Port Access Route, TII recommends that a strategic transport assessment or other area based transport assessment is undertaken in accordance with the requirements of the DOECLG Spatial Planning and National Roads Guidelines. Any required phasing or mitigation arising should be incorporated into the Draft Plan.

**(d) Transport assessment**

TII requests that the local area plan is subject to evidence based transport assessment, in accordance with the requirements of the DOECLG Spatial Planning and National Roads Guidelines, to confirm the extent of development planned can be accommodated complementary to safeguarding the strategic function of the national road network.

**(e) Action Area processes**

It is also requested that the framework/mechanism for adopting Action Area Plans is clarified and includes appropriate stakeholder consultation between TII and the Executive of the Council.

**Opinion of Chief Executive**

**(a)** Noted.

**(b)** An IFPLUT study (integrated framework plan for land use and transport) was prepared for Arklow in 2003, which set out a blueprint for the development of the town up to 2016 and beyond. Although it is acknowledged that some years have passed since it was prepared, this study examined land use and transport options for a target population of 21,000, covered a geographical area more extensive than the current plan boundary (less the former IFI site), it made provision for growth in employment of the town by c. 12,500 jobs<sup>11</sup> and therefore it is considered that its principles and recommendations are still broadly applicable. This study identified a number of transport objectives / interventions required to allow for significant development to the south of the town (around Tinahask) and to the north (Kilbride) including the port access route and a new third bridge across Arklow Marsh between the M11 and the 19 Arches Bridge, which would allow for traffic circulation within the local road network, without impacting on the strategic function of the M11. The development strategy for Arklow town and its environs which emerged post the completion of this study (both plans were updated in 2006) forms the basis of the strategy that has developed for the settlement in the intervening years and as set out in the draft plan.

In this regard, the CE is satisfied that there is no element in the draft plan that would encourage unnecessary use of the M11 for local traffic movements and that local traffic emanating from existing or proposed new zoned land in the plan area can be accommodated by the local road network subject to the development of new / improved road infrastructure as detailed in the plan.

With respect to the concern that it has not been shown that the additional traffic loading generated by new development in Arklow can be satisfactorily accommodated at the M11 national road junctions while safeguarding the strategic function of the network, the growth and development parameters that are contained within the draft plan are consistent with all national, regional and County development strategies, which have been in place for many years and certainly since 2010, which should have provided the TII ample time to factor in the traffic generation coming out of and into Arklow in the longer term. The TII appears to be suggesting that the growth of Arklow should be dictated by the capacity of the M11 and its junctions; however, it is suggested that this is not the correct interpretation of the Ministerial guidelines.

There is no logic behind the concern that traffic emanating from proposed new zone AA4 in particular would result in unacceptable traffic movements on the M11 because of its proximity to Junction 20 when the access point into these lands on Beech Road is likely to be c. 1.7km from Junction 20, the same distance as AA3 (which is not mentioned as a concerning zoning) although it is much more significant is zone in size and

<sup>11</sup> In comparison to the jobs target of this draft LAP of 8,240 by 2028

potential traffic generation than AA4.

With regard to employment zones in proximity to Junction 21, these are long standing zonings that have been an objective since at least 1999, and are considered appropriate for employment development, being located immediately contiguous to the built up part of the town and to the M11. While the priority for employment growth in Arklow is the town centre, which is best served by public transport, these edge of centre employment sites are considered essential to allow for manufacturing, light industry and other employment types requiring larger land parcels. It is completely logical that such uses be located close to the principle form of transport needed for the movement of goods. (i.e. high quality roads).

**(c)(i)** It is noted that the TII does not support the inclusion of this objective. While it is accepted that this may not have funding or be a priority at present, the Arklow by-pass was designed and constructed to allow for the future connection and it would appear short sighted therefore to remove this objective. The maintenance of such objectives also ensures that any development proposals in the area of this possible interchange will be appropriately managed to ensure they would not impede its delivery. Therefore it is not recommended that this objective be omitted.

**(c)(ii)** Noted

**(c)(iii)** This is addressed above.

**(c)(iv)** This is addressed above.

**(d)** There is no requirement in the DoECLG Spatial Planning and National Roads Guidelines that a local area plan be subject to 'transport assessment' to confirm that the extent of development planned can be accommodated complementary to safeguarding the strategic function of the national road network. The only reference to 'transport assessments' in the guidelines is the requirement for TTAs 'Traffic and Transport Assessments' for major planning applications affecting national roads. It is considered that the draft plan addresses the requirement of said guidelines as they relate to development plans, in particular the provisions of Box 2.3 'Overall recommended content for development plans and local area plans'.

**(e)** As noted in Chapter 11 of the Draft Plan Action Area Plans are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the Action Area during the plan period. Separate applications for sections of each Action Area will not be considered until an overall Action Area Plan has been agreed in writing with the Planning Authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area. The detail provided in this plan, which is subject to consultation with all stakeholders (public, prescribed bodies, transport providers etc) is considered more than adequate to allow for an informed assessment to be made of the possible impacts arising from the development of the land e.g. clear detail is provided with regard to the quantum of housing that would be permitted, road routes etc. A further stakeholder input is of course available through the planning application process.

#### Chief Executive's Recommendation

No change

## Section 3.2 GROUP B - GENERAL SUBMISSIONS (PUBLIC INDIVIDUALS AND GROUPS)

Submission Number	B1	Name	Arklow Chamber of Commerce (ACC)
<b>Summary of Issues Raised</b>			
<p>This is a lengthy submission with 16 subheadings, some of which provide facts or commentary about Arklow and some of which make suggestions for the plan</p>			
<p><b>(a) The past</b></p> <p>ACC described how Arklow Town has evolved in the past 70 years and suggest WCC should learn from the past plan for what the town will be like in the 21<sup>st</sup> century. It is suggested that WCC should plan for a longer time frame than a 6 year plan</p>			
<p><b>(b) The Future - Primary Objectives</b></p> <p>When the Arklow by-pass was constructed, the expected reduction of traffic in town centre did not materialise and due to the expansion of population and increased car ownership, the town centre is once again choked with traffic. By taking a longer term view of what the town could be like in 2050, WCC can plan with a vision for the future and make Arklow the most desirable town in the east of Ireland in which to live.</p> <p>ACC agrees with the vision set out on page 1 of the Plan but suggest that more longer term radical strategies need to be put in place. Arklow has significant natural and infrastructural advantages, and if planned in the right way to maximise strengths, population, skills and enterprise will be attracted to the area. As a secondary growth centre in the region, the population is expected to double by 2040. To achieve this growth, radical changes to the town structure are required to avoid traffic congestion, fragmentation of the town centre and retain a central focus to the business and social areas.</p>			
<p><b>(c) Town Expansion</b></p> <p>The town is restricted to the east and west by the coast and bypass – this creates a particular consideration in regards to expansion north and south. The area immediately outside the town boundary should be reserved for residential development with industrial development located further north and south. Commercial development should where possible be developed within the existing town. Consideration should seriously be given to an expansion of the town centre area by extending development for town centre facilities to an area of approximately 60 acres on what is at present part of the marsh - National Heritage Area. It is acknowledged that this proposal may receive opposition; however land areas were reclaimed in the past and to the benefit of the town. It is suggested that the new area would contain complementary facilities to the Main Street area, incorporating new shopping, civic and amenity uses. This area could be linked by a new bridge to the extended river bank proposed along the south bank (see to follow) and by a new road system to the Dublin Road and Kilbride areas. ACC indicates that they are looking at a wider picture for the next 20-50 years in putting forward this proposal it is suggested that if the long term development of the town is not considered within this type of time frame, WCC will never get beyond the patching-up stage of town development and road system.</p>			
<p><b>(d) Transportation and Road System</b></p> <p>Arklow suffers badly from a poor road system which has evolved in a haphazard way, which gives rise to the poor circulation system and congestion now experienced. We need to look radically at the road system and implement a plan of action to improve it. The following suggestions are made:</p> <ul style="list-style-type: none"> <li>(i) New road from the bridge to the Vale Road along the southwest bank of the river, joining Vale Road below St. Saviour's Church,</li> <li>(ii) Completion of Castlepark Road and exit onto Parade Ground near Fr. Murphy Statue</li> <li>(iii) Construction new roundabout at south side of 19 Arches bridge</li> </ul> <p>This proposal would require realignment of the river upstream of the bridge to facilitate, which would also allow for the development of an amenity area along the river. The river could be widened by excavation along the north bank to compensate and increase flow capacity. It is appreciated that the marsh acts as a flood</p>			



buffer but it is suggested with proper engineering analysis, it should be possible to reconfigure the river drainage capacity.

This road would also be a logical crossing point for a new bridge to connect to the Kilbride area.

Related to this suggestion, it is further suggested that a way-leave to preserve the land to allow for this new road and that development on the river side between Arklow Bridge and Coomie lane should be restricted to commercial and tourism related development. There should be continuity of façades along the riverbank.

#### **(e) Residential Expansion**

North of the river: It is believed that the Seabank / Killinskyduff area is being proposed by the Council as an industrial area. It is suggested that this is a logical residential expansion area for the town. Industrial development should be located further north with enough residential land retained for expansion for the next 50 years or so. The lands to the west of the Dublin Road should also be zoned for residential / amenity.

South and west Arklow: On the south side there is more land zoned residential than on the north due to it being within the town boundary. However the area within the town boundary will be inadequate over the longer term and land should be reserved for strictly residential purposes,

#### **(f) Building Densities**

The report on 'Land Use and Transportation' highlighted the need to increase the density of housing development in the town centre to improve sustainability of land use, allowing people to live close to amenities and reduce car dependency.

#### **(g) Building heights**

The Plan should have a new approach to the maximum height of buildings; some areas should have buildings in scale with their surroundings, particularly when fronting onto large open areas, or expanses of water such as the river or the Irish Sea. This would give a better use of the scarce land resource and provide a better relationship of people to structures. The Bridgewater development is an example of 'scale to location'.

#### **(h) Amenity & Leisure development**

**North Beach Area** - The protective embankment should be further developed with a promenade facility from the North Pier to Porters Rock. The completion of groins at the North Beach should be expedited to allow sand deposits to build up, and give the town back its sandy beaches. This was part of the original scheme but was dropped to save money at the time. This change has proved to be a very short sighted view.

**South Beach Area** - Arklow is fortunate to have as an amenity one of only 150 golf links in the world. The fact that this is in the centre of the town, surrounded by industry and housing, makes it rare still and it is believe to be one of less than 10 such amenities in the world. The protective embankment as an amenity should be further developed with a proper walking surface from the south pier to Roadstone.

#### **(i) Marina Development**

The existing marina is too small to cater for the long-term development of sailing and boating in Arklow. Undeveloped lands east of the existing marina should be earmarked for the expansion of this facility. This would build on one of the key assets in the area. Room for pleasure craft on the river is limited and has reached saturation level.

#### **(j) Arklow Concert Hall / Theatre**

The ACC proposes that a concert hall / theatre / conference facility be included in the plan, ideally located on the north side of the river in the new town extension or alternatively near the other amenities in the north beach area. This would bring a positive spin off to the tourist industry and was part of the ACCs submission to the 1999 Development Plan.

#### **(k) The south quays / docks, north quay area**

ACC recommend that the South Quay is now in need of an overall development strategy to maximise its potential. It is suggested it should be possible to produce an overall plan incorporating part of the dock as a marina, with high density development of shops, apartments, restaurants, hotels etc.

With regard to the North Quay Area the submission acknowledges that this area is being redeveloped and that the old Wallboard site is going to be the location for the Wastewater Treatment Plant. It is put forward that it is important that the plant is designed so as not to be intrusive or a nuisance to the adjacent areas. The plant should be fully enclosed.

**(l) Pedestrianise the Main street**

ACCs submission advises that the central shopping area could be enhanced by pedestrianising and landscaping the Main Street from the Bridge Corner to Bank of Ireland making the area more attractive to residents and visitors. ACC suggests this could be possible if traffic were diverted around the town in accordance with the roads / traffic suggestions already made in submission.

**(m) Car parking**

Submission suggests that car parking needs to be improved. The ACC submission suggests the Castle Park car park be developed into a multi-storey car park.

**(n) Arklow by-pass and access to the town**

The submission suggests that it would be possible to provide a low cost junction from the bypass to the Vale Road using the new bridge at Lamberton. By providing slip roads to this bridge from the by-pass and a new road parallel to the by-pass road down to the Vale Road with a T- junction at the Vale road. This would allow the hinterland area and future residential sections of the community in this area to use the by-pass and contribute to a traffic situation in the central part of the town. Access to the town should be left to the people who need to do business in the town. At present people from the hinterland area must still come through the town to get to Dublin.

**Opinion of Chief Executive**

**(a)** Noted.

**(b)** As per Section 19 of the Planning and Development Act 2000 (as amended) Local Area Plans are carried out at least every 6 years, with a lifetime generally for a period of 6 years, and Ministerial guidelines on development plans suggest zoning should be framed in a 9 year horizon. However as noted in Chapter one of the Draft Plan, *'the aim of this plan, in conjunction with the County Development Plan, is to enhance and facilitate the balancing of economic, social and environmental infrastructure in order to maintain and develop a high quality of life without compromising the protection of the environment and the needs of future generations.'* In this context, a longer term view up to 2028 is incorporated into the plan. However, this is nowhere near the 20-50 year timeframe being advocated in this submission, which does make sense, given the length of time it takes to deliver major infrastructure in particular. However, in the absence of population, housing and employment strategies and targets for the longer term from the Government and the Regional Authority, it is not possible to 'plan' for such a long time frame as objectives, zoning etc in such LAPs must be framed within the context of the higher level strategies.

**(c)** All of the ideas set out have been carefully considered. The new roads proposals are evaluated to follow. At this time, it is considered that the zoning of the Arklow marsh for town centre expansion cannot be justified. There is considerable land within the town centre (including the quays and waterfront areas) for considerable expansion of the town, both in terms of commerce, shopping, living and recreational / tourism development. These are brownfield lands, within existing services, with many vacant sites and buildings, and the priority at this time and for the foreseeable future should be this area. Furthermore, the natural heritage of the area is considered important to protect; the marsh is a pNHA so designated for the significance for wildlife and habitats and its character and value is described by the NPWS as follows:



*"This site is now the principal wetland area in Arklow. It is a large marsh located north of the Avoca estuary on the perimeter of Arklow town. A disused roadway bisects the site from east to west. Much of the site is dominated by Common Reed (*Phragmites australis*), with Creeping Bent (*Agrostis stolonifera*) and Common Valerian (*Valeriana officianalis*) common in places. On the southern side, numerous scattered bushes of willow (*Salix spp.*) are growing among the Common Reed, forming a scrub in places. Drier areas are characterised by large tussocks of Tufted Hair-grass (*Deschampsia cespitosa*). Other plants present include Soft Rush (*Juncus effusus*), Yellow Iris (*Iris pseudacorus*), Skullcap (*Scutellaria galericulata*), Lesser Pond-sedge (*Carex acutiformis*) and several other sedges (*Carex spp.*). Wet grassy areas with extensive stands of Water Horsetail (*Equisetum fluviatile*) occur on the north-east margin, with Creeping Bent, Common Spike-rush (*Eleocharis palustris*), Meadowsweet (*Filipendula ulmaria*) and rushes (*Juncus articulatus* and *J. conglomeratus*) present. The scarce Broad-leaved Cottongrass (*Eriophorum latifolium*) has been recorded growing on this site.*

*"The importance of this site is that it is a good example of a relatively large wetland, despite the impacts of atmospheric pollution and its proximity to Arklow town. The presence of at least one scarce plant species increases the interest of the site."*

**(d)** The new road proposals (other than those relating to opening up the marsh for town centre redevelopment) have been evaluated:

- (i) Extension of Castlepark - This proposal has been considered in the past and did not receive support from the elected members; it is understood, primarily, due to the adverse impact on the grounds of the parochial house to the west. It is considered however an excellent suggestion that should be reconsidered in light of the benefit, it could be brought to the Main Street by having an alternative route through the town.
- (ii) Road along southern river back to Vale Road - This route has similarly been considered in the past where issues with the feasibility of linking such a route to the Vale Road were raised. It is considered that reclaiming the south bank of the river, even if there were compensatory river widening on the northern side, would not be optimal in terms of flood management, which is a priority in the town centre, as this would create increase the curvature of the river, with potential adverse impacts arising from longer path for water would have to traverse to the sea and for sediment transportation.

**(e)** Seabank and Killinskyduff are not identified as industrial development areas in the draft plan and may indeed be suitable for long term future residential development; however as this time, the population and housing targets do not justify its designation / identification, even in the long term, for such use. It is not clear what lands are referred to as 'west of the Dublin Road' for residential, and amenity use; the lands wets of the Dublin Road on the north side of the town comprise a wedge of lands between the Dublin Road and the M11, some of it steeply sloping down to the M11 and some occupied by existing dwellings and utilities. Where the land is wider and levels out at the southern end, this is proposed for residential development in the draft plan.

It is not clear what is being requested with regards to lands to the south of the town but the draft plan does zone all of the lands between the built up part of the town and the Clogga Road for either residential or employment development.

**(f)** As stated in the CDP 2016 *"It is an objective of the Council to encourage higher residential densities at suitable locations, particularly close to existing or proposed major public transport corridors and nodes, and in proximity to major centres of activity such as town and neighbourhood centres. Maximum densities will normally be ascribed to each parcel of zoned / designated residential land in the relevant local plan. Densities are crafted following an assessment of the capacity and characteristics of the land in question, in the interests of providing the most compact and sustainable form of development. In order to achieve the housing growth targets set out in the Core Strategy, it is important that maximum densities are achieved, except where insurmountable impediments arise."*

Furthermore Objective H3 of the Draft Plan states *"In order to make best use of land resources and services, unless there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands. The Council reserves the right to refuse permission for any development that is not consistent with this principle. The Council reserves the right to refuse permission for any development that is not consistent with this principle."*

Chapter 11 of the Draft Plan states that *'Whilst the land-use zoning will give an indication of the acceptability or otherwise of particular uses in particular areas, proposed development will also be assessed in terms of compatibility with the development control guidelines and standards outlined in the Wicklow County Development Plan and this plan. Factors such as density, height, massing, traffic generation, public health regulations, design criteria, visual amenity, availability of services and potential nuisance by way of noise, odour and air pollution are also of importance in establishing whether or not a development proposal conforms to the proper planning and sustainable development of an area.'*

In light of these objectives, it is considered that the plan makes adequate provision for higher densities at appropriate locations and the appropriate density for new build residential areas at the edges of the town.

**(g)** The draft Plan sets out specific objectives in relation to height in the town centre and in the Waterfront zones:

**VP6** *To protect and enhance the streetscape of Arklow Main Street through the appropriate control of alterations to existing buildings and the development of new structures; in particular building and roof lines and heights which diverge from the established form will require to be justified.*

**WZ2** *In the Waterfront Zone to allow for high-density development (up to a plot ratio of (2.5:1) and up to 4 storeys in height along water frontages and 3 storeys elsewhere.*

**Objectives OP1** - *A maximum height of 4 storeys fronting onto Upper Main Street/ Parade Ground shall be permitted.*

**Objectives OP2** - *A maximum height of 3 storeys fronting onto Main Street shall be permitted.*

In light of these objectives, it is considered that the plan makes adequate provision for higher buildings at an appropriate locations and the appropriate height for new build areas.

**(h)** The issues raised in the submission are noted; however a protective embankment is outside the remit of the Local Area Plan. There is merit in this proposal therefore it will be passed onto the Municipal district for their information. A Local Area Plan is not a 'works', 'operational' or 'spending' plan for Arklow for the next 6 years, it sets in place the land use strategy for Arklow for the lifetime of the plan.

**(i)** One of the objectives for the waterfront zoning is to 'to facilitate the continuation of the existing employment, maritime and port uses. The extension of the marina would come under this zoning objective.

**(j)** The CE would support the development of a concert hall / theatre in Arklow; in order to facilitate the development of such a use, the plan includes ample land zoned for mixed use, such as the 'town centre' and 'waterfront' zones, which would be the ideal locations for such a use.

**(k)** The issues raised in the submission by ACC are noted. As stated in Chapter 5 of the Draft Plan, the Waterfront area is identified as a key area within Arklow with a strategy to facilitate the existing and future sustainable economic development of the area and associated activity, whilst allowing for expansion and improvement of amenity and recreational opportunities, for the development of a wider mix of uses including residential, retail / commercial, maritime, tourism and community uses, and providing for a high level of protection of the environment and natural assets such as the beach, river and sea. The provision of the wastewater plant at the north quay location will be the subject of a planning application where the external appearance will be assessed to ensure there is minimal impact on the surrounding area. The lands are all zoned for 'Waterfront - mixed use development' and therefore cognisance of this will have to be taken in the

design and planning assessment of the application for the WWTP.

**(l)** While this is an excellent suggestion, until such a time as alternative routes are developed, that obviate the need to use the Main Street as the primary north-south vehicular thoroughfare through the town, pedestrianisation cannot be facilitated. It is considered that the priority in the short to medium term should be the development of these routes and the enhancement of the Main Street through, for example, widened footpaths, enhanced crossing, enhanced landscaping / street furniture etc. This is an objective of the plan.

**(m)** There is an abundance of usually free car parking at the Bridgewater Shopping Centre, the shops on the Wexford Road and other edge of centre locations. There is also a considerable amount of off street public parking in and around the town centre. In this regard Objective VP4 of the Draft LAP states

With regard to car parking to facilitate the following;

- to maintain existing and provide new car parking options as funding allows, in proximity to the Main Street and along 'dark pink' routes.
- to avail of opportunities to remove public on street car parking on the Main Street and at amenity areas, subject to due consideration of the commercial needs of Main Street, including loading parking.
- to require new development on the Main Street to incorporate pedestrian links, where feasible, to existing or new public car parks.
- deviations from the minimum car parking requirement (as set out the County Development Plan) shall be considered in the Main Street Strategy area as shown on Map 5.1 where a public car park is within 200m walking distance to the site. In such cases, only the needs of long-term users (e.g. employees and residents of the development) will have to be addressed by the developer.)

**(n)** It is an objective of the plan to provide for a third junction on the M11.

**Chief Executive's Recommendation**

No change

Submission Number	B2	Name	Arklow Active Retirement
<b>Summary of Issues Raised</b>			
<b>(a) Town Centre</b>			
A centrally located 2 storey car park would be ideal, especially with the proposed Primary Care centre bringing increased footfall to the Main Street and it will help remove the car parking off main street.			
A footbridge downstream of the 19 Arches bridge would increase access and links and open up the waterfront area.			
<b>(b) Housing</b>			
The LAP expects developers to supply housing which will vary 'in type, size and tenures' while WCC refuses to take responsibility for the provision of housing for those unable to afford accommodation. Perhaps Arklow MD could lead the way and take advantage of central government incentives to address this problem.			
Some vacant sites near the Main Street could be zoned for sheltered housing units, this enables the elderly to live near all the services they need			
<b>(c) Community</b>			
Arklow needs a Multi-Purpose Community resource centre, the Arts and Cultural centre and Local Multi-Purpose Community Space/Meeting Rooms.			
The marshy area of Shelton should be reclaimed as a Peoples' Park with access via a new bridge linking the Kilbride AAP to the town centre.			
<b>(d) Tourism &amp; Recreation</b>			

Given the tourism assets within Arklow and the LAP's aim to develop the tourism potential, why not make this journey easier for all tourists and fund/encourage a tourist train /bus with guided commentary in different languages during the summer months.

A more visible Tourist Office is needed with adequate signage and parking. The Alps is an ideal site for this along with a central museum (marine, cultural, artistic and industrial history, a theatre, gardens, open space for a transport terminus (tourist buses/taxis) and adequate car parking.

#### **(e) Built & Natural Heritage**

The empty industrial silos beside the South Quarry deserve to be preserved and appreciated.

The Old Kilbride cemetery with its Pyramid need to be protected from vandalism.

The unusual layout of what was once a small fishing village in Tinahask deserves to be explained visually in the same way Kynochs Walk has been done.

#### **(f) Transport Access**

The mention of a wish to see local roads enhanced with connections to national routes in close proximity to Arklow is welcomed. This needs to include better access for the heavy traffic to enter or exit the port (e.g. via the Clogga area and not the town centre).

Traffic from Carlow/Aughrim have to go through Arklow, a new slip road onto the M11 is needed here. Many from south Wicklow head to Gorey as opposed to Arklow.

AA3 Kilbride needs access to the M11, as with the proposed new schools in the area, the Dublin road will become congested with traffic.

#### **Opinion of Chief Executive**

**(a)** There is no specific objective in the draft LAP for a car park within the town centre, however it is acknowledged that there are a number of car parks throughout the town centre and any new development, like the health centre will have to address the issue of parking provision as part of any proposal. Should a car park be proposed at an appropriate location within the Town Centre, such uses are open for consideration in the TC zone.

With respect to the linkages suggested, objective VP9 of the draft LAP seeks *"To support opportunities to create better linkages between the Main Street, the river, the north and south quay and the beaches, in particular access routes and views between the two"* and objective WZ9 seeks *"to support the development of a footbridge across the entrance to south dock"*. It is also recommended to include objectives *"To facilitate the development of new opportunities for pedestrian and cycle links from the Waterfront to the town centre"* and *"In conjunction with the National Transport Authority, to carry out a feasibility study to investigate the possibility of connecting each side of the Waterfront zone"*. (see recommendations 3 (b) and 3(c))

**(b)** The issues raised are a matter for the Housing Department of the Council, rather than a local area plan, which is a land use framework, rather than a services delivery plan. The submission has been passed onto the Housing Directorate for their consideration in their Housing plans.

**(c)** Community uses are permissible in all zonings; however the actual delivery of community uses is not within the remit of the draft LAP. WCC providing community buildings is a matter for the annual budget and the Local Economic and Community Plan. The marshy area of Shelton is zoned OS2 which facilitates the development of a recreational park with an objective to have a link from the Kilbride AAP. The actual delivery of such community uses including a park and link is not within the remit of the LAP, however it is a recommendation of this CE report to include an implementation schedule (see recommendation No. 9).

**(d)** The draft LAP in conjunction with the CDP fully facilitates the development of the tourism industry in Arklow, however the delivery of any tourism initiative, tourist train/bus or tourist office is not within the remit of the LAP.

**(e)** It is noted that the submitter would seek that the empty industrial silos beside the South Quarry are

preserved and appreciated. Adding a structure to the Record of Protected Structures (RPS) is carried out through a separate process to a LAP, therefore it cannot be considered as part of this plan making process. However, it is intended that all such requests will be considered in an overall review of the RPS in late 2017. The Old Kilbride cemetery is on the RPS, therefore any development proposal would have to take this protection into consideration. It is not within the remit of the LAP or RPS to protect a structure from vandalism. The provision of tourist display board at Tinahask, like that at Kynock, while an excellent suggestion, is not within the remit of a LAP.

(f) Noted. The plan includes objectives for the provision of a third access off the M11 (IT6).

#### Chief Executive's Recommendation

No change

Submission Number	B3	Name	Arklow Heritage/Nature Walks Development Company Limited
<b>Summary of Issues Raised</b>			
<p>(a) The submitter is requesting that the plan includes an objective for a new footbridge across the Avoca River, west of the 19 Arches Bridge, to allow for access from the town to Arklow marsh, to enhance recreational use of the marsh.</p> <p>(b) The submitter is also requesting that the Council should state its commitment to provide for public access to the marsh and promote the development of the marsh for amenity purposes.</p>			
<b>Opinion of Chief Executive</b>			
<p>(a) While it is noted, as set out in the submission, that there have been difficulties in securing access into the marsh from Ferrybank, this is still considered the optimal and most cost effective solution as it would not involve the considerable cost associated with building a new bridge (for which no funding stream is available at this time). Wicklow County Council, in partnership with the OPW, is currently developing a flood protection scheme which is likely to include measures around the marsh and along both banks of the Avoca River, and flood protection, rather than access, is the immediate priority for the Council in this area. It is too early to say at this time how this will affect the river banks or access arrangements to the marsh as a final design has not been drawn up or approved. It cannot be said at this time if the inclusion of such a footbridge could be accommodated within the scheme. It is therefore considered to include such an objective would be premature. (It should be also noted that the proposed bridge does not appear to connect to any existing amenity route / right of way etc so this proposal is more complex than simply a footbridge).</p> <p>(b) It is an objective of the plan <i>'to maintain the favourable conservation status of all proposed and future Natural Heritage Areas (NHAs) in the plan area in particular the Arklow Marsh'</i>. It is considered that this objective could be enhanced to address the concern raised e.g. <i>'To maintain the favourable conservation status of all proposed and future Natural Heritage Areas (NHAs) in the plan area in particular the Arklow Marsh and to support environmentally sensitive measures to enhance the understanding and enjoyment of such natural areas'</i>.</p>			
<b>Chief Executive's Recommendation</b>			
Amend Objective HT1 as follows:			
<p><b>HT1</b> To maintain the favourable conservation status of all proposed and future Natural Heritage Areas (NHAs) in the plan area in particular the Arklow Marsh <i>and to support environmentally sensitive measures to enhance the understanding and enjoyment of such natural areas'</i>.</p>			

Submission Number	B4	Name	Arklow Positive Ageing
<b>Summary of Issues Raised</b>			
<p>With regard to the above the submitters would like to know what is happening to our town of Arklow. In the last few years the town has gone from bad to worse. There is no life or soul left in what was once a great little town and people were proud to say that they were from Arklow. There is only a handful of shops actually trading and as time goes on I'm sure that one or two will eventually close altogether.</p> <p>People used to come from all over to stay in Arklow and now it's only used as a drive through on weekends and even then there is traffic mayhem. What was the idea of putting two Zebra crossings so close to one another at the bottom of the main street?</p> <p>When people come to stay at the Arklow Bay Hotel and want to go explore Arklow where can they go? Around the duck pond or up the river bank? There is not much to see, our pottery has gone, the fishing has gone, the beaches are gone, grant that we have a beautiful golf course but then everyone might not play golf. Where can the youngsters meet? All our dance halls have gone, no disco's anymore either, there is no civic pride left in Arklow. There are a few groups of volunteers who do their best and try and keep the town tidy, then on the other side of the coin there are those who could not give a toss.</p> <p>Take the 56 for example what is happening to the premises? Same goes for the old Morgan Doyle building, the Marine Hotel and all the other vacant premises around our town they are becoming an eye sore.</p> <p>Come on Arklow and take a leaf out of Gorey town and let us get back up on our feet and be proud once more.</p>			
<b>Opinion of Chief Executive</b>			
<p>The submission raises a range of issues within regard to the health, attractiveness and 'liveability' of Arklow. While many of these issues are not land use related and the LAP cannot directly address same, the purpose of having an up-to-date LAP is to ensure a positive land use and planning framework that can encourage and facilitate development and growth.</p> <p>The Council acknowledges that economic activity has been declining in Arklow for many years, and that life has ebbed away from the Main Street. The Council is working very hard through a number of mechanisms to try to turn this around, including:</p> <ul style="list-style-type: none"> <li>●The establishment of a 'town team' – this group includes a number of committees of local people, elected representatives and Council officials, committed to the improvement of the town. Important projects in train include: (a) security improvements in the town, including erection of CCTV, (b) marketing and promotional activities, including the production of a promotion video and website / online profile development (c) launching of public survey to establish the issues facing residents and seeking suggestions for improvements in the town, (d) development of a digital notice board for the town, (e) numerous heritage and public realm projects including improvements to the parade ground, public realm / street furniture improvements (cognisant of need of the elderly, (f) investigations into accessibility improvement, (g) working with businesses and retailer in conjunction with retail excellence Ireland to make the town more retail friendly; there is a strong desire to make Arklow Wicklow's next 'age friendly' town. It should be noted also that 5 new shops have opened in Arklow in the last 2 months.</li> <li>●The development of the new council offices and library on the Main Street, rather than on some peripheral greenfield site, to reflect the Council's commitment and desire to draw activity back into the centre; approx 2,000 people use the library every week.</li> <li>●The resurfacing of the Main Street and implementation of a flower basket scheme – all in an effort to make the town centre more attractive;</li> <li>●Ongoing investigations into the implementation of the Derelict Sites Act and the Vacant Sites Levy, as well as</li> </ul>			



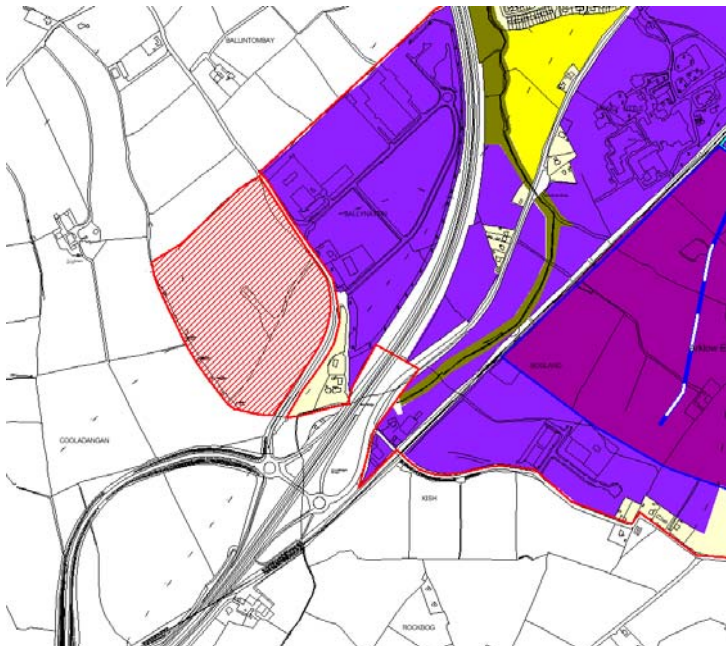
use of planning enforcement mechanisms, to try to address dereliction, vacancy and inappropriate / unauthorised works and uses.

**Chief Executive's Recommendation**

No change

Submission Number	B5	Name	Arklow Shipping
<b>Summary of Issues Raised</b>			
<p><b>(a)</b> Traffic on the 19 Arches bridge is constantly congested. A new bridge and relief road is necessary. Objectives IT5 (Kilbride to Coolgreaney bridge/road) and IT6 (3<sup>rd</sup> interchange), both of these key pieces of infrastructure are needed now and not in the long term.</p> <p><b>(b)</b> It is acknowledged that the process for the delivery of the Waste Water Treatment Plant is underway however pending its construction future development should be permitted with temporary solutions. The proposed location of the WWTP is unsuitable given its proximity to existing residential and it will have a negative impact on the potential of the lands to the North Quay which should be for mixed use development.</p> <p><b>(c)</b> Flood Risk is a significant issue for the town and it is acknowledged that there is a flood defence scheme in process. The north and south quay walls should be raised by at least 1m and as soon as possible to protect existing and future development. The existing coastal defences at the North Beach should be raised by at least 2m and extended to the 'Spion Kop'.</p>			
<b>Opinion of Chief Executive</b>			
<p><b>(a)</b> It is acknowledged that the traffic congestion on the existing 19 Arches bridge needs to be addressed; the Council is committed to finding solutions to this problem in the short, medium and long term as the town develops. In particular, the plan has provided for the development of a second bridge and the possible third interchange on the M11, and for a development strategy of high density development close to the existing built up part of the town as well as enhanced pedestrian and cycling routes which will allow residents to access services without using their car. It is recommended as part of this CE report (recommendation no. 9) to include an 'Infrastructure Delivery Schedule' which presents a timeframe for the delivery of such infrastructure. It is important to note that most of the proposed infrastructure is developer or state funded and that the delivery of this infrastructure is outside the remit of a LAP.</p> <p><b>(b)</b> With regard to the Waste Water Treatment Plant (WWTP), the provision of the plant at the north quay location will be the subject of a planning application where the external appearance and emissions will be assessed to ensure there is minimal impact on the surrounding area. The lands are all zoned for 'Waterfront mixed use development' and therefore cognisance of this will have to be taken into consideration in the design and planning assessment of the application for the WWTP.</p> <p><b>(c)</b> The suggestions raised with regard to the flood defence scheme are not within the remit of the LAP. WCC in conjunction with the OPW are currently carrying out the preparatory work (which included public consultation stages), including Environmental Impact Assessment report (EIAR) for lodging the planning application for the flood defence scheme works.</p>			
<b>Chief Executive's Recommendation</b>			
No change			



Submission Number	B6	Name	Myles Balfe
<b>Summary of Issues Raised</b>			
<p>The submitter is the owner of 15ha of lands situated to the south west of the town in Ballynattin (as shown here in hatched red on the map).</p>			
			
<p>These lands are zoned 'Tourism' in the 2011 – 2017 plan and it is proposed to omit it from the LAP 2017 – 2023. This submissions seeks that the lands are included in the Arklow LAP and zoned for Tourism for the following reason:</p>			
<ul style="list-style-type: none"> <li>-the lands have been zoned in the previous Arklow plan.</li> <li>-the lands are located adjacent to the M11 junction 21.</li> <li>-the lands have c. 50% road frontage with excellent sight lines.</li> <li>-the lands are currently undeveloped however they are along-side the IDA Business Park</li> <li>-planning permission was granted under PRR04/2092 (extended for 5 years under PRR10/2857) for a proposed integrated tourism, recreation, leisure complex including hotel, conference centre, leisure centre, swimming pool and car parking. This was not enacted because of the downturn in the economy and it has now since lapsed.</li> <li>- The tourism industry is vital to County Wicklow as can be seen from the vision of the draft LAP, zoning this land for tourism will allow for the owner to develop the tourism industry of Arklow.</li> <li>- The owner has been in discussions with the Moran Hotel group to operate a hotel at the site.</li> </ul>			
<b>Opinion of Chief Executive</b>			
<p>The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.</p> <ul style="list-style-type: none"> <li>● Following the review of the 2011 plan zonings it was considered that given the location of these lands on the western side of the M11 on the south western edge of the plan, to retain this zoning within the settlement boundary of Arklow would not be in line with the 'sequential approach' to zoning whereby 'leapfrogging' to peripheral lands is to be resisted and it would be contrary to best planning practice to consolidate settlements.</li> <li>● The development of tourism and tourism accommodation at appropriate locations is fully facilitated through the objectives of the CDP. Any future application for tourism development at this site will be assessed under the objectives of the CDP where objective T10 states <i>"To facilitate the development of a variety of quality accommodation types, at various locations, throughout the County"</i>.</li> <li>● The proposal is not in accordance with principles of proper planning and sustainable development and it is not recommended.</li> </ul>			

<b>Chief Executive's Recommendation</b>
No change

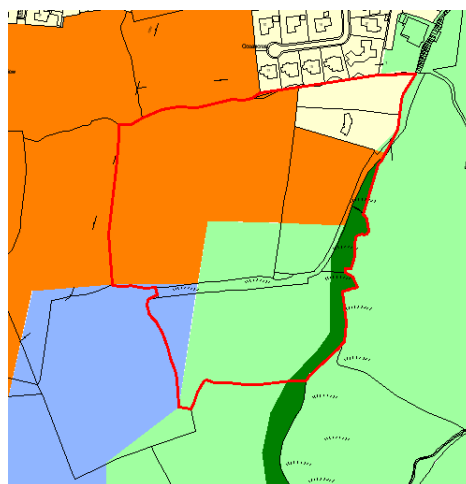
<b>Submission Number</b>	<b>B7</b>	<b>Name</b>	<b>Danny and Shane Bermingham</b>
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**Summary of Issues Raised**

The submitters are the owners of lands situated to the south of the town in Action Area 1 (within red line boundary). The lands are zoned Active Open Space (AOS), Community & Education (CE) and New Residential (R28) in the draft LAP.

They are seeking that the CE and AOS zonings are relocated closer to the existing residential areas and the delivery of these uses are shared by all land owners in the area, as it was in the Town Plan 2005 – 2011. (*'A large portion of this Community, Education and Open Space is now proposed for my clients lands'*)

The Town and Environs plan 2011 – 2017 had a hatching on this Action Area with no specific zonings, the uses were then to be agreed and shared between action area land owners. This was fair for all landowners. It is also noted that in plans prior to 2005 all of this land was zoned Residential.



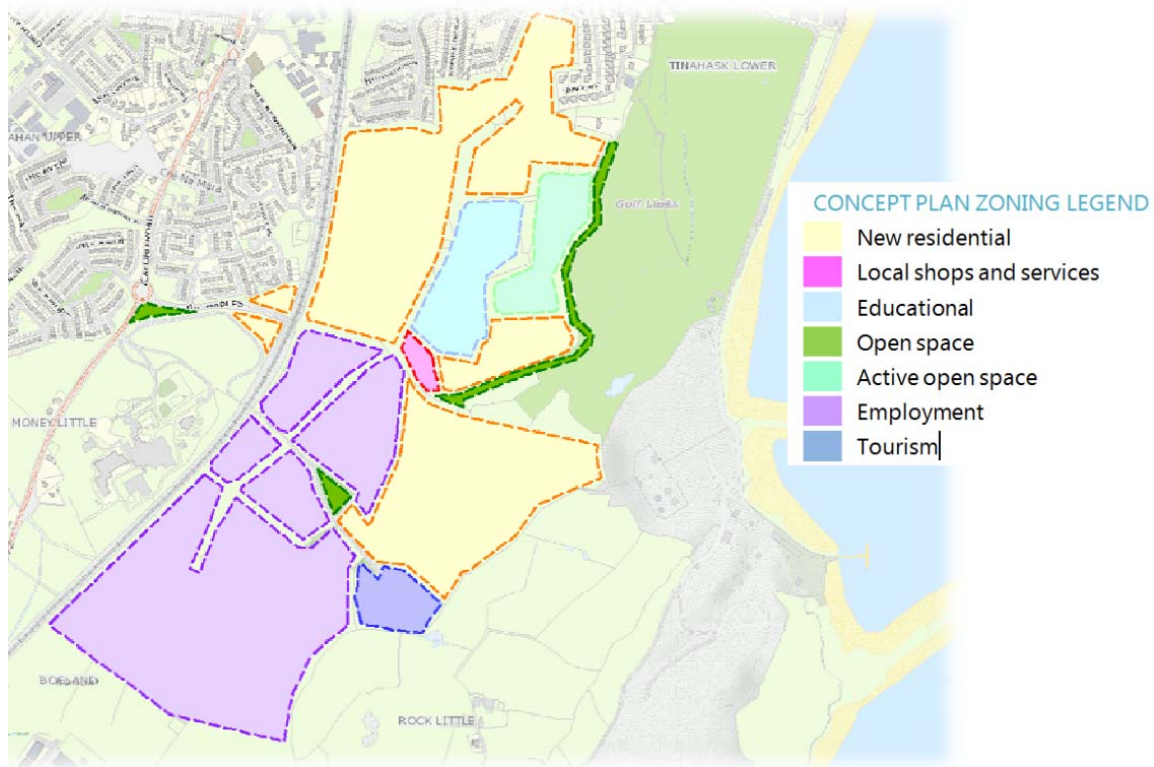
The submission sets out the following request:

1. Leave the zonings as 'Action Area' with no specific land use zonings shown, so that the CE and AOS provision can be agreed equitably between the land owners.

**Opinion of Chief Executive**

The Land Use Zoning map shows these lands as AOS and R28 (with a minor portion of CE) and these lands are within Action Area 2.

The draft LAP clearly sets out that "Action Area Plans (AAP) have been identified in the plan where necessary. Action Area Plans are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the Action Area during the plan period. Separate applications for sections of each Action Area will not be considered until an overall Action Area Plan has been agreed in writing with the Planning Authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area. **The position, location and size of the land use zonings as shown on the plan map are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out for the Action Areas.** The total quantum of development in each use type set out for each action area will however be required to comply with the criteria set out for that action area, as should phasing proposals where relevant."



Map 11.2 Concept plan of AA1, AA2 and zoned lands to the at Money Big/Bogland

The lands at Tinahask Upper, Abbeylands, Money Little & Money Big have been designated for major development in Arklow. In the conceptual layout for this area, the lands have been laid out to allow for a new 'neighbourhood' to develop. Key parameters that have lead to this concept layout include:

- The necessity of the provision of a Port Access Road, the improvements of the existing link road and railway bridge from the Knockmore roundabout, and new area distributor roads through this action area to both AA1 and the 'Special Employment' zoned lands to the south.
- The area will require a 'local shops and services centre' which will provide for the local retail and services needs of the resident population but will also include a school campus with the need for new active open space to serve both the future residents of the area and the wider area.

As set out in the draft LAP 'The 'local shops and services' district is at the centre, on the port access road, providing a sense of place and identity for the new neighbourhood within Arklow. The school campus is adjoining these services with the active open space adjacent the schools to facilitate school usage. The school campus site is located in the centre of the residential districts, facilitating the pupils walking to school. The open space is adjoining the golf club lands enhancing the green infrastructure assets within the new neighbourhood and these assets are linked throughout the neighbourhood with the road network and the linear park to the local centre. The employment lands have been clustered within one district of the neighbourhood adjacent to the existing employment lands to the west and proposed employment lands to the south.'

Therefore it is not recommended to amend the proposal as the specific uses of the lands will be set out as part of the AAP agreement.

**Chief Executive's Recommendation**

No change

Submission Number	B8	Name	Patricia Brennan
<b>Summary of Issues Raised</b>			
<p>The submitter is a resident of Arklow and outlines a number of transport issues including:</p> <p><b>(a)</b> The draft LAP does little to alleviate transport congestion in the town, especially on the Dublin Road. The proposed new developments and population is welcomed however the road planning should be revisited. There are no proposed roads to alleviate / support the traffic that is going to all the key destinations in Arklow.</p> <p><b>(b)</b> Objectives <b>IT2</b> (existing access roads) and <b>IT4</b> (facilitate road improvements) are welcomed however they are still inadequate to support increase in volume of traffic.</p> <p><b>(c)</b> The submitter uses the M11 if travelling from Kilbride area to Knockenrahan and is of the opinion that no one in the east of the town would travel that far west to access the proposed western distributor road (Objectives <b>IT5</b>). This road proposal would be far more effective if the road could be fed from both east and western sides of the town. As IT5 leaves Kilbride it should be through the centre of the proposed developments. As it reaches the marsh to the north of the river it could link with the old Ferrybank / Shelton road. If it is not feasible to run through the marsh all the way from east – west, it should run just north of the marsh and south of Inbhear Mor Park. At the east end it opens on Ferrybank between Sheltonville surgery and Cannon’s shop. There are several properties for sale here, that could be acquired. The council could look at making this a roundabout with an entry / sliproad to Bridgewater via Stringers Lane. This would alleviate a lot of the congestion on the old Dublin road heading into town. It would also open up a good transport link to Shelton area. To the west this IT5 could continue as proposed with new bridge at western end.</p> <p><b>(d)</b> Move the train line from inside the M11 and use the train route as a new road through the town, the route is ideal and access a number of existing destinations and zoned lands.</p> <ul style="list-style-type: none"> <li>• This new road could have a cycle track.</li> <li>• Historically, people walked to the train station to get the train. Now we drive to it. The new train station could be sited at Kish, just off the M11. It could have new large surface carpark that would accommodate commuters / travellers from south Wicklow and north Wexford. Iarnrod Eireann could consider having one station north of town and another at the south.</li> <li>• This new proposed track could be a double track allowing trains to pass each other while travelling rather than waiting, leading to more efficiency. This would open up the land currently used in Arklow town at the train station and car park for development. This new proposed route would also be extremely cost efficient, as south of the river no new properties need be acquired.</li> </ul> <p>This new version proposed IT5 road / old train line travels directly through the proposed development to the south of the town. It would also link well with new southern port access road.</p> <p>This southern port access road could link to the new train station at Kish and goods to / from could be transported by train.</p> <p>IT6 (third interchange), IT7(AA1 &amp; AA2 links) &amp; IT9 (Southern port road) would still be valid and connect very well with this new proposed IT5 on the train line.</p> <p>IT11 (footpath &amp; cycle improvements) would not now be required. We could have an excellent cycle track on new road where train line is and cyclists could travel from the extreme north of the town to the south in a cycle lane.</p>			
<b>Opinion of Chief Executive</b>			
<p><b>(a) &amp; (b)</b> There is a number of road improvements and new road objectives in the LAP (objectives IT1 – IT14). It is recommended as part of this CE report (recommendation no. 9) to include an 'Infrastructure Delivery Schedule' which presents a timeframe for the delivery of such infrastructure. It is important to note that most of the proposed infrastructure is developer or state funded and that the delivery of this infrastructure is outside the remit of a LAP.</p>			



(c) The layout of the roads within the AAP's will be defined as part of the action area agreement and the planning applications. The LAP fully facilitates the provision of new roads at appropriate locations. It is recommended as part of this CE report (recommendation no. 9) to include an 'Infrastructure Delivery Schedule' which presents a timeframe for the delivery of such infrastructure. It is important to note that most of the proposed infrastructure is developer or state funded and that the delivery of this infrastructure is outside the remit of a LAP.

(d) There is some merit in the proposal to move the train line and to use the existing line as a link through the town; this would be a matter for the National Transport Authority (NTA) and Irish Rail. Currently Irish Rail has no proposals or long term proposals for such works and such works do not form a part of the NTA's Transport Strategy, therefore the plan has been crafted in light of the existing location of the train line and station. Given the merit of the proposal it will be passed on to the NTA as they are responsible for strategic travel planning.

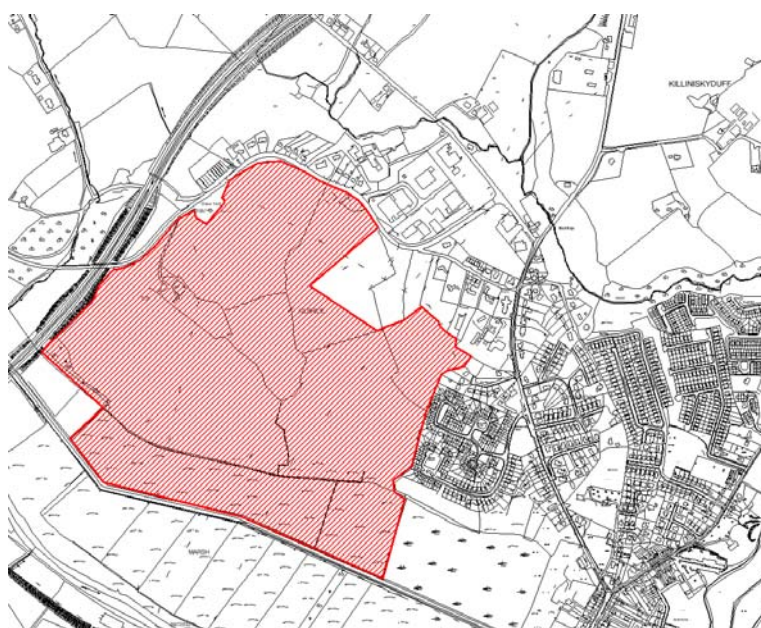
**Chief Executive's Recommendation**

No change

<b>Submission Number</b>	<b>B9</b>	<b>Name</b>	<b>Dawnhill Properties Limited and Windhill Properties Limited</b>
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**Summary of Issues Raised**

This submission is on behalf of the owners of 77ha of land at Kilbride, Action Area 3, north of Arklow (as shown here in hatched red on the map).



(a) The submitter firstly wishes to record their broad support for the Draft LAP and the objectives for the Kilbride lands in particular which generally align with their ambitions to progress development of these lands over the coming years.

(b) The majority of the submitter's landholding is located within Kilbride Action Area 3 (AA3) which is identified as a location for significant development during the life of the next LAP (c.50ha is zoned residential to deliver up to 1,500 new units). The vast majority of the residential area and all of the Local Shops and Services (LSS) area is controlled by the submitter. The submitter also owns the Open Space zoned areas. These are in addition to the standard public open spaces that will be provided throughout the new residential areas.

**(c)** The positive draft LAP, the quantum and mix of zonings proposed, in tandem with the significant recovery of the residential housing market, has led the submitter to earmark this landbank for development in the short to medium term. The first objective will be to prepare a comprehensive Action Area Plan (AAP)/Masterplan for the lands which will be the blueprint for comprehensive and integrated development of the lands over the short, medium and long-term. The AAP will identify a series of phased residential character areas, to be built in tandem with a network of open spaces (both passive and active) and sustainable transport networks for pedestrian and cyclist connections between existing and new residential areas, and the provision of a local services centre and school site. The AAP will incorporate and phase the construction of site development roads. The configuration of these roads will be agreed with WCC and the road layout will be optimal to serve both access to and within the Kilbride Action Area. This will also ultimately provide connection to the south edge of the AA3 and to the possible third bridge of the Avoca River (on third party lands south of the AA3) and which will be subject to a separate route option assessment per Objective IT5 of the LAP. This AAP will be prepared in conjunction and agreement with the Planning Authority. The submitter's then intends to proceed to planning (within the coming year) for a Phase 1 residential led scheme on the northern/eastern portion of these lands adjacent to existing residential areas and the identified school site.

**(d)** The Draft LAP zones 5.4ha of land for *CE Community & Education* within AA3 in order to provide a future school site. The CE notes that the Department of Education recently purchased 5ha of the submitter's landholding as per the map below for the future school. This has left a 0.4ha residual area which is zoned CE under the Draft LAP but which the Department of Education has no interest in purchasing or developing. The submitter therefore requests that this area be rezoned *R28 New Residential* as per the adjoining landbank.

**(e)** As noted above the submitter controls a significant portion (c.15ha / 37 acres) of the adjoining Arklow Marsh to the south which is currently outside the AA3 area. It is requested that the AA3 be extended to include this area thus ensuring that all of the submitter's landholding is within the Action Area Plan. The marsh area has significant amenity, visual and sustainability potential for the new community of Kilbride and this potential can best be realised if the lands form part of the AA3 and the overall comprehensive masterplan that will be agreed with the planning authority in due course.

**(f)** The submitters fully supports the objective of providing a wide range of residential estate designs. However the submitters would query the appropriateness of setting an arbitrary maximum size of 150 for individual housing estates at this stage (the 4th bullet point on page 58). The location, range and extent of estates will naturally emerge within identifiable character areas following detailed survey of the lands. Subsequent estate typologies will identify a range of sizes. It is suggested that the specific capping of estate sizes therefore be left to the AAP stage when a more accurate estate size can be identified and agreed.

#### Opinion of Chief Executive

**(a)** Noted.

**(b)** Noted.

**(c)** Noted.

**(d)** Noted and it is recommended to amend the Action Area Plan to include the full land holding.

**(e)** Noted and it is recommended to amend the Action Area Plan to include the full land holding.

**(f)** The development and design standards of the CDP clearly states that *"The maximum size of any greenfield housing development will depend on the size of the town and the requirements of the town plan / local area plan, but shall not be greater than 100 units where only traditional houses are proposed or 200 units where there is a mix of houses and apartments. Any development exceeding this number shall be broken up into a number of distinct 'estates', even if accessed from a shared road, with materially different architectural styles."*

With objective HD17 stating "The maximum size of any single 'housing estate' shall be 200 units and developments that include more than 200 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes." The issue raised by the submitter is noted. Therefore having regard to the CDP objective which is applicable to this site, it is recommended to amend the bullet point to omit the 150 and replace with the CDP's standard of 200 units.

### Chief Executive's Recommendation

It is recommended to amend Action Area 3 Kilbride as follows and to make any changes consequent throughout the LAP

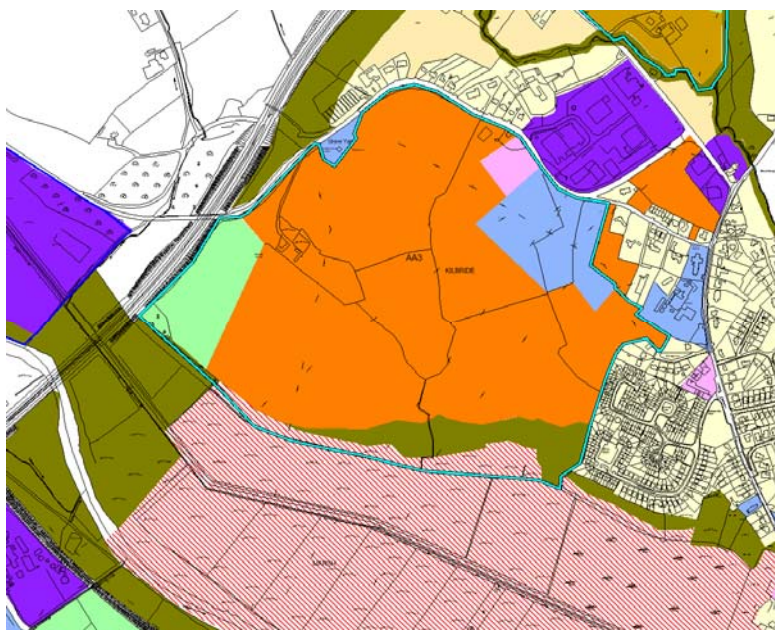
(a) Amend the following:

#### ACTION AREA 3 KILBRIDE

This Action Area is located in the townland of Kilbride. This Action Area measures c. ~~66~~ 81ha and is bounded to the north by local secondary road L-6179 Ticknock – Kilbride (the Kilbride – old IFI plant road) to the east by existing developed areas mainly in residential and community / educational use, to the south by Arklow Marsh and to the west by the M11. This Action Area shall be developed as a mixed residential, community and open space zone in accordance with the following criteria:

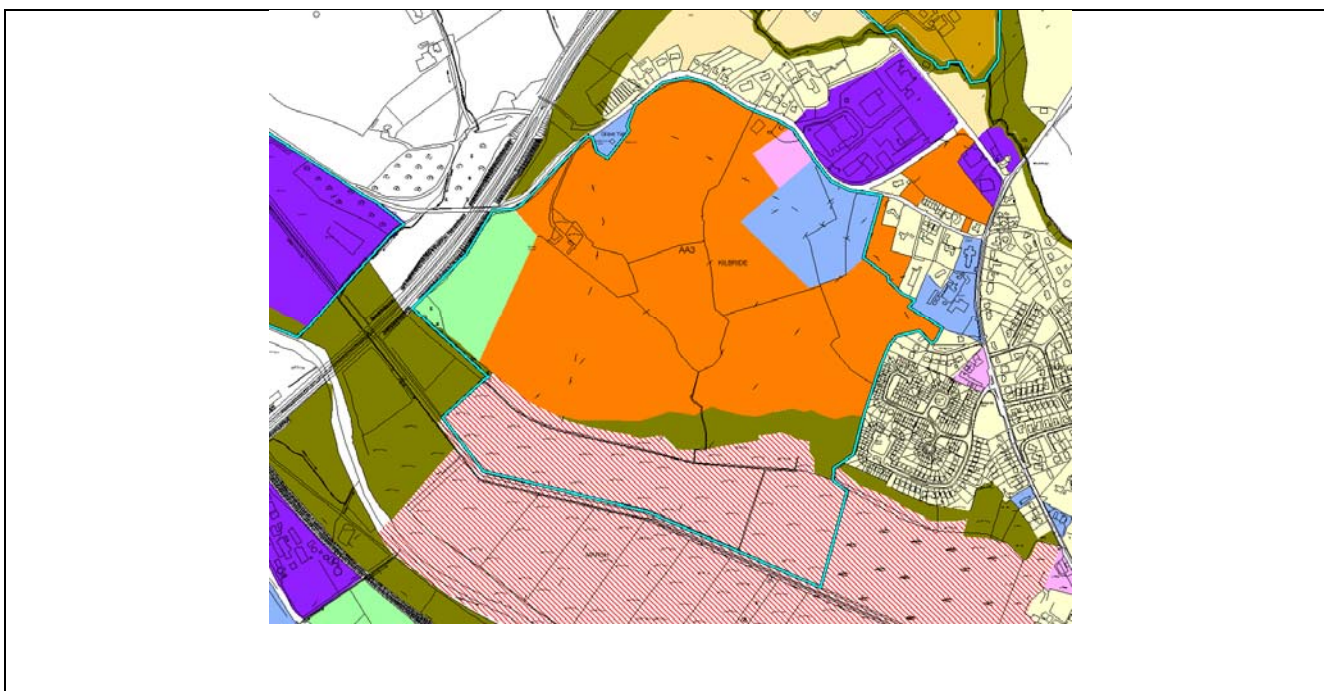
- To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceeding ~~150~~ 200 units), each containing materially different house designs within an overall unified theme.
- A minimum of ~~5.4~~ha shall be reserved for the provision of a school campus, subject to consultation and agreement with relevant stakeholders, including the Department of Education and Skills;

(b) Amend the Action Area boundary and zonings from:



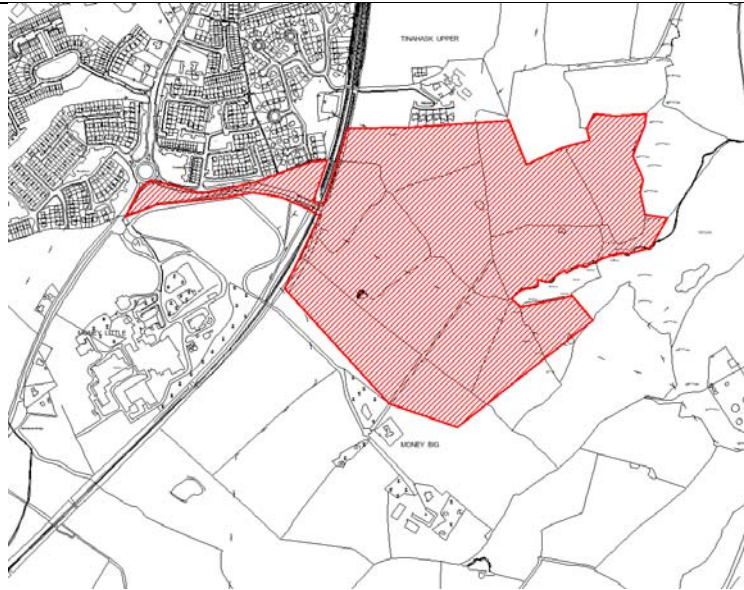
To:





Submission Number	B10	Name	Friends of Glenart
<b>Summary of Issues Raised</b>			
With the development of the Kilbride to Coolgreaney road/ bridge over the river, it is requested that pedestrian and vehicular access to Glenart forest be maintained without having to cross a major road.			
<b>Opinion of Chief Executive</b>			
The detailed design and layout of the western distributor road / bridge over Avoca will be the subject of a planning process with an opportunity for the public to view and make submissions on crossing and access points. There is an existing link from Coolgreaney into Glenart, and any proposed development here will have to incorporate the existing link into its proposals. Objective TR13 of the CDP seeks <i>"To facilitate the development of cycling and walking amenity routes throughout the County"</i> . It is thus not considered necessary to amend the draft LAP.			
<b>Chief Executive's Recommendation</b>			
No change			

Submission Number	B11	Name	Gerard Gannon Properties
<b>Summary of Issues Raised</b>			
Gerrard Gannon Properties are the owners of a c. 39.6ha at Tinahask / Moneybig in Arklow South, that forms part of Action Area 2. (as shown here in hatched red on the map).			



**(a)** It is the wish and intent of the submitters to develop these lands in an orderly and sustainable manner ideally within the period of the proposed Local Area Plan. Development of the site has been delayed by several factors. In the first instance development could not be permitted due to inadequate capacity in the absence of public utilities and later the change of economic circumstances halted any consideration of further investment in the short term.

**(b)** In general, the submitters welcome the draft LAP as published. The plan will allow for the sustainable development of Arklow and will permit an orderly disposition of the submitters' lands. In particular, the submitters welcome the flexibility afforded in the type of scale of development allowable

**(c)** The submitters consider that the provision of commercial and business construction is excessive for this location. There is considerable provision for Employment Zoning throughout the town and environs in the LAP. This location on the edge of Arklow with its excellent access to public transport and the national road network is an ideal land bank for the development of affordable starter homes. It is requested that the land zoned residential is increased by 5ha with a reduction in the employment lands.

**(d)** The LAP correctly envisages phased development of AA1 and AA2. It is acknowledged that overall AAs must be agreed for the lands prior to individual or separate planning applications being made. This however restricts the immediate potential of parts of the site. The submitters made an application under PRR16/31 for a small housing development on their land lying to the west of the railway line. This application was subsequently withdrawn on the grounds of prematurity and in anticipation of the review of the LAP. Gannon Properties wish to commence development at the earliest possible opportunity to derive some economic benefit from the property. It is therefore requested that the wording of the LAP (p55) be reviewed to ensure that a small development could take place before final agreement on the AAs which will be influenced and possibly delayed by issues surrounding the delivery of the proposed Arklow Waste Water Treatment Plant.

**(e)** The plan allows for the zoning of new residential developments on the land under R28 and R20. These provide for up to 28 and 20 units per hectare respectively. It has been the submitter's recent experience that these densities are considered too low by An Bord Pleanála. The submitter recently obtained a decision to grant permission for a development on the edge of Gorey Town in County Wexford. This decision was previously refused by ABP primarily on the grounds that the density did not comply with DEHLG Guidelines on Residential Density. This was published in a national newspaper highlighting the low density as reason for refusal. The associated ABP Inspectors Report stated that density should be between 35 and 50 units/ha and that in no circumstances should it fall below 30/ha. The LAP should allow for development at a residential

density which would be considered appropriate by An Bord Pleanála who can be expected to review any proposed developments. Based on our recent experience a designation of R30 (30 /ha) may be prudent.

#### Opinion of Chief Executive

(a) Noted.

(b) Noted.

(c) The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.

It is important to note that:

(a) The population and employment target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;

(b) Based on this population and employment target, an appropriate amount of land has been zoned for housing and employment to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);

(c) Enough land has been zoned in the plan to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom';

(d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for housing and employment development.

The rezoning of these lands from 'Employment' to 'New Residential' would increase the residential development potential within the settlement and allow for the population of the settlement to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.

The proposal is not in accordance with principles of proper planning and sustainable development and it is not recommended.

**(d) As set out in the draft LAP "Action Area Plans (AAP) have been identified in the plan only where necessary. AAP's are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the Action Area during the plan period. *Separate applications for sections of each Action Area will not be considered until an overall Action Area Plan has been agreed in writing with the Planning Authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area*".**

With regard to the plot of land to the west of the railway line it is considered necessary to include this in the Action Area Plan as significant road infrastructure is needed to access the AAP2 lands and given their location adjacent to the existing access road and railway bridge it is considered prudent to include these lands within the AAP.

Therefore the proposal is considered not in accordance with principles of proper planning and sustainable development and it is not recommended.

**(e) It is not recommended to increase the maximum density requirements within AA2 of the draft LAP. As stated in the CDP 2016 "Maximum densities will normally be ascribed to each parcel of zoned / designated residential land in the relevant local plan. Densities are crafted following an assessment of the capacity and characteristics of the land in question, in the interests of providing the most compact and sustainable form of development. In order to achieve the housing growth targets set out in the Core Strategy, it is important that maximum densities are achieved, except where insurmountable impediments arise."** Objective HD5 states "In order to make best use of land resources and services, unless

*there are cogent reasons to the contrary, new residential development shall be expected to aim for the highest density indicated for the lands<sup>12</sup>. The Council reserves the right to refuse permission for any development that is not consistent with this principle."*

Further to this the Local Area Plan Guidelines seek a "minimum density of 35 – 50 dwellings per hectare in urban areas of suitable size and population where local circumstances warrant, particularly in high-capacity public transport corridors". Albeit these lands are alongside the Dublin-Rosslare rail line, it is not a high-capacity public transport corridor, the proposed density of 28 units per hectare is considered appropriate given the growth designation of Arklow, the location of these lands within the settlement and the existing residential character of Arklow. (It is important to note that as set out in the 'Development and Design Standards' of the CDP, the density here refers to dwellings of 125sqm, with commensurate increased (or decreased) numbers if dwellings smaller (larger) than this are provided. Thus a scheme of starter houses with an average floor area of 100m<sup>2</sup> could achieve an actual density of 35 dwellings/ha consistent with this draft plan.)

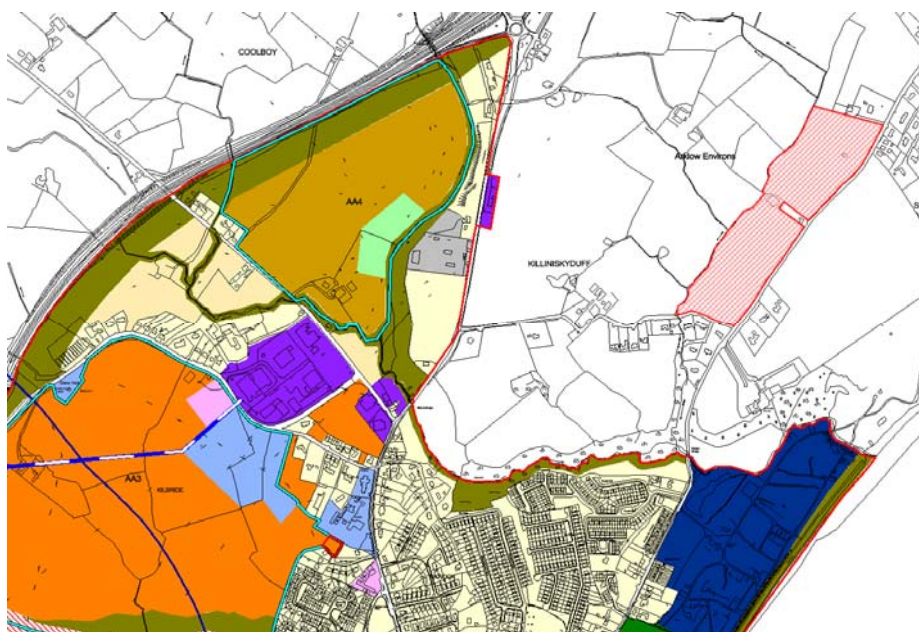
**Chief Executive's Recommendation**

No change

<b>Submission Number</b>	<b>B12</b>	<b>Name</b>	<b>Ian Heffernan</b>
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**Summary of Issues Raised**

This submission is on behalf of the owners (owners name is not stated) of 10.92ha of land at Killiniskyduff, north of Arklow (as shown here in hatched red on the map).



The lands were zoned 'Employment' and 'New Residential' in the 2011 – 2017 plan and it is proposed to omit these lands from the LAP 2017 – 2023. This submissions seeks that the lands are included in the Arklow LAP and zoned for Low Density residential for the following reasons:

- the lands have been zoned in the 2 previous Arklow environs plans.
- additional lands have been zoned at Coolboy at the expense of these lands.
- the Action Area lands require significant infrastructure to be developed while these lands do not.
- Zoning these lands for residential will complement the existing residential area and would not adversely

<sup>12</sup> Unless specific in the relevant local plan, the density objective for any particular lands shall be drawn for the principles set out in the Development and Design Standards appended to the CDP



impact on the existing roads. A temporary treatment plant is all that is needed to ensure the site is serviced and deliverable.

### Opinion of Chief Executive

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.

It is important to note that:

- (a) The population target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- (b) Based on this population target, an appropriate amount of land has been zoned for housing to meet the requirements of the target population, (having regard to expected household size and assuming a range of densities);
- (c) Enough land has been zoned in the plan to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom';
- (d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development.

The rezoning of these lands from 'unzoned' to 'R10' (low density) would increase the residential development potential within the settlement and allow for the population of the settlement population to extend beyond that allocated under the Regional and County population allocations and would therefore be considered not consistent with the Regional and County Strategy.

- It should be noted that the southern portion of these lands (5.6ha) were previously zoned 'R2 - New Residential – Low Density, local need housing' and the northern portion was zoned Employment (E2) as part of a large employment site at Killiniskyduff.
  - Following the review of the 2011 plan zonings it was considered that the 2011 plan was over-supplied with employment zonings. Enough employment land has been zoned in the LAP to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom' and the employment target for the settlement must be consistent with the CDP and RPG. Hence the employment lands have been down zoned and the previously zoned residential lands are not in a suitable location to retain their residential zoning.
  - The lands are not adjoining the draft LAP settlement boundary.
  - The proposal to zone the lands for residential does not accord with the key housing and zoning principles set out in Chapter 4 of the CDP, including the application of the 'sequential approach' to zoning/designation of new lands whereby 'leapfrogging' to peripheral lands is to be resisted. The sequential approach as set out in the DOE/Planning's Development Plan and Local Area Plan Guideline specifies that "zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and on public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands and that any exception must be clearly justified in the written statement of the development plan." The lands are not now and were not in the previous plans contiguous to zoned housing areas.
- Contrary to what is stated, lands have not been zoned in Coolboy 'at the expense' of these lands. Given the 'low density' requirement of the previous zoning, the maximum estimate yield of these lands was in the order of 50 units. Even if this zoning had been continued, there would still have been a shortfall of 170 units that had to be made up for by new zoning in this plan. Furthermore the designation of lands at Coolboy is in accordance with the required 'sequential approach'.
- The proposal is not in accordance with principles of proper planning and sustainable development and it is not recommended.

**Chief Executive's Recommendation**

No change

<b>Submission Number</b>	<b>B13</b>	<b>Name</b>	<b>Edmund Holfeld /Avoca River Park Ltd</b>
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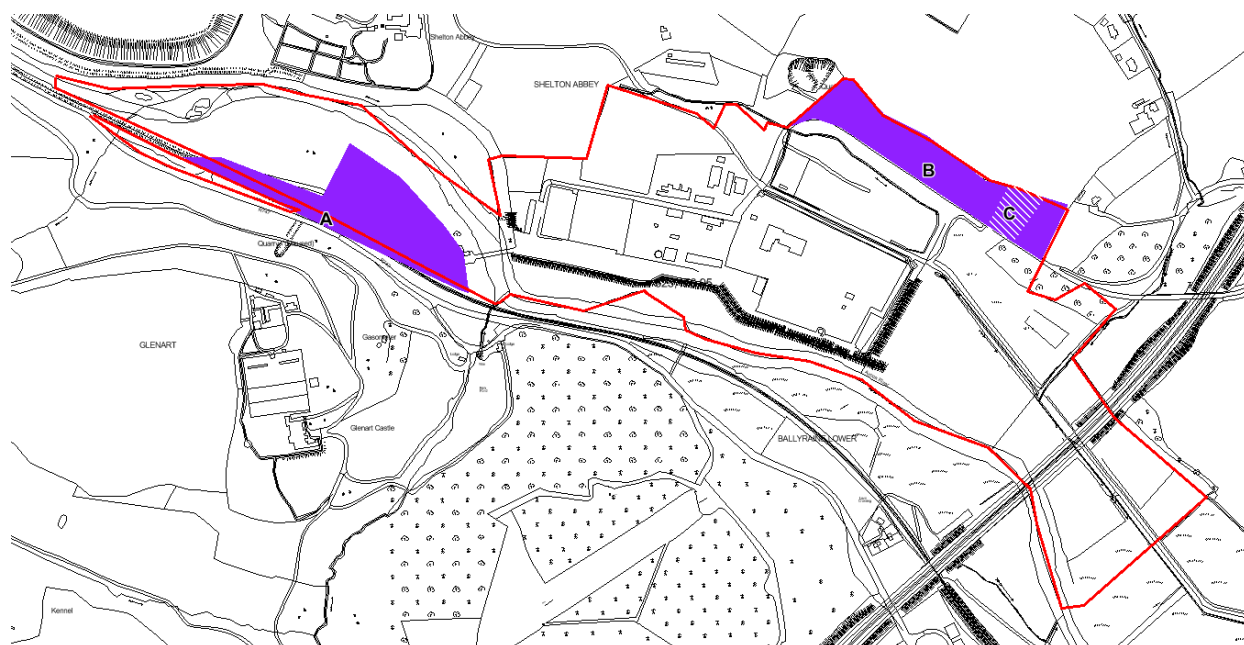
**Summary of Issues Raised**

The submitter is the owner of lands situated to the west of the settlement at Shelton (within red line boundary), the former IFI facility.

The submitter draws attention to two particular parcels within the landholding as follows (marked in purple on map below):

**A:** To the west of the river which provides an important link from the overall site to the railway line and public road to the west. It is set out that there is no flood issue on these lands.

**B:** These lands have had planning permission granted (PRR07/2118 -marked 'C') and therefore should be accordingly zoned employment.



The submission sets out the following information and requests:

1. Lands marked 'A' should be reinstated within the settlement boundary and zoned 'employment'.
2. Lands marked 'B' should be zoned employment with the settlement boundary amended to include these lands.

**Opinion of Chief Executive**

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.

It is important to note that:

- (a) The employment growth target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- (b) Based on this employment growth target, an appropriate amount of land has been zoned for employment to meet the requirements of the target population;
- (c) Enough land has been zoned in the plan to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom';

(d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development.

- The plots of land at A or B are currently not in active use.
- Both sites are on the periphery of the plan area and to zone them and include it within the settlement boundary would extend the plan further west into the rural area.
- Arklow has more than adequate amount of zoned employment zoned land, both brownfield and greenfield, to accommodate its employment needs for the lifetime of the plan and beyond.
- This entire purple area of site A is also within the Flood zone A and B of the OPW's PFRA's.
- The proposal is not in accordance with principles of proper planning and sustainable development and it is not recommended.

With respect the lands marked A:

This parcel of land was zoned 'E' in the previous development plan on the grounds that it formed part of the former IFI site. It appeared that these lands were previously used for goods storage as the lands are adjoining the railway line, which was used to transport chemicals / fertilisers by train when the IFI plant was in operation. The lands are linked to the main industrial site to the east by a road bridge;

- In reality however the area that was used for industrial activity was much narrower than the zoning provided in the 2011 plan and the active area during IFI times comprised only a corridor along the railway and its sidings and the remainder of the land was not use for industrial purposes and was vegetated;
- It is therefore apparent that the previous zoning had little justification in terms of the historical use of the lands;
- Flood Studies carried out by the OPW (PFRA's) also show these lands at high risk of flooding (Flood Zone A 1:100)
- In this context, it is not recommended that the zoning be altered; any lack of 'zoning' will not prevent the historical established / permitted use of the lands from continuing, but would potentially limit the intensification of use or construction of new buildings, both of which are not supported due to the flood risk attached to the land and indeed the general impact on the landscape and rural aspect of this valley.

With respect to B:

These lands, other than Site C, have not previously been zoned. Site C was zoned in 2011 in recognition of a permission that had been granted on same in 2008 on unzoned lands. The permission is still valid and there is no need to zone the land in order for this permission to be taken up

**Chief Executive's Recommendation**

No change

Submission Number	B14	Name	Colette Hopper
<b>Summary of Issues Raised</b>			
The submitter is a resident of Arklow. She is frustrated by the lack of development as she considers there is so much potential. She suggests that there is a lack of action, information and communication. The submitter outlines a number of issues including:			
<b>(a) The River</b>			
The raw sewerage affects the quality of the beaches, causes rat infestation and health issues. No one was held accountable for the river pollution. There are no future plans to remove the silt build up in the river.			
<b>(b) Harbour/Tourism</b>			
The lands around the harbour should be developed for tourism, it has such potential. Boat visitors would bring spin off's to shops and restaurants. Fishing should be brought back as it brings spin off's for markets and			



restaurants. The harbour could be developed for families, at the moment there is the smell of dog food, dog faeces and trucks. Glenart Castle should be given to the people; the Chinese have no interest in its upkeep. Arklow was not mentioned in Credon's Epic East or Wicklow Tourism brochure.

**(c) Industry**

All industrial estates should be moved to the back of Arklow in an industrial estate with good access to the M11. Bring back Arklow Pottery and coffee shop. The Roadstone mine is an eyesore and it is questionable how it was let there in the first place. Large trucks are going through residential areas causing damage to houses.

**(d) Town centre**

Arklow needs a theatre for its musical and acting talent, maybe at the Alps site. Boland's should be turned into a shopping centre. Those who own property in the town and are holding out should be punished. Rates should be reduced. Keep the town authentic.

**(e) Community**

Provide facilities for addicts.

**Opinion of Chief Executive**

**(a)** The lack of the provision of the waste water treatment plant (WWTP) is outside the remit of a land-use plan and is a matter for Irish Water. The LAP fully facilitates the provision of the WWTP, with objective **IT1** "*To support and facilitate the development of a waste water treatment plant in Arklow, at an optimal location following detailed technical and environmental assessment and public consultation*". The removal of silt from the river is not a matter for a land-use plan but this concern will be passed onto the Environment Section who are working with the OPW on the flood defence scheme.

**(b)** The Waterfront zoning facilitates the development of tourism uses, Chapter 5 on Key Areas – Arklow Waterfront acknowledges the tourism and recreational potential of the area however the delivery of such uses is outside the remit of a land-use plan.

**(c)** The locations of the zoned employment lands are considered appropriate and in line with proper planning. Bringing back Arklow Pottery is outside the remit of a LAP.

The quarry to the south of the town has been in operation for over a century, commencing operations prior to the need to seek planning permission for such uses. Currently with the lack of an appropriate alternative route to access the Quarry, it is necessary for large trucks to use the roads in built up areas. When the proposed Southern Port Access Road is constructed this will alleviate this problem. The traffic management of the trucks is not within the remit of a Local Area Plan however this concern will be passed on to the Municipal District and the Road Section.

**(d)** The town centre zoning fully facilitates the development of a theatre and a shopping centre at these locations. The delivery of a theatre and shopping centre in the town centre is outside the remit of a land-use plan.

Rates are not a matter for a land-use plan.

Legislation has been brought in 2015 to levy landowners in Town Centre's whose sites are vacant or underutilised in order to facilitate appropriate development on the site. However it is important to note that the implementation of this legislation in Arklow is somewhat limited as there is limited infrastructure (no Waste Water Treatment Plant) in the settlement to permit development of these vacant/underutilised sites.

**(e)** The provision of services for addicts is not a matter for a land-use plan.

**Chief Executive's Recommendation**

No change

Submission Number	B15	Name	Deirdre Joyce and Deborah Veale (nee Meehan)
<b>Summary of Issues Raised</b>			
<p>The submitters are former residents of Arklow and outline a number of issues including;</p>			
<p><b>(a) Waterfront Zone Permitted Uses:</b></p>			
<p>The draft LAP does not provide sufficient clarity about what the vision is for this area. The submitters have suggested what they consider to be more appropriate uses, for example restrict this area for uses such as health and wellbeing, amenity, leisure, tourism, water sports, maritime and industry linked to amenity, leisure, tourism and complementary retail and new innovative IT as a priority. New residential development should be considered secondary and only when complementary to the primary amenity / recreation/ tourism and innovation enterprise uses.</p> <p>The submitters have suggested that a number of uses be removed as permitted development in the Waterfront zone.</p> <p>It is also suggested in the submission that the area zoned AOS should be extended to include coverage of the whole of the WZ area and along the river bank on the south side. The Council should consider the development of new path and cycle ways and recreational infrastructure within this area. In addition the Council should consider providing access points to the river.</p>			
<p><b>(b) New zone for Arklow Pottery site and environs</b></p>			
<p>It is suggested in the submission that the Council provide a specific zoning category for the former pottery site as a location for the design, manufacturing and showcasing of Irish ceramic products and appropriate to consider this site as a location for showcasing Irish design more generally or perhaps showcasing Irish food.</p>			
<p><b>(c) Masterplan for Waterfront Area</b></p>			
<p>The submitter suggests that the Waterfront Area requires its own Action Area Plan or Masterplan</p>			
<p><b>(d) Natural and Build heritage Asset Assessment – Cultural Ecosystem Services</b></p>			
<p>It is highlighted in the submission that the use of 'Ecosystem Services Approaches' to public consultation to inform Green Infrastructure planning be carried out. It is suggested that the natural heritage potential of Arklow should be examined and developed in order to support the amenity elements of the plan. In particular it is suggested that the wording for zone OS2 should be changed to make reference to 'Green Infrastructure' as an overall descriptor for the following assets: "undeveloped lands that comprise flood plains, buffer zones along EU and nationally protected sites (Natura 2000 sites, NHAs etc), watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity" (p.52).</p>			
<p><b>(e) Health and wellbeing</b></p>			
<p>The submission suggests that emphasis should be placed within the plan on the need to support and enhance the health and wellbeing of the residents of Arklow. Council should indicate within the plan proposals to address walkability and cycling options within Arklow and environs by means of the provision of pathways ('greenways') and cycle routes, as well as options to reduce car based travel to and from the retail Bridgewater retail hub.</p>			
<p><b>(f) Rejuvenation of the retail core</b></p>			
<p>The submitters are suggesting that the Council undertake an evaluation to ascertain how to rejuvenate retail activity within the town centre as it exists now before development of the Alps and other sites and in particular to investigate a proposal for the development of short term retail activity including innovative 'pop up' retail, exhibition and enterprise units within the existing core.</p>			
<p><b>(g) Public realm at key entry points to the town</b></p>			

It is suggested that the council carry out some road improvements into the town from the north and at the roundabout at the junction to Arklow bridge from the north.

**(h) Tourism potential**

It is suggested that the Council undertake a 'Public Participation GIS' of the Arklow's built and natural heritage.

**(i) Age Friendly Towns**

The submitters suggest that the plan should be proofed for children, the elderly and those with disabilities.

**(j) Climate Change Mitigation**

It is suggested that the Council include a statement on climate change within the plan and outline proposals to increase carbon sequestration opportunities by means of Green Infrastructure planning and planting of appropriate native trees and shrubs.

**Opinion of Chief Executive**

**(a)** It is considered that the description and objectives contained within the plan for the Waterfront Zone clearly set out the vision for the area. It is also considered that the range and type of use allowed for in the plan would facilitate the type of activities desired by the submitters. It is not considered appropriate to restrict residential development in this area; on the contrary it is considered this should be encouraged to breathe new life and activity into the area. With regard to extending the 'AOS' zoning into the waterfront zone, this would negate the redevelopment of the area, as such a zone is not open space and sport use only and is therefore not supported. With regard to footpaths and cycleways and improved access to the waterfront area, this is an objective of the plan.

**(b)** It is not considered appropriate to designate land that is for economic activity and employment creation, for one industry only (ceramics / pottery), particularly when there is no indication that that industry is viable or desirous of establishing in this location. Should any particular industry, including pottery / ceramic sector wish to (re)establish in Arklow, there are ample buildings and sites available at suitably permitted and zoned location in the TC and E zones.

**(c)** It is considered that the objectives for the WZ are sufficient clear and it is not considered that a 'secondary' layer of planning, in the form of a masterplan is required at this time.

**(d)** This LAP is subsidiary to the Wicklow County Development Plan, which set out a range of policies and objectives with regard to Green Infrastructure, and these apply directly in Arklow. As part of this plan Green Infrastructure Resources have been mapped (Map No. 10.1) and the development strategy and associated zonings and objectives of this plan have taken into account the protection of GI assets where necessary, the linking up of corridors, and the designation of open spaces to enhance the network. It is a stated objective of the Draft Plan **HT8**- *To facilitate the development and enhancement of green infrastructure resources, including access to, connectivity between areas of interest and linkages between green spaces including the coast, where feasible within Arklow and environs settlement boundary (see Map No. 10.1).*

**(e)** As noted in the draft Plan there are no cycle lanes within Arklow town centre due to lack of width and existence of on-street car parking; cycle lanes from the town centre's environs into the core area are limited and not continuous. There are cycle parking facilities within the town at a number of convenient locations, but significant enhancement of such facilities is required. The draft Plan also highlights that public footpaths in the town are narrow, impeded by signage, bins, lights and other items and in general are not inclusive to all users. It is an objective of the plan to address these deficiencies (Objectives IT11, VP5 and TR4). As detailed above, the plan includes Objective HT8 with respect to greenways.

**(f)** As noted in Chapter 5 of the Draft Plan, the primary focus of the 'Town Centre Strategy' is the reinvigoration of the main street and a link between the town centre and the waterfront. For the purpose of

this land use plan, the strategy for the Main Street comprises;

- Vehicular access and movement
- Pedestrian access and movement
- Cyclist access and movement
- Car Parking
- Enhancing access to public transport
- Enhancing the public realm
- Redevelopment of derelict and vacant sites
- The importance of buildings, items and places of heritage value
- Mix of uses in the retail core area
- Retail role of the core area.

The Council, is working hard to implement these objectives already, for example through the following projects:

- The establishment of a 'town team' – this group includes a number of committees of local people, elected representatives and Council officials, committed to the improvement of the town. Important projects in train include: (a) security improvements in the town, including erection of CCTV, (b) marketing and promotional activities, including the production of a promotion video and website / online profile development (c) launching of public survey to establish the issues facing residents and seeking suggestions for improvements in the town, (d) development of a digital notice board for the town, (e) numerous heritage and public realm projects including improvements to the parade ground, public realm / street furniture improvements (cognisant of need of the elderly, (f) investigations into accessibility improvement, (g) working with businesses and retailer in conjunction with retail excellence Ireland to make the town more retail friendly; there is a strong desire to make Arklow Wicklow's next 'age friendly' town. It should be noted also that 5 new shops have opened in Arklow in the last 2 months.
- The development of the new council offices and library on the Main Street, rather than on some peripheral greenfield site, to reflect the Council's commitment and desire to draw activity back into the centre; approx 2,000 people use the library every week.
- The resurfacing of the Main Street and implementation of a flower basket scheme – all in an effort to make the town centre more attractive;
- Ongoing investigations into the implementation of the Derelict Sites Act and the Vacant Sites Levy, as well as use of planning enforcement mechanisms, to try to address dereliction, vacancy and inappropriate / unauthorised works and uses

**(g)** The plan sets out a number of objectives with regard to the improvement of the 'public realm' including HT4, HT7, OP1, OP2 and will continue to enhance the public realm through ongoing works and programmes (some described above).

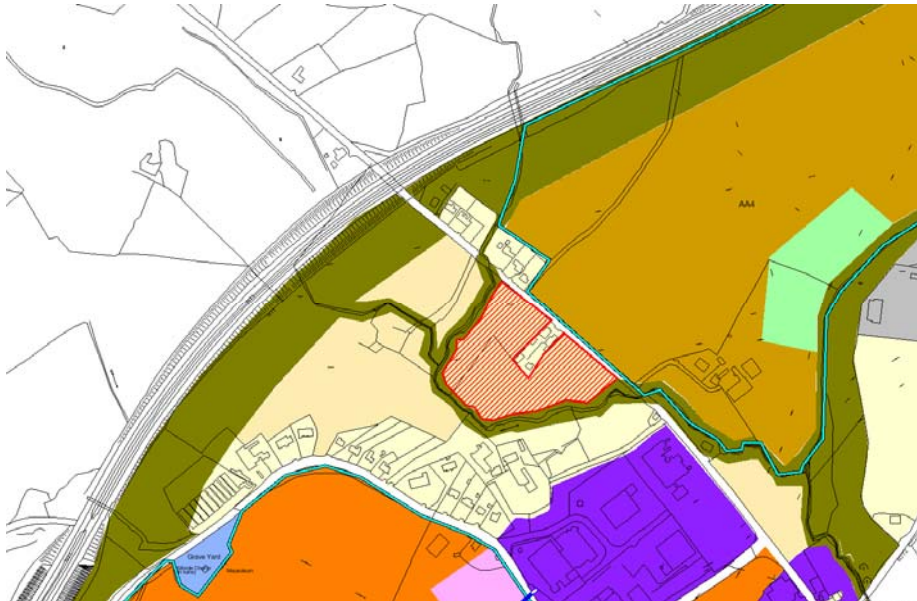
**(h)** The issues raised in the submission are noted. Built and natural heritage, as well as Tourism are all addressed in the plan.

**(i)** Every effort is made to proof the objectives of the plan with respect to impacts on the elderly and children and to provide a land use framework that would allow for the delivery of improved services and facilities to all in society. There is a programme already underway to have Arklow designated an 'Age Friendly Town'.

**(j)** This plan is subsidiary to the Wicklow County Development Plan which set out in detail the Council's objectives with regard to climate change and green infrastructure.

#### Chief Executive's Recommendation

No change

<b>Submission Number</b>	<b>B16</b>	<b>Name</b>	<b>Alan, Michael &amp; Robert Kennedy</b>
<b>Summary of Issues Raised</b>			
<p>This submission relates to lands at Coolboy. The submitters indicate that they do not wish to have their land zoned, bar the 6 acre plot (2.4ha) shown in red hatching on the map below.</p>			
			
<b>Opinion of Chief Executive</b>			
<p>While they have not submitted a map of the entire holding, the submitters according to the land registry own an overall holding of c. 13.5ha / 33 acres in this area, generally bounded by Beech Road, Kilbride Lane and the M11. These lands were all unzoned and outside of the plan boundary in the previous development plans. It is proposed in the draft plan to zone some of this area, between Beech Road, Kilbride lane and the M11 as 'RE – existing residential' and some 'OS2' which is the '100m' set back from the M11. The RE zoning is recommended in recognition of the substantial part of this area that is already occupied by residences and to allow for infill residential development, in an area that is considered a logical expansion zone for the settlement, contiguous to the existing built up area.</p>			
<b>Chief Executive's Recommendation</b>			
No change			

<b>Submission Number</b>	<b>B17</b>	<b>Name</b>	<b>Jonathon O'Toole</b>
<b>Summary of Issues Raised</b>			
<p>The submitter notes the objectives in the plan to enhance the public realm. However he considers that these objectives are not being implemented in the works being carried out by the Council and has submitted examples of locations where hard landscaping, erection of railings, footpath construction etc have not been carried out to a high standard.</p> <p>It is suggested that a public realm strategy should be developed, which provides guidance on specific design elements and details and develops a consistent material palette to create a coherent image for the town centre, and requiring an exceptionally high standard of implementation. (Westport town is provided as a good case example)</p>			
<b>Opinion of Chief Executive</b>			
This submission has highlighted a number of important issues mainly to do with the works carried out in the			

public realm around Arklow and the lack of consistency with materials and design of works carried out in the public realm. Albeit the draft LAP seeks a high quality public realm, the carrying out of such works or the management of the carrying out of such works in the public realm is a matter for the Municipal District team and this submission has been drawn to their attention.

The issue of the development of a public realm strategy is noted and should Arklow MD / WCC prepare such a strategy, there may be merit in referring to it in a LAP and/or including it in the LAP. This will be considered should a strategy be prepared/ adopted.

**Chief Executive's Recommendation**

No change

<b>Submission Number</b>	<b>B18</b>	<b>Name</b>	<b>Mamie and Sean Quirke</b>
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**Summary of Issues Raised**

The submitter is the owner of lands situated to the north of the town in Action Area 3 (within red line boundary) at 1 Carrigmore, Arklow. The lands are currently in use as part of the garden attached to their dwelling.



They are seeking that the lands are excluded from the AAP and zoned RE.

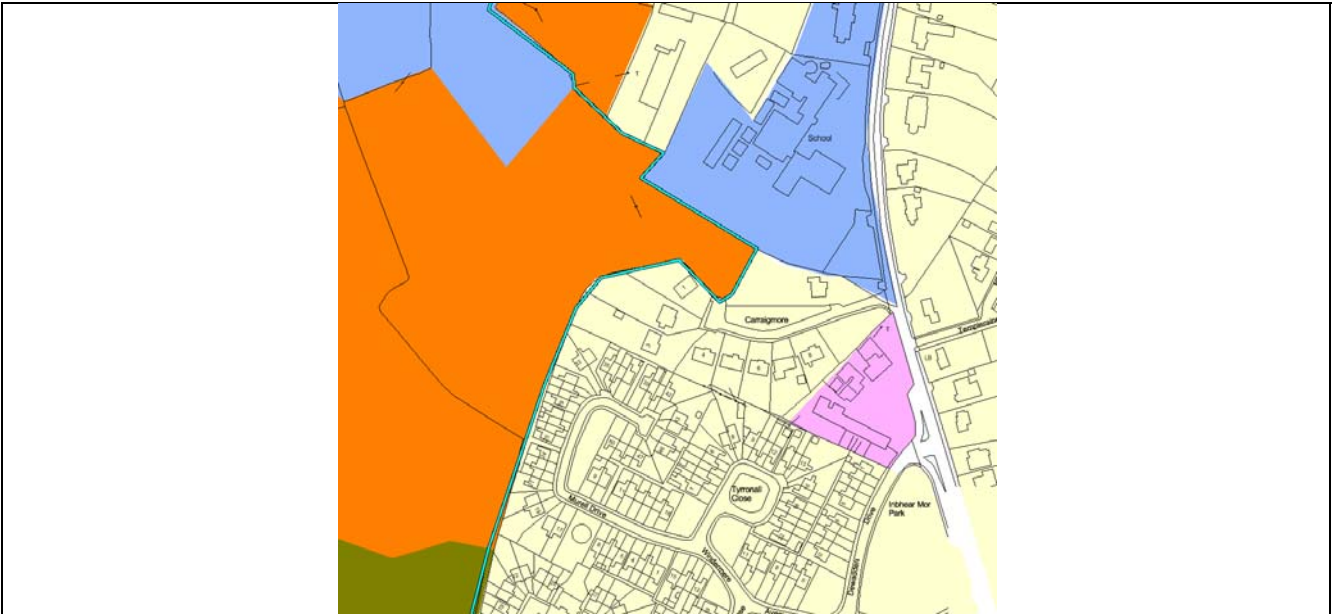
**Opinion of Chief Executive**

It is noted that these lands form part of the side garden of the adjoining dwelling and given the small scale of land involved the CE has no objection to these lands being omitted from the Action Area and zoned RE.

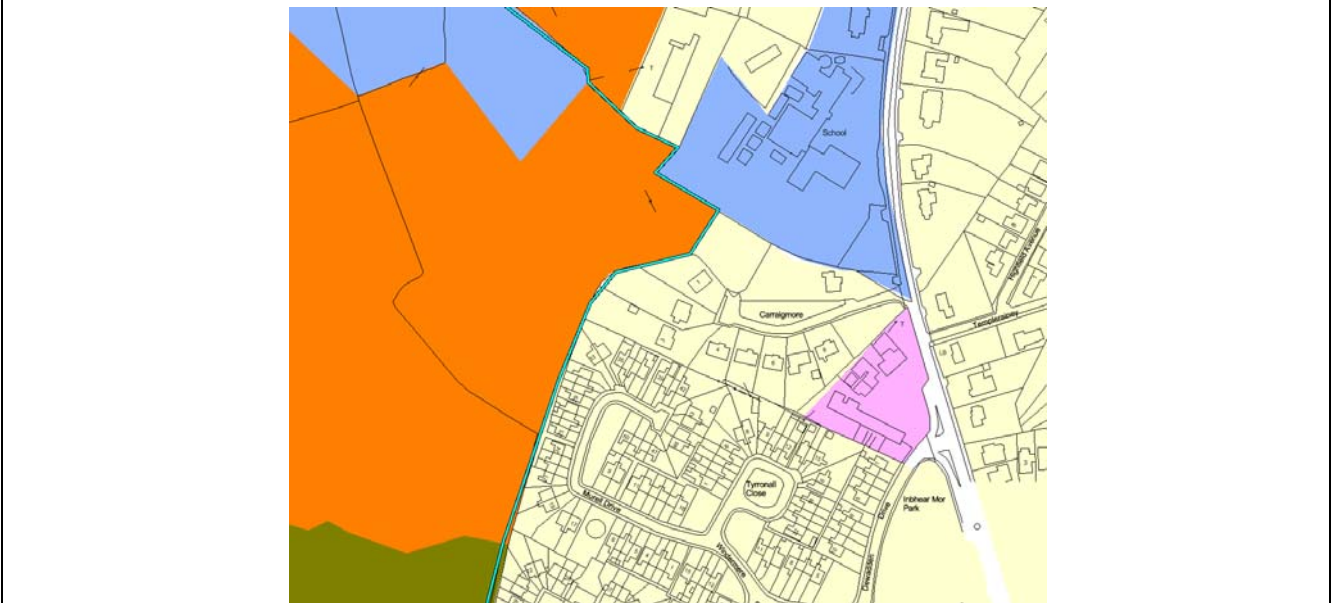
**Chief Executive's Recommendation**

It is recommended to change the zoning and Action Area Plan boundary and any other changes consequent from:





To:



Submission Number	<b>B19</b>	Name	<b>Rappel Enterprises Ltd</b>
<b>Summary of Issues Raised</b>			
<p>The submitter is the owner of 1.01ha lands situated to the west of the settlement at Shelton. 0.6ha was included in the 2011 Plan and zoned employment (shown here within red hatched boundary). It is pointed out that planning permission was granted under PRR07/2118 (extended for 5 years under PRR13/8823) for an industrial unit.</p>			





**Opinion of Chief Executive (see also response to B13)**

The zonings of the draft plan are consistent with the County Core Strategy, as set out in the Wicklow County Development Plan.

It is important to note that:

- (a) The employment target for the settlement must be consistent with the CDP and RPG and there is no scope for deviation from this;
- (b) Based on this employment growth target, an appropriate amount of land has been zoned for employment to meet the requirements of the target population;
- (c) Enough land has been zoned in the plan to meet the target for 2023 (the lifetime of the plan) plus an additional 5 years beyond the life of the plan up to 2028 to provide for a long term planning strategy and zoning 'headroom';
- (d) In accordance with the guidelines from the DoE (Development Plan Guidelines / Core Strategy guidelines) the most appropriate lands have been selected for development.

The planning permission PRR07/118 (extended for 5 years under PRR13/8823) is still valid and there is no need to zone the land in order for this permission to be taken up.

The rezoning of these lands from 'Unzoned' to 'Employment' would increase the employment development potential within the settlement and would therefore be considered not consistent with the Regional and County Strategy.

It is on the periphery of the plan area and to zone it and include it within the settlement boundary would extend the plan further west into the rural area. Arklow has more than adequate amount of zoned employment zoned land, both brownfield and greenfield, to accommodate its employment needs for the lifetime of the plan and beyond.

The proposal is not in accordance with principles of proper planning and sustainable development and it is not recommended.

**Chief Executive's Recommendation**

No change

Submission Number	B20	Name	Roadstone Ltd
<b>Summary of Issues Raised</b>			
Roadstone Limited is the owner of Arklow Quarry. Arklow Quarry is a strategic asset, providing construction materials to Arklow, the region and nationally. It has also exported aggregates through its jetty facility. Charles Stewart Parnell bought Arklow Quarry in 1885 with up to 200 people employed then to produce hand-dressed "setts" used to pave streets in Dublin, Liverpool and many other towns.			
The submitter puts a number of issues forward;			

**(a)** The submitter outlines the importance of the extractive industries to the wider economy and the need to protect the operations of working quarries with reference to the RPG's and their acknowledgement of the importance of extractive industries, which acknowledging the potential for conflict in the operation of these industries with wider environmental considerations. The RPG's acknowledge the role of the planning system to regulate, promote or control the exploitation of natural resources taking into account these other issues.

They acknowledge the Strategic Objective of the Wicklow County Development Plan 20 "To support and facilitate the exploitation of County Wicklow's natural aggregate resources in a manner, which does not unduly impinge on the environmental quality, and the visual and residential amenity of an area."

**(b)** The submission outlines how the extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland, all of which is heavily dependent on the supply of crushed stone, concrete and other building materials made from aggregates. Aggregates are a key resource and are of great importance to the economy and society. Well managed and designed quarry sites minimise effects on the environment, heritage and the landscape. There is also the potential for habitat creation through the restoration of quarry sites following the cessation of operations. Planning policies should be carefully constructed to avoid adverse effects on aggregate resources and the related extractive industries and added-value production that are essential for our built environment, infrastructure and future economic development.

**(c)** Arklow Quarry is a strategically important asset. The rock resource at Arklow Quarry has particular and rare characteristics that are of critical importance to various types of infrastructure development supplying railway ballast, PSV (polished stone value) aggregate for surfacing roads and rock armour for coastal defence systems.

**(d)** The jetty facility operated by Roadstone at the quarry is a strategic transportation resource. The jetty has been used to supply materials to the UK and Ireland, without the need for HGV transport or unnecessary handling.

**(e)** Objective IT9 should be amended as follows (suggested new text in red):

**IT9** *To facilitate the construction of a Southern Port Access Road (SPAR) linking the Wexford Road to the Action Areas at Tinahask, the Roadstone Quarry and the Waterfront Zone, incorporating a link to form a primary distributor route for HGV traffic to the existing port. The design of the road including its alignment and boundary treatment will be carried out in such a manner as to ensure minimal impact on Arklow Golf Club and the Roadstone Quarry. Possible future connections of the SPAR to the Clogga Road (at Kish / Rock Big) may also be considered.*

Roadstone recognises the benefits of providing a new access from the port area to the national road network and of reducing the number of HGVs that travel through the town centre. However, Map No. 1 of the draft LAP shows the proposed road as passing along the current Roadstone access route and through the northern part of the Roadstone landholding. The current Roadstone access route is a private road; it is not a public road.

Given that Arklow Quarry is an acknowledged and strategic economic asset within the draft LAP, it is considered that policy IT9 should also seek to minimise the impacts of the proposed road on the quarry. The road layout as shown has the potential to sever part of the Roadstone landholding from the main body of the site, thus reducing the operational capacity of the landholding and requiring the reorganisation of the quarry layout. There are also no clear proposals for maintaining access to Arklow Quarry.

**(f)** Objective OS2 should be amended as follows:

*To protect and enhance existing open, undeveloped lands. Description: To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along EU and nationally protected sites (Natura*

2000 sites, NHAs etc), watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity, *but not including access roads and other previously developed or required infrastructure within this zoning.*

The access route to Arklow Quarry is zoned OS2. It is presumed that the purpose of this zoning is to protect the area between the Arklow Quarry access road and the coast from development. It should be noted, however, that the access road is not undeveloped land and that the LAP seems to provide for the SPAR along the Roadstone access road.

**(g)** Given the importance of value added production at quarries generally and at Arklow Quarry in particular, it is considered that The typical uses in relation to extractive industry zoning text should be amended as follows: *Uses include extractive industry uses (The winning of all minerals and substances in or under land of a kind ordinarily worked by underground or open cast mining) and ancillary developments, including value added production, such as concrete, asphalt and block production.*

**(h)** The following bullet point should be added to the criteria of AA2:

*The south-eastern boundary of AA2 adjoins the long-established and operational Roadstone Quarry. Any proposed development in the vicinity of the quarry should not impact on the ongoing quarry operations and associated value-added production facilities.*

AA2 is located west of the golf course and Arklow Quarry. The delivery of the SPAR is contingent on the development of these lands. Map No.1 of the draft LAP provides for residential development adjoining the Roadstone landholding. It should be noted that the quarry is permitted, operational and established since the 19th century. AA2 does not address the interaction of the existing quarry and the proposed residential development. It is considered that any proposed development should not impinge on the existing and established operations at Arklow Quarry.

It is proposed, therefore, that the proposed zoning within AA2 is revised so that the area of E1 employment zoning to the west of AA2 is exchanged with the proposed residential R28 and R20 zoning. This would create a buffer between Arklow Quarry and any proposed residential development without reducing the extent of the proposed employment or residential areas.

**(i)** The extractive industry provides essential building materials for all types of built development and infrastructure. Extraction can only take place where resources occur and it is, therefore, tied to certain locations. The LAP should continue to recognise the strategic importance of Arklow Quarry. It is important to ensure that the future interpretation of LAP policies does not prevent the secure, long-term supply of construction aggregates and value-added products and that proposed development in the vicinity of Arklow Quarry does not inhibit established quarry operations and associated value added production facilities. Through this submission, Roadstone requests that the considerations set out in this submission are incorporated into the LAP.

#### Opinion of Chief Executive

**(a)** Noted.

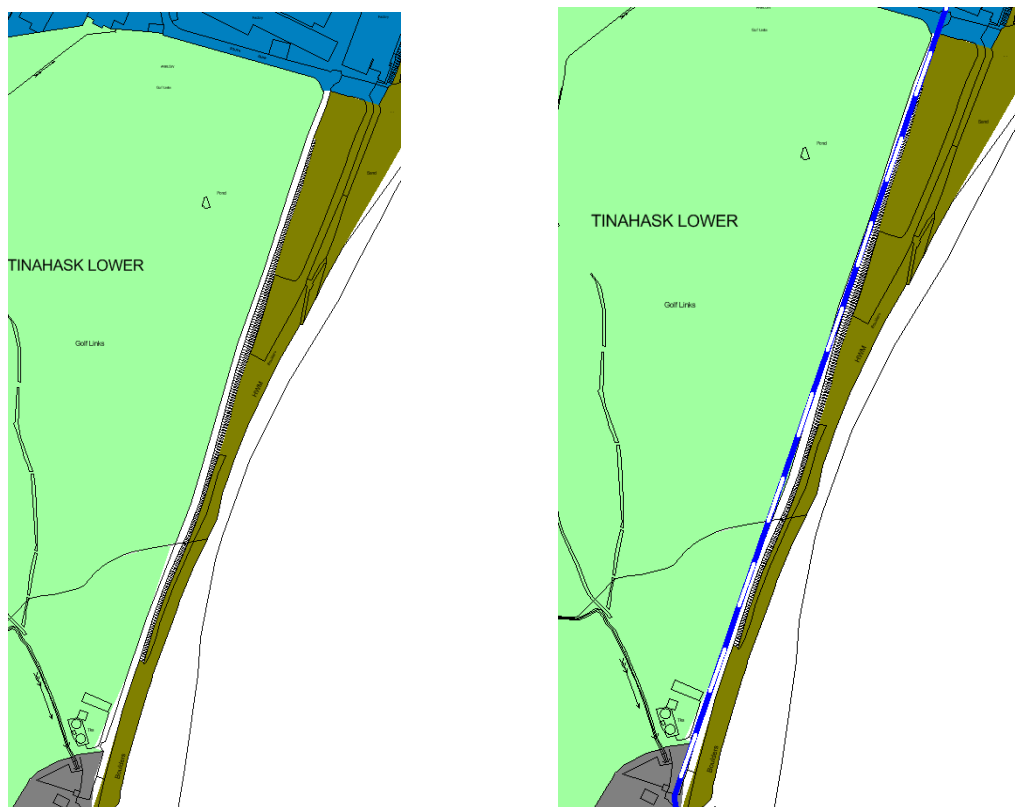
**(b)** Noted.

**(c)** Noted.

**(d)** Noted.

**(e)** The suggestion is considered reasonable and it is recommended to amend the text as suggested.

**(f)** The Roadstone access road is not zoned, given the large scale zoom level of the map and the location of the indicative SPAR route it is hard to see the access road. No change is recommended. See map below.



(g) The suggestion is considered reasonable and it is recommended to amend the text as suggested.

(h) Albeit the Land Use Zoning map shows the R28 lands alongside the Quarry, these lands are within Action Area 2. The draft LAP clearly sets out that "Action Area Plans (AAP) have been identified in the plan where necessary. Action Area Plans are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the Action Area during the plan period. Separate applications for sections of each Action Area will not be considered until an overall Action Area Plan has been agreed in writing with the Planning Authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area. **The position, location and size of the land use zonings shown on plan map are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out for the Action Areas.** The total quantum of development in each use type set out for each action area will however require to comply with the criteria set out for that action area, as should phasing proposals where relevant."

Any development of these lands will be the subject of a planning application with all adjacent land uses and the impact on such land uses taken into consideration in assessing the planning applications. Therefore it is not recommended to amend the proposal as the specific uses of the lands will be set out as part of the AAP agreement, with a planning application to follow.

(i) No change to the plan is recommended in light of this point; it is not considered necessary to highlight the strategic importance of a private commercial asset in the plan area

#### Chief Executive's Recommendation

Amend the plan as follows:

#### 1. Chapter 9

**Infrastructure, Transportation & Movement Objectives**

**IT9** To facilitate the construction of a Southern Port Access Road (SPAR) linking the Wexford Road to the Action Areas at Tinahask, the Roadstone Quarry and the Waterfront Zone, incorporating a link to form a primary distributor route for HGV traffic to the existing port. The design of the road including its alignment and boundary treatment will be carried out in such a manner as to ensure minimal impact on Arklow Golf Club and the Roadstone Quarry. Possible future connections of the SPAR to the Clogga Road (at Kish / Rock Big) may also be considered.

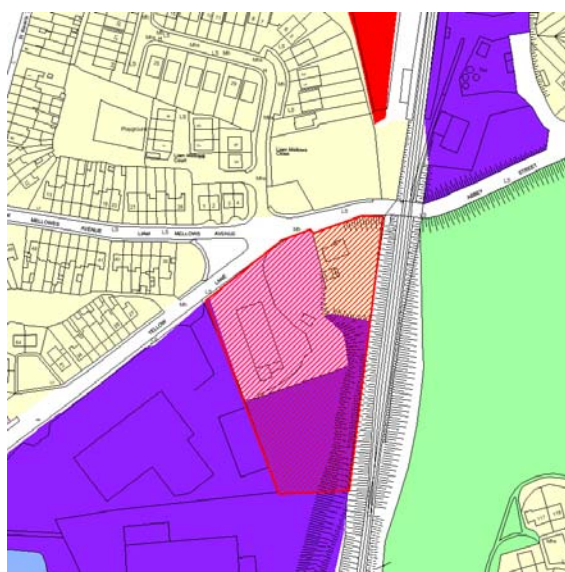
**2. Chapter 11**

**Extractive industry (EX – U)** - Uses include extractive industry uses (The winning of all minerals and substances in or under land of a kind ordinarily worked by underground or open cast mining) and ancillary developments, including value added production, such as concrete, asphalt and block production.

<b>Submission Number</b>	<b>B21</b>	<b>Name</b>	<b>Yellow Lane Business Park Ltd</b>
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**Summary of Issues Raised**

The submission is requesting that the lands identified on the map below be rezoned from a combination of residential, neighbourhood services and employment uses to an appropriate zoning for mixed use / convenience retail purposes.



The submission details the rationale for a commercial / convenience retail development of the subject site, noting the shortage of town centre lands capable of development, the proximity of convenience retail multiples and the site's edge of centre location.

It is the opinion of the submitter that the subject site be zoned Town Centre similar to lands zoned town centre in Ferrybank and the Super Valu premises which is not contiguous with the existing town centre.

As an alternative a mixed use zoning is suggested as appropriate, whilst not contiguous with the town centre it is in very close proximity to same. A mixed use zoning objective could provide a framework for identifying the site as being potentially appropriate for edge of centre uses, subject to detailed consideration at planning application stage.

It is further submitted that a revised / broadened Local Shops and Services objective may provide a framework for the development of the overall site. The proposed revised arrangement would acknowledge same whilst

retaining considerable control over the potential development of LSS lands, where they are at an edge of centre location, whilst other more remote / removed LSS sites would be entirely unaffected. The submitter suggests the following revised wording-

<b>LSS: LOCAL SHOPS &amp; SERVICES</b>	To provide for small scale local neighbourhood <del>and / or edge of town centre</del> shops and services	To facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment; <del>and / or, where located within the edge of town centre to facilitate medium to large scale retailing and local services in accordance with the sequential approach; subject to</del> <del>and are not being</del> <del>not</del> of such a scale or type that would <del>materially</del> detract or draw trade from lands designated town centre.
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### Opinion of Chief Executive

The lands in question has 3 distinct zonings for the following reasons:

Existing Residential (RE) – these lands are occupied by an existing residence, which is not in the same ownership as the parts zoned Local Shops and Services (LSS) / Employment (E1). It is not clear if the owner of the house has any relationship with 'Yellow Lane Business Park Ltd'

The remainder of the site was used in the 1970s as a waste landfill site, with harbour dredgings having been deposited there. In the late 1970s permission was granted for the erection of an office and workshop for 'Nobel and Stevens', a vehicle components and car repair business. This at that time was granted as a 'material contravention' to the development plan, being an 'industrial use'. In the 2005 Town Development Plan, the lands were zoned 'commercial'.

In the review of the 2005 plan, the zoning was amended to part 'LSS' and part 'E' as the 'commercial' zoning was considered too vague. The LSS zoning only related to the front of the site i.e. that part that had been developed in the 1970s, while the remainder of the site that was retained in undeveloped vegetated condition was zoned 'E'. The remainder of the site was zoned 'E' to reflect the desired land use for this plot – for employment generating development, consistent with the use of the adjoining lands.

The 'Nobel and Stevens' operation ceased trading a number of years ago; however around 2014 the site was gradually brought back into active use first by the development of a car wash in the yard area and subsequently bringing the original workshop and shop back into use as a car service centre and dance studio. The necessary planning permission for said uses was subsequently secured in 2016.

This site is not considered suitable for the requested 'town centre' / significant convenience retail use given the proximity of the lands to the Wexford Road, where there is ample shopping available as well as potential for retail redevelopment. To consider significant retail development on this site would imply 'leapfrogging' of more suitable retail lands / sites in the town centre and along the Wexford Road, which would be contrary to sustaining the vibrancy and vitality of the core retail area. Therefore the suggested rezoning of the land to 'town centre' or 'mixed' use is not recommended.

However, it is considered that it would be logical to apply the 'local shops and services' (LSS) designation to the entire site, as it is acknowledged that the proposed 'employment' zoning on the southern part of the site is not essential to the achievement of the overall employment objectives of the plan and further, these lands are not linked physically to the employment lands adjacent and therefore a minor amendment is recommended. It is also proposed to pull back the zoning to the bottom of the railway buffer.



It is considered that the 'local shops and services' (LSS) designation would provide for a range of redevelopment opportunities and uses, including retail, but would allow for appropriate management of the scale of any retail / commercial element to be commensurate with the location of the site outside of the core retail area. The suggested revised definition of 'LSS' is not considered appropriate as again this would effectively undermine the retail strategy and sequential approach to retailing.

**Chief Executive's Recommendation**

Amend map as follows:

Change from: Employment 'E1' to Local Shops and Service 'LSS'



Change to:



<b>Submission Number</b>	<b>B22</b>	<b>Name</b>	<b>Allen and Marian Young</b>
<b>Summary of Issues Raised</b>			
The submitters are the owners of a house on the Avoca / Beech Road, Arklow adjacent to the bypass in the townland of Coolboy. Their house and garden has now been included within the revised boundaries of the			



draft 2017 plan. The house and garden are proposed zoned open space whilst the adjoining properties are zoned RE.

They are seeking that the house and gardens should be zoned, existing residential, RE within the new plan as the adjoining properties.



**Opinion of Chief Executive**

It is noted from the submission that there is an existing dwelling here, therefore it is proposed to rezone the land around the exiting dwelling to RE from OS2.

**Chief Executive's Recommendation**

It is recommended to rezone the lands here from OS2 to RE  
From:



To:

