

Number	Organisation	Agent / Rep
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

Number	Surname	First Name	Agent/Rep
B1	Arklow & District Chamber		
B2	Arklow Active Retirement		Anne O'Connell
B3	Arklow Heritage/Nature Walks Development Company Limited		
B4	Arklow Positive Ageing		Maria Neary
B5	Arklow Shipping		Joe Nelson
B6	Balfe	Myles	Catherine Mara
B7	Bermingham	Danny & Shane	John L. O'Hanlon & Associates
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	
B13	Holfeld /Avoca River Park Ltd	Edmund	PD Lane Associates
B14	Hopper	Colette	
B15	Joyce & Veale (nee Meehan)	Deirdre, 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.

A1

Leonora Earls

From: Ciara Gilgunn - (DECLG) [Ciara.Gilgunn@housing.gov.ie]
Sent: 18 August 2017 12:43
To: Planning - Plan Review
Cc: Stewart Logan - (DECLG); Colin Ryan - (DECLG); Maude NiBhrolchain; Ruth Murray - (DECLG)
Subject: DHPLG Submission on the Draft Arklow and Environs Local Area Plan 2017
Attachments: DHPLG Submission to LA 18 August 2017.pdf; ATT00001.txt; ATT00002.htm

To Whom It May Concern,

Please find attached submission from the Department of Housing, Planning & Local Government on the Draft Arklow and Environs Local Area Plan 2017.

I would be very grateful for confirmation of receipt of the attached submission.

Kind Regards

Ciara

Ciara Gilgunn
Forward Planning Section

Planning & Housing Market Policy and Land Management Division | Department of Housing, Planning and Local Government | Custom House | Dublin 1 | +353 (0) 1 8882418



Seirbhís ar scoth an domhain a chur ar fáil don Stát agus do mhuintir na hÉireann.



An Roinn Tithíochta, Pleanála
agus Rialtais Áitiúil
Department of Housing, Planning
and Local Government



18 August, 2017

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

Re: Draft Arklow and Environs Local Area Plan 2017

A Chara,

I am directed by the Minister for Housing and Urban Development to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

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.

Housing Allocation and Core Strategy

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.

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.

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:

- A current baseline population figure for Arklow incorporating additional released data from the CSO on Census 2016
- A housing unit target for the plan period (i.e. to 2023)

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.

Additional text and policy changes may be necessary elsewhere within the draft plan in association with the above changes.

Infrastructure and Development Phasing

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 *'adequate infrastructure is vital for the facilitation of future development of Arklow'*. 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.

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 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.

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.

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.

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.

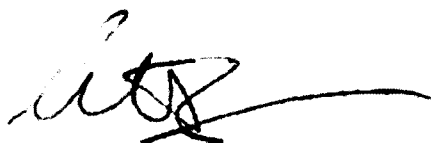
The Council is requested to address the specific issues highlighted above in the Material Alterations stage of the statutory LAP process in order to ensure that the Arklow and

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.

The officials of the Department are available to discuss the matters raised above and in the first instance you are advised to contact Mr. Stewart Logan, Planning Adviser on 01-8882419.

Is mise le meas,

A handwritten signature in black ink, appearing to be 'Colin Ryan', with a long horizontal line extending to the right.

Colin Ryan
Senior Advisor
Forward Planning Section

Lisa Rothwell

From: David Clements [David.Clements@nationaltransport.ie]
Sent: 18 August 2017 16:56
To: Planning - Plan Review
Subject: Draft Arklow Local Area Plan
Attachments: NTA Submission - Draft Arklow and Environs Local Area Plan.pdf

Dear Sir / Madam,

Please find attached the NTA's submission on the Draft Arklow Local Area Plan. Can you please confirm receipt of this submission at your earliest convenience.

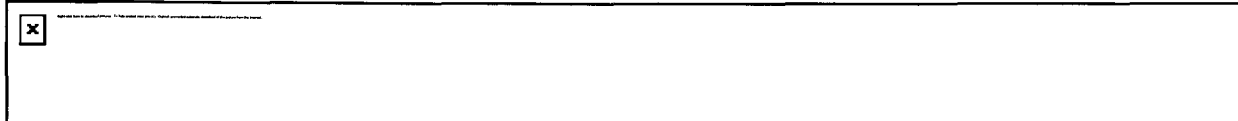
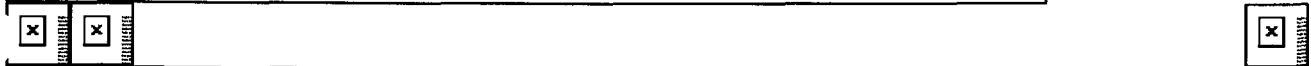
Kind regards,

David Clements
Land Use & Transport Planner
Transport Planning and Capital Investment



Dún Scéine
Iveagh Court
Harcourt Lane
Dublin 2

Tel: + 353 (0)1 879 8305
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Tá eolas sa teachtaireacht leictreonach seo a d'fhéadfadh bheith príobháideach nó faoi rún agus b'fhéidir go mbeadh ábhar rúnda nó pribhléideach ann. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le haghaidh an duine/na ndaoine sin amháin atá an t-eolas. Tá cosc ar rochtain don teachtaireacht leictreonach seo do aon duine eile. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo agus b'fhéidir d'fhéadfadh bheith mídhleathach.

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A2



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Administrative Officer,
Planning Department,
Wicklow County Council,
Wicklow Town.

18th August 2017,

RE: Arklow and Environs Local Area Plan

Dear Sir/Madam,

The National Transport Authority (the "NTA") has reviewed the Draft Local Area Plan and makes the following recommendations:

1. Arklow Town Centre

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.

As such, and in the context of proposals to significantly expand the orbital road network in Arklow, Objective VP1, which seeks to "maintain the Main Street as the principal vehicular route through the town centre" does not fully align with the principles of the Transport Strategy for the Greater Dublin Area (the "Transport Strategy"), in particular section 5.8.2 which states that it is intended to "develop orbital roads around town centres accompanied by and facilitating enhanced public transport, cycling and pedestrian facilities in the relevant centre". 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.

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.

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.

2. 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.

3. 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.

4. 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.


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 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.
- It is also 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.

I trust that the views of the Authority will be taken into account in the finalisation of the Arklow Local Area Plan.

Yours sincerely,



Michael MacAree
Head of Planning and Data Analysis

Leonora Earls

From: Doireann NiCheallaigh [doireann.nicheallaigh@antaisce.org]
Sent: 09 August 2017 15:25
To: Planning - Plan Review
Subject: Draft Arklow Local Area Plan
Attachments: 20170809-27-ALAP.pdf



Dear Sir/Madam,

Please find attached a submission from An Taisce in relation to the draft Arklow Local Area Plan.

Yours faithfully,

Doireann Ni Cheallaigh

--
An Taisce - The National Trust for Ireland | www.antaisce.org
The Tailors' Hall, Back Lane, Dublin 8, Ireland
Company Reg. No. 12469 | Charity Ref. No. CHY4741 | Charity Regulator No. 20006358
An Taisce is a membership-based charity
Join at www.antaisce.org/membership



An Taisce
The National Trust for Ireland

20170809-27-ALAP

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town
Co. Wickow

Sent by email to:
Planreview@wicklowcoco.ie

09.08.17

Re: Draft Arklow Local Area Plan 2017

Dear Sir/Madam,

An Taisce welcomes the opportunity to submit comments on the Draft Arklow Local Area Plan 2017.

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1.0 New Residential Zonings

An Taisce acknowledge the need for substantial residential development in Arklow in accordance with the housing provisions in the Wicklow County Development Plan 2016-2022. A significant portion of the new residential zonings are to the north of the town, however, focus should be placed on higher density residential development further south near the town centre and the train station. This is recommended by the Sustainable Urban Residential Guidelines as it will increase the social and economic vitality of the town centre, improve access to public transportation, and help reduce reliance on private car travel.

The development of zoned / designated land should generally be phased in accordance with the sequential approach. Developing closer to the centre and the station aligns with the Wicklow County Development Plan (Chapter 4 – Housing) which states that, "*Development shall extend outwards from centres with undeveloped land closest to the centres and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted.*" (Section 4.3.3)

Focusing higher density development closer to the centre will also direct development away from more sensitive greenfield sites such as Coolboy (Action Area 4). The Strategic Environmental Assessment (SEA) report determined that development on the Coolboy site is likely to have negative environmental impacts, and parts of the Coolboy are also within high and moderate flood risk zones.

2.0 Infrastructural Capacity

One of the key messages of the 'Local Area Plans, Guidelines for Planning Authorities' (2013) is that a LAP must identify the mechanisms that will secure the implementation of the necessary physical, social and environmental infrastructure required to achieve the objectives of the plan. Given the extensive zoning outlined in the LAP, the town's infrastructural capacity in the areas of both transport and water treatment must be addressed.

2.1 Transport Within the Town

An Taisce note that there is no detailed plan or timeline to improve access between the northern and southern portions of the town despite the large residential and commercial zonings proposed (AA3 & AA4). It is noted under Action Area 3 (AA3) the facilitation of a possible future third Avoca river crossing. Little detail is provided in relation to the feasibility and facilitation of this infrastructure.

When making decisions to zone land, regard must be had to the existing and future availability of, or the capacity to provide, infrastructure. Where services

are not available, there should be a reasonable expectation of their being provided in the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure, within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development. (DoECLG, 2007).

The LAP should be guided by the existing essential social infrastructure (schools, community facilities) and physical (transport, water services, communications) infrastructure, including the realistic prospects for addressing capacity constraints. Planning Authorities must engage with the providers of essential physical and social infrastructure and ensure that LAPs are based on realistic assessments as to the funding and timing of such infrastructure recognising that some levels of strategic infrastructure may take a number of cycles to provide. (DoECLG, 2013)

The 2013 Guidelines strongly advises that LAPs should include an Implementation and Infrastructure Delivery Schedule, which would require a planning authority to work closely with all relevant departments, agencies and stakeholders involved in securing the delivery of the formulation, adoption, implementation, and monitoring of the policies and objectives of the LAP.

In relation to the road infrastructure in Arklow, it is noted that movement between the northern and southern sections rely on the two-lane 19 Arches Bridge over the Avoca River. The extent of the proposed residential and commercial development to the north, in the absence of plans to improve connectivity and infrastructural capacity as well as the town's pedestrian and cycle networks (see section 4) is likely to greatly increase traffic on the bridge and exacerbate congestion in the town centre area.

An Taisce consider the quantum of zoned land to the north to accommodate c.1720 units (combining AA3 & AA4) with a range of densities and unit sizes is premature without addressing the transport infrastructure requirement beforehand. Moreover, without improved transport infrastructure in the town, the N11 could experience significantly increased congestion (See section 2.2).

It does not appear Traffic and Transport Assessment was conducted to evaluate the likely impacts of the various proposed developments on traffic volumes and flow in the town. Until such an assessment is carried out, planning for such extensive residential and commercial development is premature.

2.2 Motorway and Junction Capacity

The scale of the new residential and commercial zonings in the LAP area have the potential to generate significant amounts of traffic on the N11, hamper its function as a strategic transport corridor, and exacerbate car dependency. Moreover, there is a lack of passive transport planning in the LAP which would contribute to reducing traffic (see section 4).

The cumulative traffic impacts of the planned developments in the LAP area could substantially contribute to congestion at the two junctions that serve the town, 20 and 21. Therefore, the planning authority should have regard to the Spatial Planning and National Roads guidelines which state in Section 2.7 on Development at National Road Interchanges or Junctions that '*planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road.*'

The 'Spatial Planning and National Roads, Guidelines for Planning Authorities' (2012) outlines that planning authorities must exercise particular care in their assessment of development/local area plan proposals relating to the development objectives and/or zoning of locations at or close to interchanges where such development could generate significant additional traffic with potential to impact on the national road. Accordingly, in preparing development and local area plans, planning authorities must assess the trip generation aspects of any land use zoning objectives and how such trip generation is to be catered for, promoting the use of sustainable modes, while protecting the strategic function of the national roads network. An Taisce consider the lack of a Traffic and Transport Assessment to determine the likely impacts on N11 traffic would render the zonings premature.

2.3 Wastewater Treatment

At present, Arklow has no wastewater treatment system, and all sewage is discharged directly into the Avoca River. The EU Urban Wastewater Treatment Directive (91/271/EEC) requires that cities and towns collect and treat urban wastewater rather than discharging it untreated into waterbodies. 38 cities/towns/settlements in Ireland, including Arklow, were found to be in breach of the Directive, and notice was issued in 2013. A further warning was issued in 2015, and the case has now been referred to the European Court of Justice.

Irish Water is in the process of planning a wastewater treatment plant for Arklow, the application for which will be submitted to An Bord Pleanála in 2017. Even if approved, there will be a significant time lag before the plant is operational. As of 2016, Irish Water and the EPA (*Urban Wastewater Treatment in 2015*) estimated that Arklow will not be able to treat water until at least 2020. Without an operational water treatment plant, An Taisce submit that the development of such significant residential and commercial areas as proposed in the LAP could be problematic, presenting a risk to human health and polluting freshwater and marine environments.

The increase in the amount of effluent entering the Avoca River would further pollute the river and the estuary into which it flows. Moreover, it 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."*

3.0 Sequential Industrial Development

An Taisce submit that industrial zoning in Arklow should adhere to the sequential approach, particularly with regard to the Shelton Abbey development. The sequential approach as set out in the Development Plan Guidelines (DoEHLG, 2007) specifies that zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands.

It is acknowledged that the Shelton Abbey location is a brownfield site with some existing services from previous industrial uses. However, development of this area for employment/industrial purposes constitutes leapfrog development and sets an undesirable precedent for unsustainable sprawl to the west of the N11. The plan does not include provisions for public or passive transport access to the site, thereby promoting reliance on car-based travel. Therefore, it also has the potential to exacerbate traffic congestion on the N11 and contribute to the cumulative traffic impacts of the extensive developments in Arklow town.

An Taisce consider that any development at the Shelton Abbey location should be carried out in a phased approach whereby other more appropriately located industrial zoning are given development priority.

4.0 Passive Transport

The Smarter Travel Framework 2009, the National Climate Change Strategy 2012, and other related policies all emphasise the need for a modal shift from private car use towards public transportation and passive transport (walking and cycling) in Ireland. All forward planning must have regard to the objectives of Smarter Travel: A New Transport Policy for Ireland 2009 – 2020, which are listed in Chapter 3 as follows:

- 1. Future population employment growths will predominantly take place in sustainable compact forms which reduces the need to travel for employment and services;*

2. *500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%;*
3. *Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work;*
4. *The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels;*
5. *A reduction will be achieved on the 2005 figure for Greenhouse gas emissions from the transport sector.*

The draft LAP broadly discusses the lack of adequate cycling facilities in the town and the need for development of safe and accessible pedestrian and cycle routes. However, with a few exceptions, the LAP is deficient in outlining specific plans to improve passive transport. This is especially the case in regards to cycling infrastructure. The lack of specific plans allows for excessive flexibility and could result in long delays in planning processes and/or the provision of inadequate facilities.

An Taisce acknowledge the difficulty in creating cycling infrastructure in certain areas of the town centre due to the narrow width of the streets. However, 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.

There are a number of existing national guidance and policy documents that can assist with the planning of Arklow's passive transport network. The Design Manual for Urban Roads and Streets provides comprehensive guidance on road design and details the differences in appropriate cycling facilities based on road size, the volume and speed of traffic, etc. (see section 4.3, and especially section 4.3.5).¹ This manual also contains information on effective street design for pedestrian use. The Rural Cycle Scheme Design document also provides in-depth guidance on the types, layout, placement, and design of cycling infrastructure.² Further information can be found in the National Cycle Policy Framework and the National Cycle manual.³

5.0 Climate Change

Section 15 of the Climate Action and Low Carbon Development Act 2015 requires that all public bodies shall, in the exercise of their functions, have

¹ Design Manual for Urban Roads and Streets:

<http://www.dttas.ie/corporate/publications/english/design-manual-urban-roads-and-streets>

² Rural Cycle Scheme Design: <http://www.tiipublications.ie/library/DN-GEO-03047-01.pdf>

³ National Cycle Policy Framework: <http://www.smartertravel.ie/content/national-cycle-policy>;

National Cycle Manual: <https://www.cyclemanual.ie/>

regard to *'the objective of mitigating greenhouse gas emissions and adapting to the effects of Climate Change in the State.'*

An Taisce consider that the draft LAP lacks clear policies and objectives in relation to climate change. 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. Ireland needs a coordinated effort if it is to meet its 2020 obligations under European law for emissions reduction, energy efficiency, and renewable energy use. Therefore, each local authority must play a strong role in implementing GHG mitigation measures in their areas.

5.1 Climate Change and Flood Risk

The SEA report notes that climate change projections indicate future increases in the frequency and intensity of storms and extreme rainfall events in Ireland. This will have ramifications for areas, such as Arklow, that are at risk of flooding: *"Taking the projected precipitation changes into account, there will be the potential for a significant increase in the number of extreme discharge events and a slight increase in their intensity, leading to an increased probability of flooding in the future."* Similarly, sea level rise as a result of climate change will increase the risk of coastal flooding in Arklow. In their current forms, the LAP and accompanying Strategic Flood Risk Assessment do not include provisions for these increased risks, which should be taken into account in both the assessments and the proposed mitigation measures.

The OPW's Guidelines for Planning Authorities on the Planning System and Flood Risk Management prescribe the following: *"A precautionary approach should be applied, where necessary, to reflect uncertainties in flooding datasets and risk assessment techniques and the ability to predict the future climate and performance of existing flood defenses. Development should be designed with careful consideration to possible future changes in flood risk, including the effects of climate change and / or coastal erosion so that future occupants are not subject to unacceptable risks."* The LAP should also include provisions for the inclusion of SUDS (sustainable urban drainage systems) as part of the flood mitigation plans.

An Taisce requests your consideration of the above comments and would welcome further discussion/notification of the making of the Arklow Local Area Plan.

Yours faithfully,

Doireann Ni Cheallaigh

Planning Officer

An Taisce – The National Trust for Ireland

Leonora Earls

From: Kelly, Veronica [Veronica_Kelly@education.gov.ie]
Sent: 18 August 2017 14:15
To: Planning - Plan Review
Cc: Carolan, George
Subject: Draft Arklow and Environs LAP 2017
Attachments: Sub_Draft_Arklow_&_Environs_LAP_2017_Aug17.docx

Administrative Officer, Planning Section.

Attached please find the submission from the Department of Education and Skills to the draft plan referred to above.

Veronica Kelly
Forward Planning Section
Department of Education and Skills
Portlaoise Road
Tullamore
Co. Offaly
R35 Y2N5

Ph: 057 932 4448
Email: Veronica_Kelly@education.gov.ie

From: Catherine McDonald [mailto:CMcDonal@wicklowcoco.ie]
Sent: 04 July 2017 16:20
To: Cregg, Mary <mary_cregg@education.gov.ie>; Power, Brian <Brian_Power@education.gov.ie>; Lyons, Fidelma <fidelma_Lyons@education.gov.ie>
Subject:

DRAFT ARKLOW AND ENVIRONS LOCAL AREA PLAN 2017 - PUBLIC CONSULTATION

Dear Sir or Madam,

Pursuant to Section 20 of the Planning and Development Act 2000 (as amended), from 5th July 2017 please log onto the following link to view the public notice and the draft Arklow and Environs LAP 2017 (Main document, maps and 3 appendices) <http://www.wicklow.ie/local-area-plans-town-plans>.

SUBMISSIONS ARE INVITED on the plan and associated document before **18th August 2017** (5pm). Submissions may be made by either **Writing to:** Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town or **Emailing to:** planreview@wicklowcoco.ie

A **PUBLIC INFORMATION DAY** will be held in Arklow Municipal District Office, Castle Park, on **Thursday JULY 20TH 2017** from 14.00PM – 16.00PM and 17.30PM TO 19.00PM where planning staff will be available to assist you in making a submission.

Yours sincerely

Administrative Officer
 Planning Section
 Wicklow County Council
 Station Road
 Wicklow Town

18 August 2017

Re: Draft Arklow & Environs Local Area Plan 2017

Dear Sir/Madam

Thank you for your email of 4 July 2017 in relation to the above.

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.

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

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.

However, the draft plan also provides information in relation to housing targets to 2028 in Table 2.2, page 8.

	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	9,838	+4,379
2028	23,000		+5,726

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

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.

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, 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.

Yours sincerely

Veronica Kelly
Executive Officer
Forward Planning Section

Tel. No: 057-9324448
Email: Veronica_Kelly@education.gov.ie

Appendix 1

Information used to calculate educational infrastructural requirements

Based on the projected population growth included in the draft Plan, the Department calculates the extent of primary and post primary provision needed in an area to cater for this additional population as follows:

- 12% of the population at any given time is of primary school going age.
- 8.5% of the population at any given time is of post primary school going age.
- At primary level, school accommodation is calculated on the basis of a Pupil Teacher Ratio of 27:1, meaning each individual classroom in a school will have 27 pupils.
- New primary school buildings are generally provided in multiples of 8 classrooms. This is because there are eight individual class groupings between junior infants and 6th class. A 16 classroom school would mean that there are 2 junior infant classes, 2 senior infant classes, with a 24 classroom school having 3 junior infant classes.
- A new primary school ranging in size from 4 - 8 classrooms, as a guide, requires 0.77 hectares (1.9 acres).
- A new school ranging in size from 8 - 16 classrooms, as a guide, requires 1.14 hectares (2.8 acres).
- A new school ranging in size from 16 - 24 classrooms, as a guide, requires 1.6 hectares (4 acres).
- A new school ranging in size from 24 - 32 classrooms, as a guide, requires 2.2 hectares (5.47 acres).
- At post primary level, the Department refers to the size of a building by the number of pupils it will cater for because the number of pupils, together with the curriculum to be delivered (which is school specific), will dictate the range and extent of specialist facilities to be provided.
- Generally, the maximum size of new post-primary school the Department will build, is for 1,000 pupil places.
- 4.57 hectares (12 acres approximately), as a guide, are required for a new 1,000 pupil post primary school.

Appendix 2

Site Suitability

This Department has published two documents that provide guidance in relation to site suitability for educational provision. Technical Guidance Document - 025 – Identification and Suitability Assessment of Sites for Primary Schools & Technical Guidance Document - 027 – Identification and Suitability Assessment of Sites for Post Primary Schools. Both of these documents are available, for download, from this Department's website www.education.ie.

Your attention is also drawn to the Department of Environment, Community and Local Government guidelines titled "**Sustainable Residential Development in Urban Areas**" published in May 2009 which provides that no significant residential development should take place without an assessment on the impact of school provision (refer to Chapter 4: Page 25). Please refer to Department of Environment, Community and Local Government website www.environ.ie.

In addition, the Department of Education and Skills draws your attention to the published (July 2008) Code of Practice for Planning Authorities and the provision of schools, in particular Item 2 and the need for consulting with this Department regarding the assessment of specific sites. This document is available on both the Department of Education and Skills and Department of Environment, Community and Local Government websites.

Furthermore, following on from the publication of the Code of Practice in 2008, a Memorandum of Understanding between the Department of Education and Skills and the City & County Managers' Association on the acquisition of sites for school planning purposes is in place. This Memorandum of Understanding is designed to codify practice in relation to cooperation between this Department and local authorities in relation to the acquisition of sites suitable for the construction and development of buildings for educational purposes.

In relation to additional educational needs identified for this plan, subject to the availability of resources and on foot of a formal request to the CEO of your local authority, it would be this Department's intention to request, at the appropriate time, that Wicklow County Council would assist this Department in relation to the identification/acquisition of suitable school sites as required.

The Memorandum of Understanding document is available, for download, from this Department's website www.education.ie.

Appendix 3

The Department's current programme of capital investment in schools includes the following projects, which are due to go to construction over the course of the plan.

Projects going to construction

6 Year Programme Projects to go to construction 2018			
County	Roll Number	School Name & Address	School Type
Wicklow	76106S	Gaelcholáiste na Mara, Arklow	Post-Primary
6 Year Programme Projects to go to construction 2019 - 2021			
County	Roll Number	School Name & Address	School Type
Wicklow	61770U	Arklow CBS	Post-Primary

Leonora Earls

From: Cian O'Mahony [c.omahony@epa.ie]
Sent: 18 August 2017 13:46
To: Planning - Plan Review
Subject: EPA Submission - Draft Arklow and Environs LAP 2017 and SEA ER
Attachments: SCP161002.2 EPA Submission ArklowEnvironsLAP-Cover.pdf

Re. Draft Arklow and Environs Local Area Plan 2017 and Strategic Environmental Assessment Environmental Report

Dear Ms McDonald,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 4th July 2017, regarding the above. Please find attached the EPA's submission in relation to the Draft Arklow and Environs Local Area Plan (the Plan) and SEA Environmental Report (the SEA ER).

This submission is intended to promote full and transparent integration of environmental considerations in the Plan and the integration of the Plan-making and SEA processes.

Specific Comments on the Plan

We acknowledge that the Plan includes many objectives for protecting environmental sensitivities within the Plan area. It is also evident that the issues identified in the SEA have been incorporated into the Plan, which is welcomed.

Action Areas

The SEA has identified that the potential for likely significant effects is greater in the action areas, given the proposed development on greenfield lands. There is merit in considering the preparation of environmental management plan(s) for these areas. These environmental management plans could coordinate the development of the action areas, and consider aspects such as traffic management, waste management, green infrastructure integration/protection/provision, surface water management/drainage, noise etc.

We note that certain new zoned lands proposed for development have been identified as being within flood risk zones A and B. The Plan 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).

Critical Service Infrastructure

The development of the plan area should be closely linked to the ability to service such developments with adequate and appropriate critical service infrastructure.

Relationship with Key Plans/Programmes

There is merit in recognising that the National Mitigation Plan has been published, and the Regional Spatial and Economic Strategies are being prepared. You should consider including a commitment to integrate these (and the National Planning Framework) as relevant and appropriate to the plan area upon their adoption.

In addition to the above, the Draft River Basin Management Plan for Ireland (DHPCLG, 2017), once finalised and adopted, should also be integrated in the context of ensuring the protection and improvement of water quality status within the Plan area.

Specific Comments on the SEA ER

In *Chapter 8 – Mitigation and Monitoring*, we note the mitigation measures described in *Table 8.1 – Mitigation Measures*, to address the potential adverse effects identified in the SEA ER.

In relation to the monitoring programme described in *Section 8.2*, 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.

Future Amendments to the Draft Plan

Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan.

SEA Statement – “Information on the Decision”

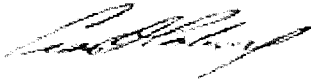
Following adoption of the Plan, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned. I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely



Cian O'Mahony
Scientific Officer
SEA Section
Office of Evidence and Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra,
County Cork

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The opinions contained within are personal to the sender and do not necessarily reflect the policy of the Environmental Protection Agency.



Environmental Protection Agency
An Gníomhaireacht um Chaomhú Comhshaoil

Regional Inspectorate,
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LoCall: 1890 33 55 99

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

18th August 2017

Our Ref: SCP161002.2

Re. Draft Arklow and Environs Local Area Plan 2017 and Strategic Environmental Assessment Environmental Report

Dear Ms McDonald,

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Should you have any queries or require further information in relation to the above please contact the undersigned. I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely

Cian O'Mahony
Scientific Officer
SEA Section
Office of Evidence and Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

Lisa Rothwell

From: Matthew Collins [mattcoll@water.ie]
Sent: 18 August 2017 15:20
To: Planning - Plan Review
Subject: Arklow LAP
Attachments: Scanned Document.pdf

SCANNED

Please find attached Irish Water's submission to the Arklow LAP

Kind Regards,

Matthew Collins

Spatial Planning
Asset Sustainability, Policy and Innovation
Irish Water
Colvill House
Talbot St.
Dublin 1

Email: mattcoll@water.ie
Tel: +353 1 8925738



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Thank you for your attention.

Tá an fhaisnéis á seachadadh dírithe ar an duine nó ar an eintiteas chuig a bhfuil sí seolta amháin agus féadfar ábhar faoi rún, faoi phribhléid nó ábhar atá íogair ó thaobh tráchtála de a bheith mar chuid de. Tá aon athsheachadadh nó scaipeadh den fhaisnéis, aon athbhreithniú ar nó aon úsáid eile a bhaint as, nó aon ghníomh a dhéantar ag brath ar an bhfaisnéis seo ag daoine nó ag eintitis nach dóibh siúd an fhaisnéis seo, toirimisceithe agus féadfar é a bheith neamhdhleathach. Níl Líonraí Uisce Éireann faoi dhliteanas maidir le seachadadh iomlán agus ceart na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Ní ghlacann Líonraí Uisce Éireann le haon dliteanas faoi ghnímh nó faoi iarmhairtí bunaithe ar úsáid thoirmiscithe na faisnéise seo. Níl Líonraí Uisce Éireann faoi dhliteanas maidir le seachadadh ceart agus iomlán na faisnéise sa chumarsáid seo nó maidir le haon mhoill a bhaineann léi. Má fuair tú an teachtaireacht seo in earráid, más é do thoil é, déan teagmháil leis an seoltóir agus scríos an t-ábhar ó gach aon ríomhaire. Féadfar ríomhphost a bheith soghabhálach i leith truaillithe, idircheaptha agus i leith leasaithe neamhúdaráithe. Ní ghlacann Líonraí Uisce Éireann le haon fhreagracht as athruithe nó as idircheapadh a rinneadh ar an ríomhphost seo i ndiaidh é a sheoladh nó as aon dochar do chórais na bhfaighteoírí déanta ag an teachtaireacht seo nó ag a ceangaltáin. Más é do thoil é, tabhair faoi deara chomh maith go bhféadfar monatóireacht a dhéanamh ar theachtaireachtaí chuig nó ó Líonraí Uisce Éireann chun comhlíonadh le polasaithe agus le caighdeáin Líonraí Uisce Éireann a chinntiú agus chun ár ngnó a chosaint. Fochuideachta gníomhaíochta de chuid Ervia is ea Uisce Éireann atá faoi theorainn scaireanna, de bhun fhorálacha an tAcht um Sheirbhísí Uisce 2013, a bhfuil a bpríomh ionad gnó ag 24-26 Teach Colvill, Sráid na Talbóide, BÁC 1.

Go raibh maith agat as d'aird a thabhairt.



Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

Uisce Éireann
Bosca OP 6000
Baile Átha Cliath 1
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Irish Water
PO Box 6000
Dublin 1
Ireland

18/08/2017

T: +353 1 89 25000
F: +353 1 89 25001
www.water.ie

Re: Draft Arklow LAP 2017

Dear Sir / Madam,

Irish Water acknowledges receipt of your letter and welcomes the opportunity to review the Draft Arklow Local Area Plan 2017. We have been assessing the availability of Water Services in Arklow and have the following observations:

Water Services

As acknowledged in the Draft Arklow LAP, 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.18000pe.

Wastewater Services

As acknowledged in the Draft Arklow LAP, untreated wastewater is currently discharged into the Avoca River that runs directly through Arklow Town. Irish Water intends to develop a Wastewater Treatment Plant, and a preferred site at the Old Wallboard Factory, North Quay, Ferrybank has been identified. Irish Water is currently preparing an Environmental Impact Statement and progressing the preparation of a planning application for the new 36,000pe WwTP and associated infrastructure.

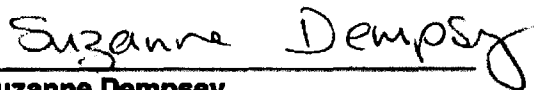
Irish Water welcomes the strategies, policies and objectives included in the Draft Arklow LAP 2017 that provide policy support for the proposed Wastewater Treatment Plant, in particular:

- **Section 2.2 OVERALL DEVELOPMENT STRATEGY FOR ARKLOW INFRASTRUCTURE STRATEGY FOR ARKLOW**
'To facilitate Irish Water in the provision of necessary waste water infrastructure, in a sustainable manner'.
- **CHAPTER 9: INFRASTRUCTURE, TRANSPORTATION & MOVEMENT**
Infrastructure, transportation & movement objectives -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.'
- **Land use zoning objectives, including:**
WZ: WATERFRONT: 'To facilitate the provision of high quality new residential and to facilitate the provision of a new Waste Water Treatment Plant with an appropriate high

quality architectural design/appearance' and the inclusion of a waste water treatment plant in the uses that will be considered permissible in the WZ zoning.

Irish Water is available to discuss this submission with the Council and any other issues with respect to the provision of water services within our remit.

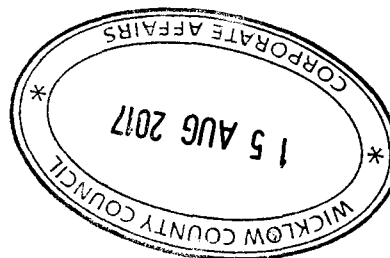
Yours Sincerely,



Suzanne Dempsey
Spatial Planning Strategy Specialist



Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow



Dáta | Date
14 August, 2017

Ár dTag | Our Ref.
TII17-98240

Bhur dTag | Your Ref.

Re: **Draft Arklow & Environs Local Area Plan, 2017 - 2023**

Dear Sir/Madam,

TII welcomes referral of the Draft Arklow & 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 of for the Councils considerations;

STRATEGIC NATIONAL ROAD CONTEXT

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 Europort. It is noted and welcome that the Draft Plan acknowledges this strategic context.

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.

A number of development designations and specific development objectives outlined in the Draft Plan have 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.

Próiseálann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
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Bonneagar Iompair Éireann
Ionad Gnó Gheata na Páirce
Sráid Gheata na Páirce
Baile Átha Cliath 8
Éire, D08 DK10



Transport Infrastructure Ireland
Parkgate Business Centre
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SPECIFIC DEVELOPMENT OBJECTIVES

a) 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.

b) 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) 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.

d) 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.

Conclusion

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. 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.

It is requested that the foregoing comments and observations are taken into consideration in the preparation of the Arklow & Environs Local Area Plan, 2017 – 2023.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Michael McCormack', written over a horizontal line.

Michael McCormack
Senior Land Use Planner

81

18 AUG 2017

18 AUG 2017

WICKLOW COUNTY COUNCIL
CITY & DISTRICT OFFICE



**Arklow & District
CHAMBER**
IN BUSINESS FOR BUSINESS

Arklow Business Enterprise Centre,
Kilbride Industrial Estate,
Arklow, Co. Wicklow.

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Email: chamber@arklow.ie
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August 18th, 2017

Ref : Arklow & Environs Local Area Plan 2017-2023

Dir Sir/Madam,

On Behalf of the Arklow and District Chamber of Commerce we welcome the opportunity to contribute to the "Arklow & Environs Local Area Plan 2017 – 2023".

The population of Arklow is currently in excess of 14,000 with a plan to increase this by 9000 during the life of the local area plan up to 2023. Traffic congestion in the town has deteriorated significantly on the access roads north and south of the town to the N11 but in particular along Ferrybank to the Bridgewater Shopping Centre and the Main street. The development of the Motorway has filtered additional traffic through the town as people commute to Woodenbridge, Avoca, Aughrim and Carlow due to the lack of exits on the ring road to service these areas directly from the M11. The level of congestion has now reached a point where it is having an adverse impact on the local economy of Arklow and the surrounding district. The congestion is restricting the town's ability to develop business in Arklow due to difficulties for visitors travelling into the centre of the town.

If the greater Arklow area is to cater for a population of 23,000 by 2023 changes will need to be made to access to the Vale Road, Woodenbridge, Avoca, Aughrim, Rathdrum, West Wicklow and Carlow from the M11. The initial planning of the M11 motorway was outlined during 2003 when it was confirmed that a third exit to the town would be accommodated. To this end, an exit spur was outlined clearly off the motorway to link to the Lamberton area and was designed to allow access to the centre of Arklow. However, the best option is to link to the Vale road in view of previous objections in relation to shcols in the Lamberton area. This development concept mirrors access points developed in other towns such as Athlone (Population 15,600) and Mullingar (population 20,103) where three access routes are clearly available – north of the town, south of the town and thirdly direct access to the town centre. This phase of development now needs urgent attention to ease congestion and allow access for business expansion, tourism initiatives and general movement within the town centre. A detailed outline of these plans is contained in the submission.



Arklow Business Enterprise Centre,
Kilbride Industrial Estate,
Arklow, Co. Wicklow.

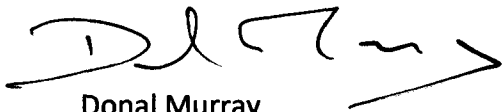
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Recommendations to enhance traffic flow in the centre of the town and ~~support future~~ housing and educational needs have also been addressed in the attached submission. Particular attention should be given to the relief road along the river bank outlined in the submission.

The Arklow and District Chamber of Commerce would welcome any opportunity for further consultation with Wicklow County Council on the Arklow & Environs Local Area Plan 2017 – 2023”.

Yours Sincerely,

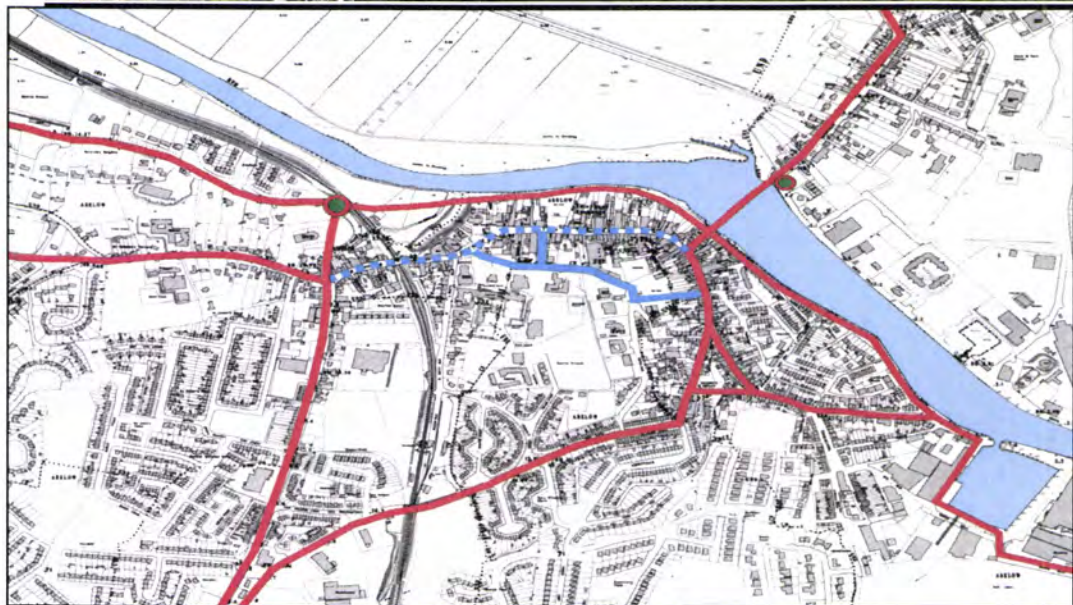


Donal Murray

President of Arklow and District Chamber of Commerce

**REVIEW OF ARKLOW TOWN DEVELOPMENT PLAN
2017 AND PREPARATION OF A NEW TOWN
DEVELOPMENT PLAN 18/8-2017**

SUBMISSION BY ARKLOW CHAMBER OF COMMERCE



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Planning and Development Act

REVIEW OF ARKLOW TOWN AND ENVIRONS LOCAL AREA PLAN 2017 AND PREPARATION OF A NEW TOWN DEVELOPMENT PLAN

SUBMISSION BY ARKLOW CHAMBER OF COMMERCE

INTRODUCTION

Arklow Chamber of Commerce wishes to make a submission on the above in response to the final invitation for submissions as per the public request on the Co Wicklow web site.

The chamber has already made earlier submissions in regard to the earlier draft plan and we have now prepared this one as an update on previous submissions. As stated previously the Chamber has taken a longer view of Arklow's development than the life span of a single Development Plan on how Arklow could develop. This submission looks at the town from a living perspective and again suggests longer-term objectives in order to alleviate some of the restraints associated with the present physical layout.

We have taken a look back over the last 70 years or so to see how the town has developed in that time-scale and what lessons could be learned from our recent past. We are concerned the town should not be constrained in its proper development in the longer term by lack of consideration of important long term factors or the taking of short-term decisions which would inhibit its proper development in the future.

THE PAST.

The Arklow town plan ordinance map 1:2500 scale of 1951 (*Appendix 1*), shows, the town as it was then. This map of the town when compared with the maps prepared for the 2017 Draft Development Plan clearly illustrates the very substantial changes to the town over a relatively short period.

The 1951 map shows practically no housing or industrial developments on the north side of the river. There were no housing estates on the Dublin Road or the Sea Road. There was some older strip development. The whole area of the North Quay was vacant of any development apart from the three houses on Sea View Avenue. There was no Leisure Centre, Entertainment Centre/Swimming Pool, Caravan Park, or Industrial Development in the area between the Avoca River and Porters Rock. All this area is within the town boundary. Today there is very little area left for building within the existing town boundary on this side of town.

On the South side of the Avoca River, houses were just appearing at St. Peter's Place, with some Local Authority housing at Wexford Road and Abbey Street areas. The area enclosed by the Wexford, Coolgreany and Cemetery Roads was devoid of any real development. There was no housing or industrial development in Knockenrahan or Abbeylands. There was a farm where Castle Park is now. The Vale Road was a rural area with no development visible.

Compare the scene today in these areas and we can appreciate the extensive expansion of housing and industry on the north, south and west sides of our town. However the town centre has remained very much as it was in the 1950's with the additional partial relief road at Castle Park, but the Main Street and traffic routes very much as it was then.

In looking forward, we should learn from the past and plan now for what the town should be like well into the 21st century. We should plan for a larger time frame than the life span of the typical Development Plan, which is just six years. In this context Arklow Chamber of Commerce puts forward the following proposals and suggestions to be incorporated in the new Development Plan for Arklow.

THE FUTURE

When the Arklow By-pass was completed, the expected reduction in traffic through the town centre did not materialise, due to the expansion of the population and increased car ownership over the succeeding years. The Town-Centre is once again choked with traffic due to the inadequacies of the main circulation routes within the town centre. By taking a fundamental view of what the town could be like by the year 2050 and putting in place now, a plan with a vision of the future we should be able to make Arklow the most desirable town in the east of Ireland in which to live.

To achieve this, we must have the courage to explore new options, the imagination to look beyond the picture that we now have and the vision to see a future not constrained by the past, where we look at all the possibilities available to us.

PRIMARY OBJECTIVE

The chamber agrees with the plans overall vision as per page 1 of the proposed new town plan. However to reach these objectives we would put more long term radical strategies into the plan that would make the town a better place to live and work in the longer term.

Arklow has many advantages over a lot of towns in Ireland, being a sea-side town with a significant river flowing through it, well connected with road and rail connections to the capital city and located in a county of natural beauty.

If we develop in planned way with long term objectives that maximises on our strengths, we will attract the population and skills, which will attract quality enterprises to locate in Arklow and further increase prosperity for all. Our town can once again become a town of high employment attractive to resident and visitor alike.

To meet this objective for residential, industrial/commercial, and tourism purposes, Arklow must focus on its advantages and expand in a sustainable and appropriate manner.

As a secondary growth area for the Greater Dublin area, our population is expected to double by the year 2040. To achieve this growth or even a figure approaching it, will require radical changes to the town structure if we are to avoid traffic congestion, fragmentation of the town centre and retain a central focus for the business and social areas.

TOWN EXPANSION

Our submission will focus on some of the larger issues of the town development. Looking at the overall land area use, the boundaries of our town are restricted on the east by the sea and to the west by the bypass. This creates a particular consideration in regards to expansion north and south.

The areas immediately outside the town boundary, while within the County Council area should be reserved for residential development, with industrial development located further to the north and south. Commercial development should where possible be developed within the existing town to better integrate a sustainable town central business area.

One radical proposal we are making is to zone an area of the existing marsh for further Town-centre development. This proposal will be developed further in a later section of this submission.

We are of the opinion that the existing town boundary should be extended to cater for the expansion expected under the **“Strategic Planning Guidelines for the Greater Dublin Area”**

TRANSPORTATION AND ROAD SYSTEM

Arklow town suffers badly from a very poor road system which has evolved in a haphazard way, initially from a goat track from the original ferry crossing point on the south side of the river, where the present bridge now is, to the Ormond Castle situated at the present Town Hall. This track, which developed into the main street, also went down to the fishery area. Over time dwellings were built on both sides of these tracks and gradually became the main focus areas of the town, with shops and other businesses established. These tracks became roads over time joining up with tracks from other areas of habitation outside the town, such as Gorey and Coolgreaney (*Appendix 2 Arklow circa 1830*).

This system of tracks or roads set the basic structure of the road network we have in Arklow today. **The constraints this original system lays down for transport today gives rise to the poor circulation system and congestion we now experience.** We now need to look radically at the road system within the town and implement a plan of action to improve it, based on a bold and imaginative approach.

We have set out proposals on how we can improve the circulation and access around the existing and proposed extension to the town centre in the following:

NEW ROAD FROM THE BRIDGE TO THE VALE ROAD AND REALIGNMENT OF THE RIVER UPSTREAM OF THE BRIDGE

We are aware that the draft plan does have as one of its objective, (IT6), the completion of the third interchange onto to the M11 at Lamberton. This would link into the Vale Road and thereby reducing traffic going west having to go through Arklow Main Street. However it has been strongly objected to by the NRA. While the 2017 Development Plan does propose this connection (IT5), the chances of achieving this objective are slim bearing in mind the NRA position.

The Arklow Plan should therefore focus on the road system, where it does have a bigger influence, and this is on the road system inside the M11. As the traffic situation continues to deteriorate consideration has to be given to alternative traffic solutions. In this regard the Chamber puts forward a proposal to construct new circulation routes for traffic. This proposal includes:

- Completion of the Castlepark Road and exit onto the Parade Ground near the Fr Murphy Statue (*Appendix 3*).
- Construct a complete new road along the South-west river bank and joining the Vale road below St Saviours Church. This would cross the Railway deep cutting near the Coomie Lane Bridge, which is the only practical location for crossing the rail line north of the Main street.
- Constructing a new roundabout at the south side of the “19 arches” Bridge which would need to be a piled structure over water (*Appendix 4 and photograph 1*).

The latter proposal would require a realignment of the river upstream of the bridge for a number of reasons, including the widening of the south side embankment to take a new road and a wide amenity area along the river bank. The river would be widened by excavation on the north side of the river in the area and deepened to increase the flow capacity of the channel. The excavated gravel can be used to build up the new river bank on the South side. Additional advantages would be;

1. Improving the flow of the river towards the arches of the bridge, by better alignment of the flow of water.

2. Deepening the river channel thereby improving the flow capacity of the channel. (This would be done in parallel with deepening the depth under the bridge arches and deepening the river downstream of the bridge, to improve the overall capacity of the river to clear flood water.)
3. Deepening the river and using the resulting dredging to raise the level of land at north quay and possibly on part of the marsh would improve the amenity value of the river.
4. This new road would then be the logical crossing point for a new bridge to connect the Kilbride area to the town and not solely depending on the existing bridge.
5. The new road and wide amenity area would encourage the development of commercial/retail on the river front.

A way-leave needs to be preserved to allow a new road to link into the Vale Road from the river bank.

We feel that development of the river side between the Arklow Bridge and Coomie Lane should be restricted to commercial / tourist related development. Private housing development should be discouraged in this area. There should be continuity of facades in line with previous proposals for the riverbank area.

It is appreciated that it will be said that the "Marsh" acts as a flood buffer in the event of extreme rainfall in the river catchment area. However, with proper engineering analysis, it should be possible to reconfigure the river drainage capacity, to take whatever maximum flow arises as a result of extreme weather conditions. There are many examples of towns and cities where flooding has been prevented by widening and deepening existing river channels. The attached drawing shows this proposal in detail. This realignment and deepening of the river would allow the development of an extension of the town centre onto the eastern half of the Marsh backing onto Ferrybank. The excavated river material would be used to raise the level of the Marsh area to be used for Town-centre extension.

RESIDENTIAL EXPANSION

North of the River

We believe the Seabank/Kilinskyduff area is being proposed by the County Council as an industrial area. This area is one of the logical residential expansion areas for the town. Industrial development should be located further north allowing enough land for residential expansion for say the next fifty years or so. The land to the west of the Dublin Road in the county area should also be zoned residential/amenity.

South and West Arklow

On the South side of the town, there is more land zoned residential than on the North due to it being within the town boundary. Again however the area within the town boundary will be inadequate over the longer term and land should be reserved in the county council area for strictly residential purposes. Again we have highlighted areas on the attached map.

BUILDING DENSITIES

The proposal in the Tiros Arklow report on Land Use and Transportation has highlighted the need to increase the density of housing development in the town centre areas as a means to improve the overall sustainability of land use. This would allow the option for more people to live closer to the town centre amenities if they so wish thereby reducing the use of the motorcar to go about day-to-day activities.

BUILDING HEIGHTS

In the new development plan there should be a new approach to the maximum height of buildings allowed in certain areas. Some areas should have building heights in scale with their surroundings particularly when fronting onto large open areas, or expanses of water such as the river or Irish Sea. The Tiros report also makes this suggestion.

This would give a better use of the scarce land resource and provide a better relationship of people to structure. If one were to visualise the streets of central Dublin with a maximum of two and a half story, there would be no feel of place and every street would have a suburban look. The Bridgewater development is an example of scale to location

AMENITY AND LEISURE DEVELOPMENT

NORTH BEACH AREA

With amenity facilities already in position in the North Beach Area, the Protective Embankment should be further developed with a promenade facility from the North Pier to Porters Rock. This can be seen as a huge attraction in other towns e.g. Tramore, for family leisure, walkers and joggers.

The completion of groins at the North Beach should be expedited to allow sand deposits to build up, and give the town back its traditional sandy beaches, with obvious advantages for the locals and tourist industry. 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. An example of the effect of a protrusion or groin into the sea can be seen, by observing the extent of sand deposition behind the north Pier. A large number of seaside towns in the south of England have a system of groins, timber or stone, to protect their beaches. The attached Photographs of the North Beach taken in the 1960's and 2017 show the extent of loss of this amenity (*appendix 5 and 6*).

SOUTH BEACH AREA

Adjacent to the South Beach, Arklow is fortunate enough to have as an amenity one of only 150 Golf Links Course in the World. Whilst this is rare enough in itself, the fact that it is in the centre of the town, surrounded by Industry and Housing, makes it even rarer still and is, we believe, one of less than 10 such amenities in the World. The protective embankment as an amenity should be further developed with proper walking surface from the South Pier to Roadstone.

MARINA DEVELOPMENT

Arklow now has a small marina as part of the Marina Village development. However we feel that the size of this Marina is far too small to cater for the long-term development of sailing and boating in Arklow. A further area of undeveloped land should be earmarked for further expansion of this facility to the East of the existing Marina, which caters for just 36 boats to cater for up to 100 boats. This would build on one of our key assets – a good sheltered harbour, within easy sailing from Dublin and the coast of Wales.

Already the room for pleasure craft in the river is limited and has nearly reached saturation level. This fact was pointed out in our submission to the 1999 Development Plan. If we do not plan for the long term in this leisure area we will have forfeited a key attraction of our town. There is a minimum size for a Marina to be self-financing and we would suggest it is much larger than the present one.

ARKLOW CONCERT HALL/THEATRE

Arklow has a long tradition in Music circles. We have one of the major festivals on the musical calendar in this country, yet we have no proper facility for the performing arts and for our people to show off their talents. We propose that a Concert Hall/Theatre/Conference facility be included in the plan. Ideally this could be located on the North side of the river in the new town centre extension or alternatively near the other amenities in the North Beach Area. This obvious enhancement to what Arklow has to offer our visitors

would have a very positive spin off to the tourist industry. We made this proposal in our 1999 development plan.

THE SOUTH QUAY/DOCKS

We were pleased to see that the Chambers submission to an earlier town development plan resulted in a redesignation of the dock area to a Waterfront Development Zone. However the area now needs an overall development strategy to maximise its potential. In Arklow we have a small number of owners of property around the Dock and it would be possible to produce an overall plan incorporating part of the Dock as a Marina with high-density development of shops, Apartments, Restaurants, Hotel etc. The developments in places like Malahide should be carefully studied to see what we could do with a more diversified development plan for the Arklow Dock area.

NORTH QUAY AREA

The North Quay area, which is within 200 metres of the main street, is an area that is being redeveloped but has still some way to go. As it now looks fairly certain that the old Wallboard plan area is going to be the location for the Wastewater Treatment Plant, it is important that the plant is designed so as not to be intrusive and not cause a nuisance to the adjacent areas. The plant should be fully enclosed.

PEDESTRIANISE THE MAIN STREET

Development of the central shopping area could be greatly enhanced by pedestrianising the Main Street from the Bridge Corner to Bank of Ireland. This would allow the street and the adjoining lanes to develop an ambiance more attractive to residents and visitors alike. The Street could be nicely landscaped to give it a good shopping atmosphere with central canopy structures in parts of the street.

Pedestrianisation of the Main Street is possible if traffic can be diverted around the area. Diversion of traffic around the Main Street can be achieved by providing a new circulating road along the river bank to the Vale Road with a linkage extending the castle Park road to the parade ground using part of the parochial garden and relocation of the Father Murphy Monument. A new road to Castle Park, rejoining the Main Street at the Parade Ground It would also be facilitated by the development of the river bank road as proposed in an earlier section of this submission.

CAR PARKING

Car parking facilities must be improved if the town is to facilitate shopping locally. In this regard we propose to develop the Castle Park ground level car park into a Multi-story Car-park.

ARKLOW BY-PASS AND ACCESS TO THE TOWN

There has been a lot of public debate regarding additional access to the by-pass from the Vale Road. We are of the very strong opinion that it is possible to have a low cost junction 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 Tee junction at the Vale Road it would appear that a low cost solution can be achieved for this very desirable objective. The road markings are already in place as per the original NRA plans for an interchange at this location. This can be seen on the aerial view of the town from the west (Appendix 7).

This would also allow our hinterland area and future residential sections of the community in this area to use the by-pass and not contribute to a traffic situation in the central part of town. Access to the town should be left to the people who need to do business in town. At present people from the hinterland areas still must come through the town to get to Dublin.

TOWN CENTRE EXPANSION.

We propose that very serious consideration 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 National Heritage Area.

We appreciate that this proposal will receive strong opposition from certain groups of people. However if we look back on the history of the town, it will be seen that we would not have a Fishery area, North Quay area or Ferrybank area if these areas had not been reclaimed. See copies of the 1831 and 1950 maps of the town attached to fully appreciate this factor. Sixty acres out of the total undeveloped land in our hinterland is a minute percentage but a percentage, which would have an enormous benefit if used to extend the Arklow town centre.

We envisage the new area developed, containing complementary facilities to the present Main Street area, incorporating new shopping facilities, civic facilities such as a concert hall, a public park, and other amenities appropriate to a major town centre. An impression of what this could be shown in attached drawing (*Appendix 8*).

This would be possible by deepening and widening the stretch of river from IFI to the bridge. One of the schemes to increase the cross-section of the flow area at the bridge as shown in the Arklow Flood Study Report by PH McCarthy & Partners 2002 should be carried out to allow the above town extension. The river below the bridge should also be dredged to avoid flooding in the lower parts of the town.

This area would be linked by a new bridge to the extended river-bank road system proposed from the existing bridge to the Vale Road, and by a new road system to the Dublin Road and Kilbride areas. This would allow a more logical and better system of circulation within the “**town centre cell**”. There would no longer be a need for all traffic to cross the existing bridge or to travel through the centre of town. Arklow would be a much different place with wide boulevards giving access to better civic amenities. We are looking at the wider picture for the next 20-50 years in putting forward this proposal. If the long term development of the town is not considered in this type of time-frame, we will never get beyond the patching-up stage of town development and road system.

SUMMARY

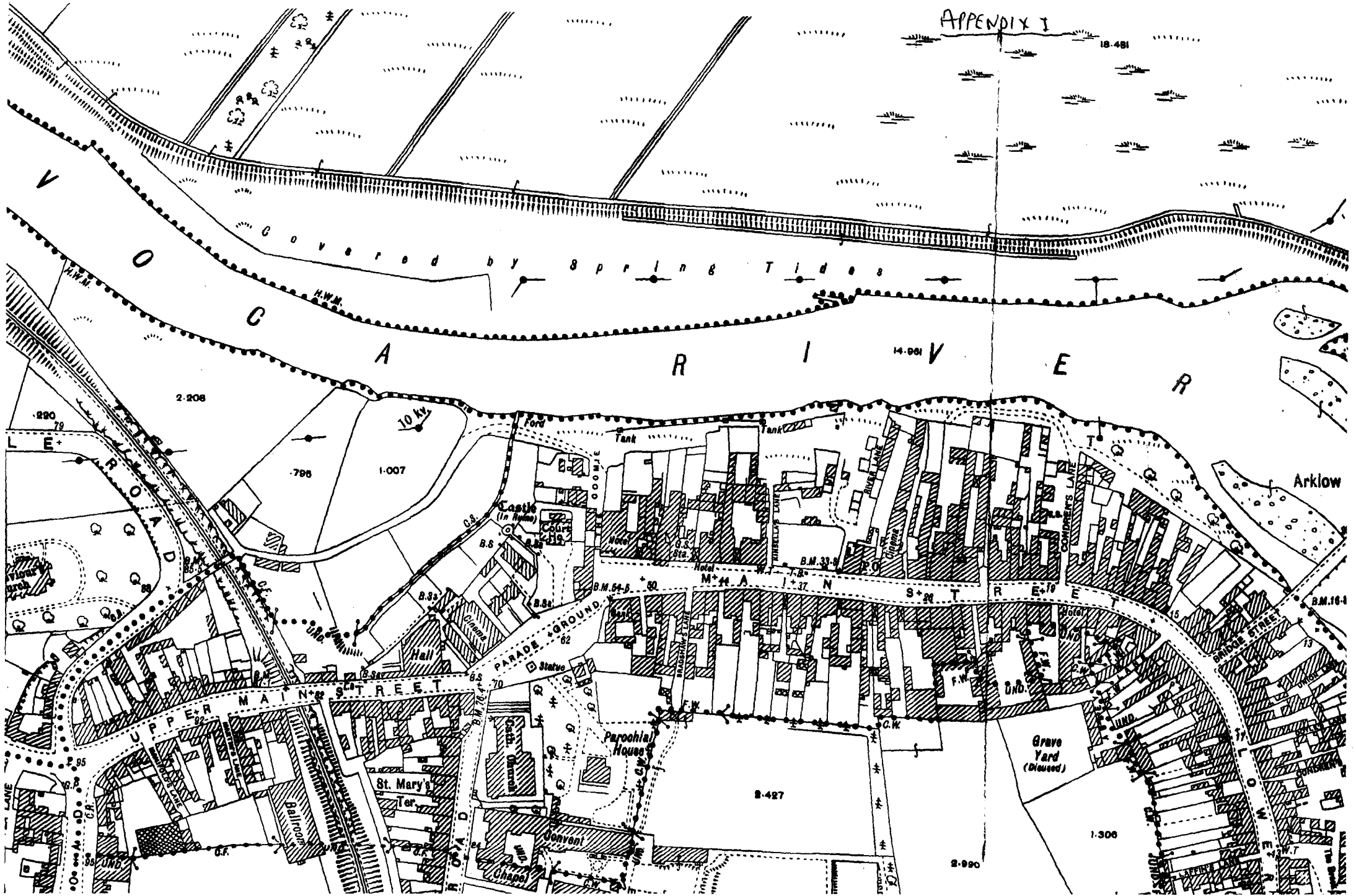
Arklow Chamber of Commerce and is of the view that if the proposals outlined in this submission are adopted as part of the future Town Plans for Arklow, we would be putting the foundations in place to make Arklow a vital and vibrant town on the East Coast. This would make Arklow a very attractive area to live in and encourage investment in jobs, as we would be able to attract the people with skills required by modern businesses and clean industries.

Let us ensure that the people of Arklow, when they look back around the year 2057 at the 2017 plan, will say that the people of that time were very enlightened and foreseeing, as they now have a town that is well planned with the infrastructure and facilities in keeping with the mid twenty first century. Indeed let us hope, they will be able to say that their town is an excellent place to live, with a thriving business/ commercial and industrial base, with attractive streets, quality shopping facilities, and excellent recreational and leisure amenities.

18-8-2017

APPENDIX I

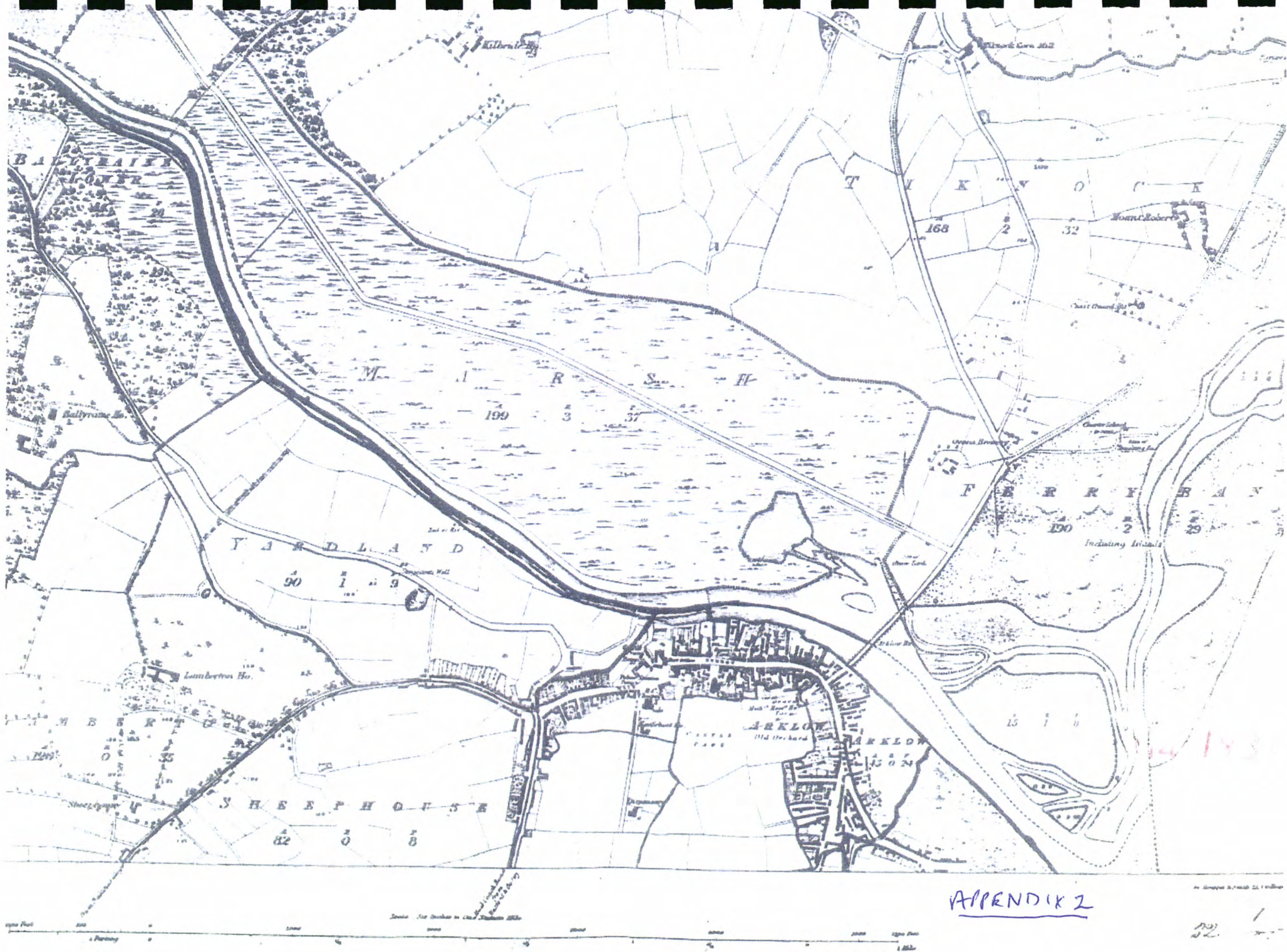
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B.M. 54-5
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Hall
PARADE GROUND
Statue
Parochial House
Convent
Grave Yard (Disused)
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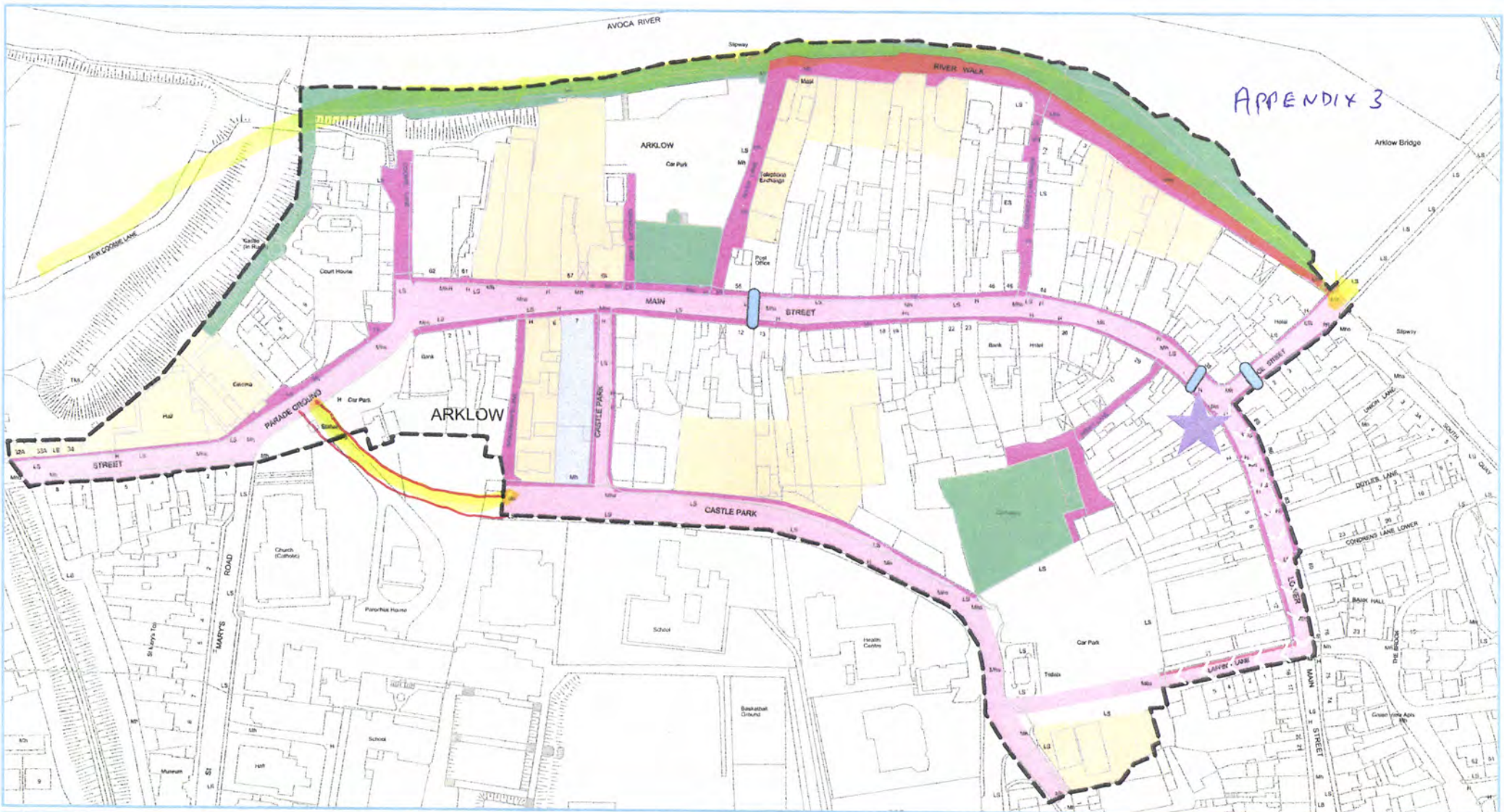
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APPENDIX 2

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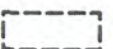








APPENDIX 3



WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022

ARKLOW AND ENVIRONS
LOCAL AREA PLAN 2017 - 2023

TITLE: TOWN CENTRE - PRIMARY STRATEGY
MAP NO.: 5.1

- | | | | |
|---|------------------------------------|---|-----------------------------------|
|  | Foothpaths and side streets |  | Town centre strategy boundary |
|  | Main roads |  | Pedestrian/traffic light crossing |
|  | Car parks |  | One way vehicular traffic |
|  | Open space and walkways |  | Gateway site |
|  | Community facility | | |
|  | Opportunity site for redevelopment | | |



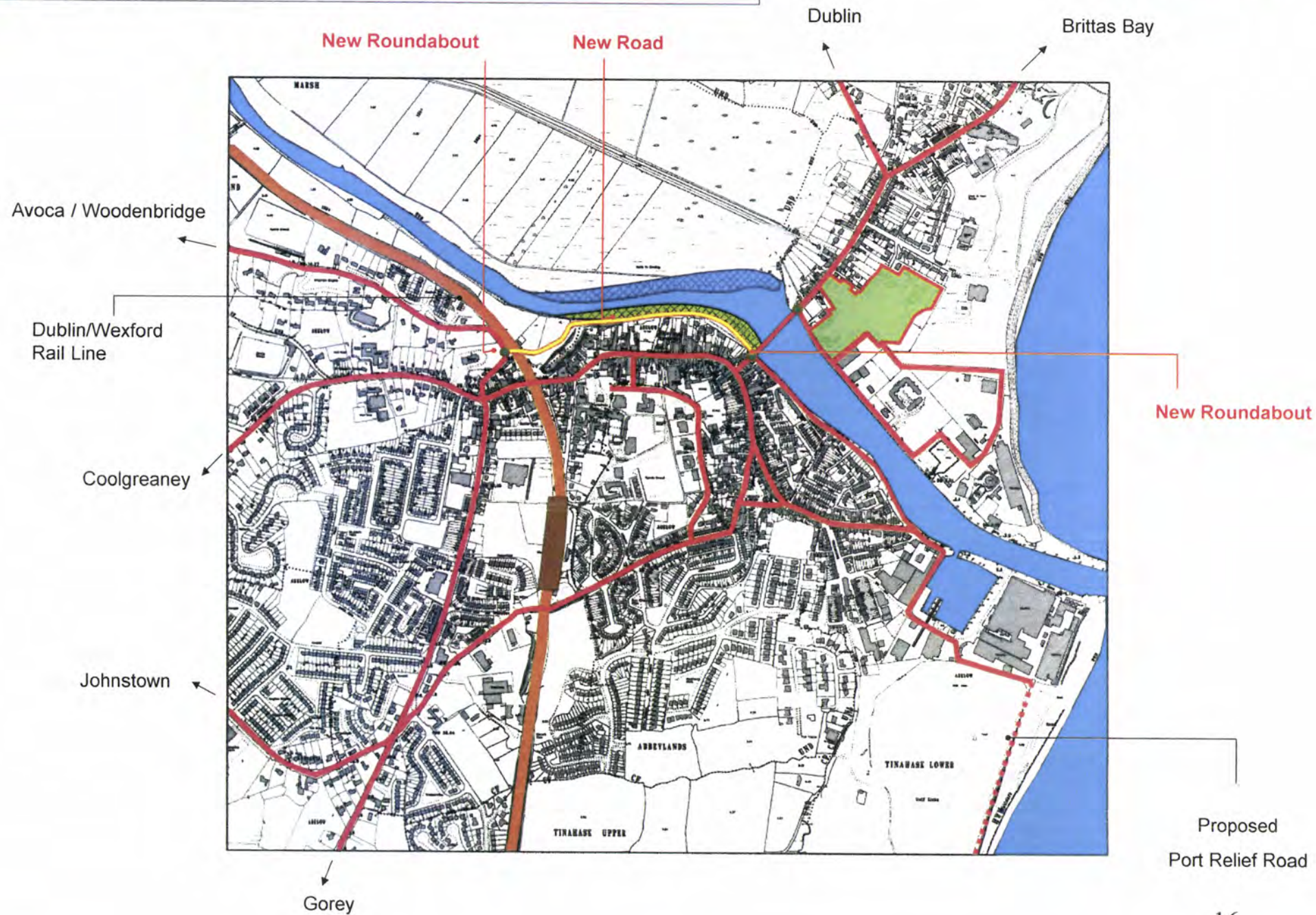
Wicklow County Council
Planning Department

MAPS ARE NOT TO SCALE

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Licence Number 2017/35/CCMA/Wicklow County Council

Arklow Town Centre – New Roads & Roundabouts

Appendix A



APPENDIX 5



2017

APPENDIX 6



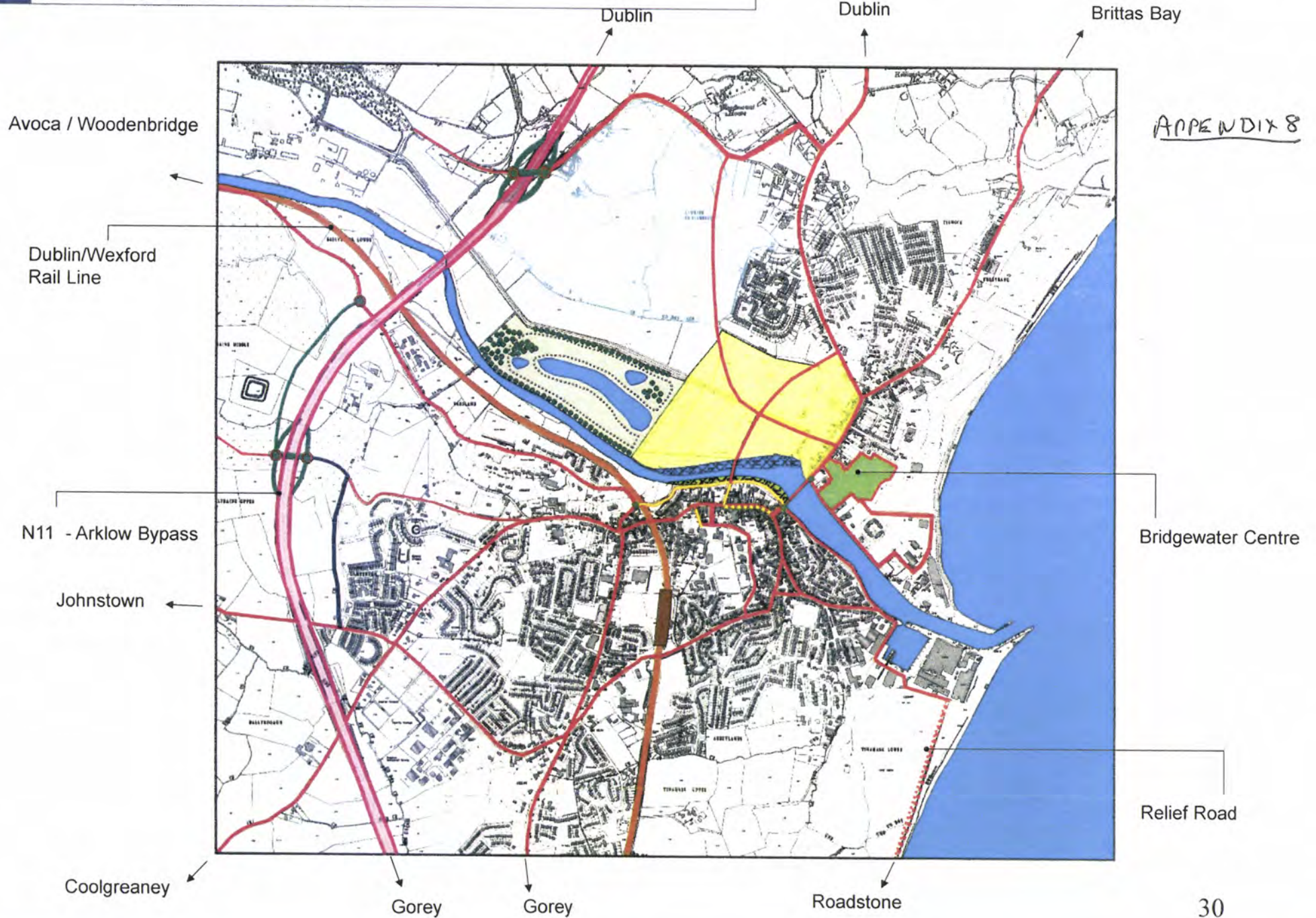


The Beach, Arklow, Co. Wicklow, Ireland

APPENDIX 7



Arklow Development Plan 2020





Leonora Earls

From: Anne O Connell [
Sent: 10 August 2017 19:27
To: Planning - Plan Review
Cc: Anne O'Connell; colin huggett
Subject: comments on the Arklow Draft Local Area Plan
Attachments: Chapter Number LAP.docx

Hello,

Please see attached comments on the Arklow LAP. Apart from my sideswipe at the paucity of housing initiatives undertaken by Arklow District /Wicklow Council the remainder of the points have been read and agreed by various members of Arklow Active Retirement.

The title and number of the various chapters seemed to vary in different sections of the plan so I gave up numbering them and dealt with the theme/title of the chapter.

Yours sincerely,

Anne O'Connell.
Arklow Active Retirement.
10/08/2017



	Name	Comments made on behalf of Arklow Active Retirement. (Chapters are commented on in no particular order)
	Town Centre Strategy & Waterfront	<p>If Arklow is serious about Tourism and the economic benefits it delivers, then a more visible Tourist Office should be relocated in an area with adequate signage and parking for example in the Alps area which could be developed for the following purposes:</p> <p>A Central Museum incorporating the Marine, Cultural, Artistic and Industrial History of Arklow.</p> <p>An independent Theatre</p> <p>Gardens and open space for a transport terminus (tourist buses/taxis)</p> <p>Adequate car parking so Main St can be relieved of car parking on 2 sides. The proposed new Primary Care centre will bring increased footfall to the Main Street. It will also mean more car parking spaces needed perhaps in a 2 storey car park centrally located. The marshy area of Shelton should be reclaimed as a Peoples' Park with access via a new bridge linking the Kilbride area (that is designated for 1500 houses!) to Arklow town centre.</p>
	Community Development Strategy.	<p>In the plan a list of buildings that promotes community development includes many resources that are to be found in Arklow. Missing is the Multi-Purpose Community resource centre, the Arts and Cultural centre and the Local Multi-Purpose Community Space/Meeting Rooms. Obviously the provision of any or all of these buildings would improve Community Development. Local school and parish halls are under enough pressure.</p>
	Tourism & Recreation	<p>The stated aim of the LAP is "to develop the tourism potential of the area as a visitor/tourist attraction in ITSELF and in its role as a "gateway" to surrounding attractions." While many attractions are signposted it is assumed tourists can walk all round Arklow from the Pyramid to Kynochs, the Leisure centre to Abbey Street, Waterfront area and the 2 beaches at South Beach and the Cove.</p> <p>Although members of the public may eventually have access to tourist information via an APP on their mobiles many others rely on the old fashioned method of look/listen/see. With 22 listed buildings to find and see, many tourists of a certain age would find it difficult to find all of Arklow's attractions in one day. Why not make this journey easier for all tourists and fund/encourage a tourist train or tourist bus with guided commentary in English, French, Polish, German, and Spanish during the summer months.</p>
Chapter	Transport Access	<p>Arklow has been bypassed. There is still as little access to the town as in former times. We welcome the mention of a wish to see local roads enhanced with connections to national routes in close proximity to Arklow. Does this include better access for the heavy traffic to enter or exit the port? It has still to go through the town instead of on a dedicated road via the Clogga area. And traffic from Carlow/Aughrim still cannot get onto the (new) motorway via a slip road but has to go through Arklow. The newly zoned residential area around Kilbride will be landlocked without proper access to the motorway which means the Dublin Road will become a car park</p>

		with the new extension to Templeraíne NS as well as the newly planned Educate Together school about to be built. Arklow is seen as the 'market town serving areas like Carnew 'when it is obvious that many people from these areas head to the vibrant town of Gorey for weekly shopping.
	Built & Natural Heritage	Even the empty industrial silos beside the South Quarry deserve to be noted, preserved and appreciated. Hopefully the desire in the plan 'to protect and enhance the heritage of the town and the features of heritage and environmental value' will be translated into appropriate action by Wicklow County Council to protect the Old Kilbride cemetery with its Pyramid from vandalism. The unusual layout of what was once a small fishing village in Tinnahask deserves to be explained visually in the same way Kynochs Walk has been done.
	Integrated land use and Transportation Framework	It is laudable to 'reduce distances people need to travel by car to places'. Many older people do not drive and walking distances may not be an option either. For these reasons and taking note of a mention to have high quality new housing in appropriate locations hopefully some vacant sites near the main street could be zoned for sheltered housing units.
	Balanced Housing	The refusal of most County Councils to take responsibility for and invest in the provision of houses/apartments to those unable to buy/rent accommodation is unforgivable. Yet the LAP expects developers to supply housing which will vary 'in type, size and tenures'. Perhaps Arklow Municipal Council might lead the way and take advantage in a timely fashion of incentives given by central government to address this problem.
	Vibrant Core	The plan mentions a wish to 'support and facilitate social and community development and to increase access and links between new and existing housing areas to community facilities and the Town centre'. A footbridge downstream of the 19 Arches bridge would certainly achieve this and also open up the waterfront area. The aforementioned bridge upstream from the Alps area to Shelton would also link the Templeraíne/Inbhear Mor housing areas to the Town centre.

Arklow Heritage/Nature Walks Development Company Limited

Main
Objective:

To Develop, with the co-operation and permission of land owners, heritage/nature walks,
within the Arklow Environs and along the Arklow Valley west of Shelton Abbey for the
recreation and pleasure of Arklow citizens including visitors and tourists to the town.
Charity Ref: CHY 20643

Arklow Municipal Council
Dunnes Lane
Arklow

RECEIVED

17 AUG 2017

18/8/2017

WICKLOW COUNTY COUNCIL
ARKLOW MUNICIPAL DISTRICT

ARKLOW TOWN DEVELOPMENT PLAN

Proposal for a Footbridge Across the Avoca River to an Arklow Marsh Recreational Area

Arklow heritage/ Nature Walks Dev. Co, Ltd, has been for a number of years, lobbying and planning for the Arklow Marsh be opened up to public access, as an amenity. This proposal was part of the previous Town Development Plan, where the Town Council was tasked to provide a public access and unlock the development potential of the Marsh area.

It is proposed that the marsh and woodland area, once developed, will provide a walking and nature amenity for the local community, and also a much needed tourist attraction, in the centre of the Town.

Proposals and plans for the amenity have previously been submitted to the Municipal Council, fund raising by our company has been on going, €50000 (from the disbanded Arklow Town Council) has been ring fenced by the County Council, LEADER funding has been previously applied for, and a current application is pending.

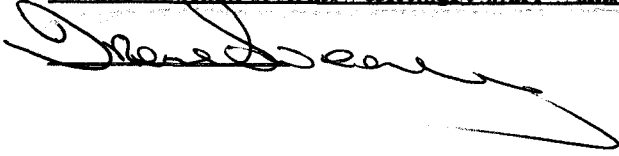
However, the project is still stalled due to the inability to secure public access onto the Marsh area from Ferrybank. Several options have been discussed at length and appear unattainable. An alternative to those options is to build a bridge across the Avoca River from the riverbank in the area of the car park over to the Marsh, and accessing directly onto the, disused, old railway embankment on the north bank of the river.

Attached is a drawing showing the possible site for the footbridge, together with a possible design of the bridge structure.

We would submit that the Municipal Council should renew its commitment from the previous development plan to provide a public access to the Marsh and promote the development of the Marsh amenity for recreational purposes. As part of that commitment the provision of a footbridge across the Avoca River should be an integral part of any plan in providing public access to the Marsh as, currently, it is the only viable access option (in a central location) that is completely under the control of the Municipal Council.

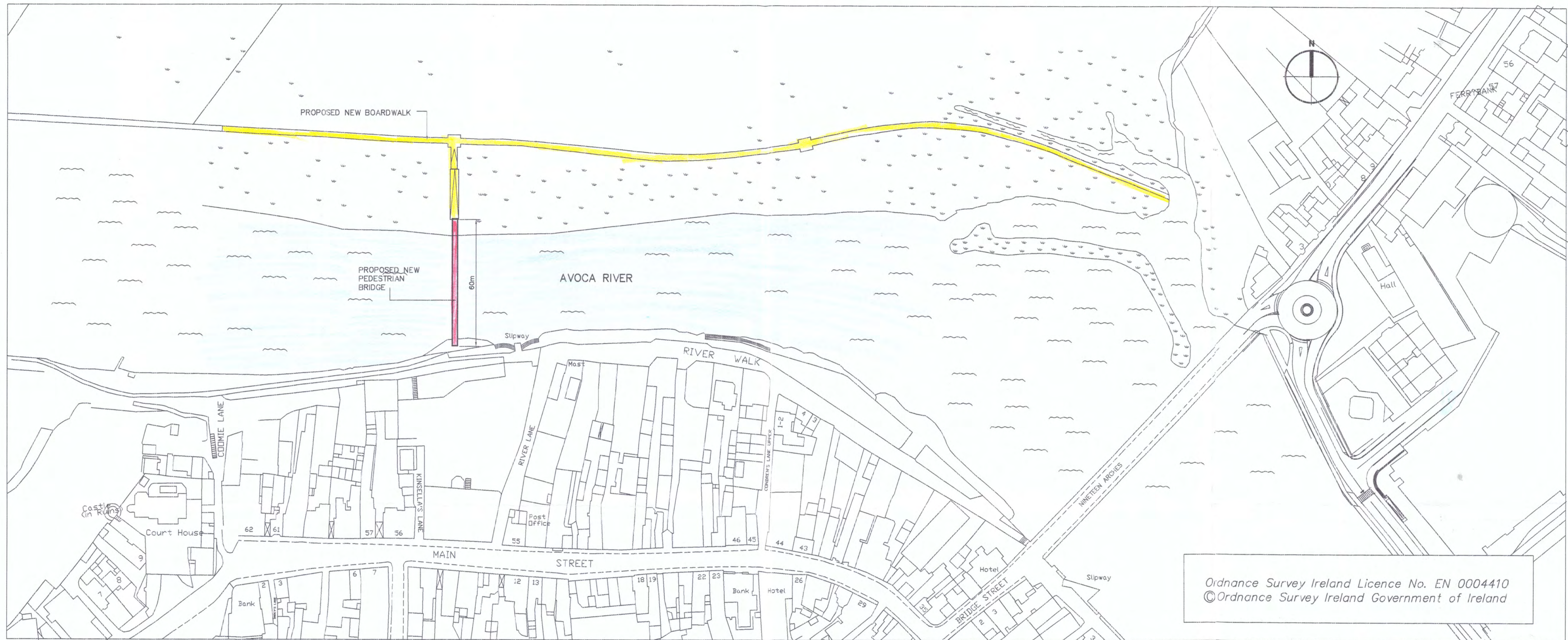
Yours sincerely

For and on behalf of Arklow Heritage/Nature Walks Development Co., Ltd.

A handwritten signature in black ink, appearing to read 'Dempsey', written over the company name.

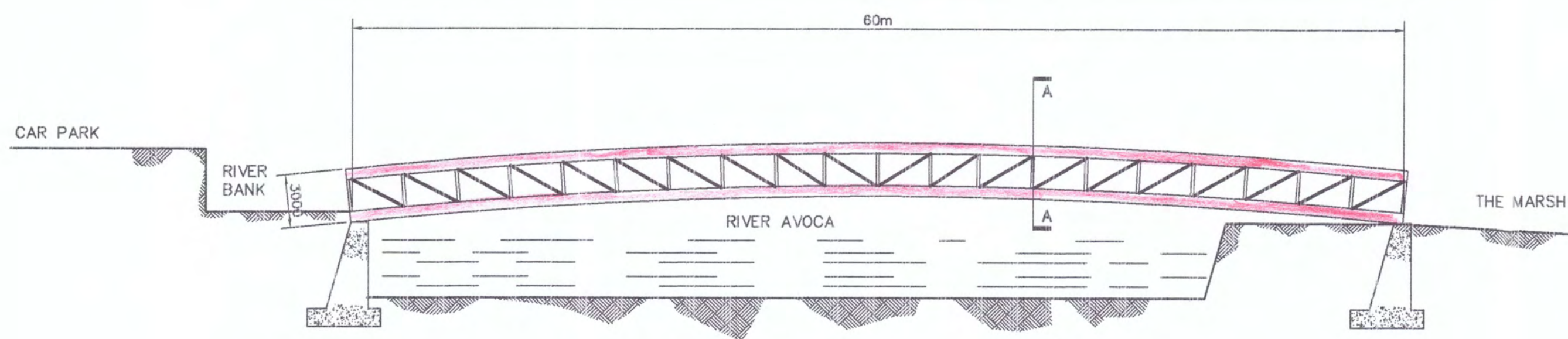
Directors: James Burke Chairman, Roy Dempsey Vice Chairman, Brian King Company Secretary, Irene Sweeney Treasurer, Nancy Keogh, Liam Keogh, Pat O'Shea.

Company Registration No. 524679. CHV 20643. Registered Office: 31 Ferrybank, Arklow



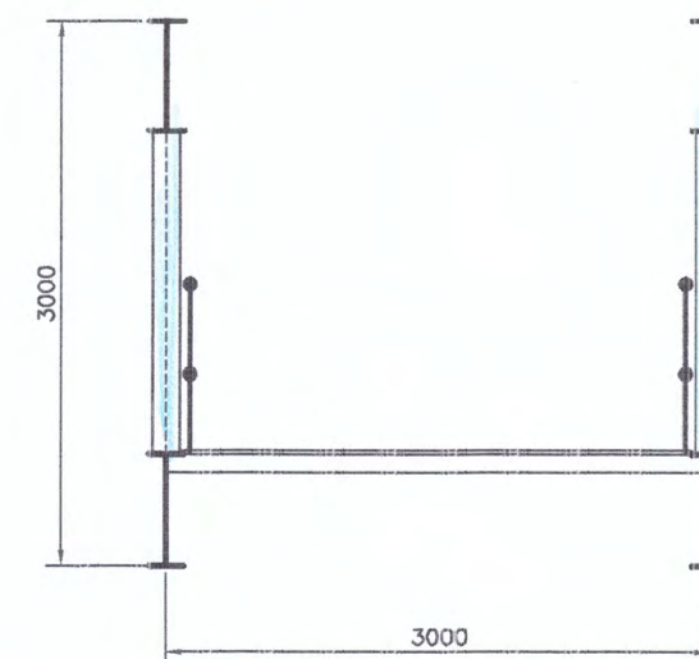
SITE LAYOUT PLAN

WITH REFERENCE TO OS WICKLOW SHEET 442B



ELEVATION OF BRIDGE

SCALE 1:250



CROSS SECTION A-A

SCALE 1:50

REVISION	DATE	DETAILS
JOHN L. O'HANLON & ASSOC. Architectural, Engineering Design and Project Management 69 Lr MAIN ST. ARKLOW Co. WICKLOW E mail: joh@eircom.net tel: .0402 23027 fax: .0402 23027		
CLIENT: <u>ARKLOW HERITAGE NATURE WALKS DEVELOPMENT COMPANY</u>		
TITLE: <u>LAYOUT PLAN AND CROSS SECTION OF PROPOSED PEDESTRIAN BRIDGE ACROSS THE AVOCA RIVER</u>		
DRN JLOH	SCALE AS NOTED	DWG. No. 704c01
DATE 14.4.12		REV.

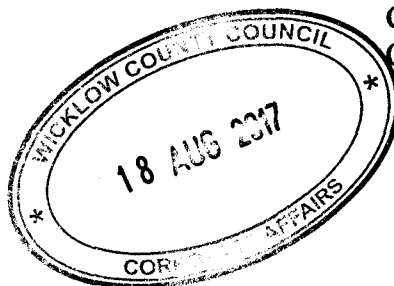


**Arklow
Positive
Ageing**

SCANNED

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town.

Arklow Positive Ageing
C/O Maria Neary
Hillview
Gorey
Co. Wexford.



To whom it concerns.

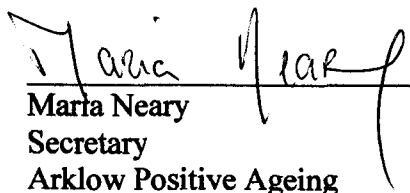
Re: Arklow LAP.

On behalf of Arklow Positive Ageing please be kind enough to accept the following submission.

I enclose copies of the following

- Copy of Our Constitution
- Current Bank Statement
- Our Activities Leaflet

Kind Regards,



 Maria Neary
 Secretary
 Arklow Positive Ageing



Bank account statement was included but returned.



*Arklow
Positive
Ageing*

LAP SUBMISSION

With regard to the above we would like to know what is happening to our town of Arklow? In the past 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.

People used to come from all over to stay in Arklow and now its 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?

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 discos 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.

Take the 56 for example what is happening to that premises????, same goes for the old Morgan Doyles building, the Marine Hotel and all the other vacant premises around our town they are becoming an eye sore.

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.

Arklow Positive Aging Constitution

1. Title

- The title our organisation shall be Arklow Positive Aging
- Arklow Positive Aging is affiliated with Age Action Ireland.

2. Main Object:

“To improve the quality of life and to promote social inclusion and integration for the benefit of older people in Arklow and surrounding areas and to promote a more positive attitude to aging and retirement by providing a focal; point for retired people to meet socially, arranging occasional outings and get-togethers.”

3. Subsidiary objects.

“In furtherance exclusively of the fore coming main object the organisation shall have the following subsidiary objects”.

1. To dispel the many negative perceptions that surround aging
2. To transform attitudes towards ageing and older people
3. To promote social inclusion and integration through all ages of our society
4. To provide a spirit of friendship, trust and mutual pleasure in each other’s company.
5. To create a safe and friendly environment for all ages.
6. To share experiences and information with each other.
7. To provide loyal friendship and support.
8. To provide a social outlet.
9. To increase awareness in our local community.
10. To hosts events and talks on a range of relevant topics.
11. To network with other groups.
12. Support each other at difficult times i.e. sickness or bereavement.

4. Members and their role

- Membership is open to people of all ages.
- Membership fees of €10 annually.

5. Committee

- The committee will consist of a minimum of 8 members who will be elected at the AGM
- The period of office for each committee member will be 2 years.
- At least 3 of the members of the outgoing committee shall remain on for the purpose of continuity. These places will be decided by the outgoing committee.
- Any member of Arklow Positive Aging may stand for election onto the committee.
- The committee shall consist of:
 - Chairperson
 - Vice-Chairperson
 - Secretary
 - Treasurer
 - PRO / Communication officer

6. Election of the Committee

- Committee members will be deemed elected following nominations at the AGM by being proposed and seconded and approved by the majority of our club members.
- ✗ • Current members who have completed two years of office will be eligible for re-nomination to the incoming committee. For the purpose of this rule, a member who has completed two years of office in any of the previous years will be eligible for re-nomination.
- In the event of an officer's post falling vacant the committee may co-opt a member to fill the vacancy until the AGM.

7. Termination of Membership of the committee

- A member of the committee shall cease to be a member if he or she is absent from three consecutive Committee meetings without a relevant reason.
- A member of the committee may resign by sending written resignation to the secretary or chairperson of the committee.

8. Role of committee members

- To actively participate at the meetings
- To help with the organisation of our events / programmes.
- To raise relevant views, concerns, issues etc. of the ordinary members of our club.
- To liaise and make representation and develop links on behalf of our members with statutory agencies and other community groups.
- To support other members of the committee and to support the decisions of the committee.
- To promote the work of the club to the wider community.
- To maintain confidentiality in all matters in relation to the club.
- In addition the following tasks will apply to individual officers:

CHAIRPERSON:

- To chair committee meetings.
- To ensure that the work of the committee and the organisation is ongoing.
- To ensure that the ordinary meetings are conducted and organised efficiently and keeping with the association constitution.
- ✗ ➤ Represent our club at external group^s as necessary.

VICE-CHAIRPERSON:

- Liaise with and support the chairperson.

SECRETARY:

- To record accurate and concise records of all committee meetings.
- To ensure that the members list is kept up to date and that the information is accurate.
- ✗ ➤ To correspond with various external organisation^s as necessary.
- To contact and inform all committee members of meetings and forthcoming events.
- To contact members re events etc.

TREASURER:

- To ensure that the correct records are kept regarding all monetary transactions.
- To ensure that all the records are safely and confidentially stored.
- * ➤ To ensure that there are at least two current Officers of the Executive Committee's named as signatories on the club account at all times. *Should this be 3? See Item 11*
- To organise payment to speakers.
- To pay rent and invoices as they occur.
- To liaise closely with committee regarding reports to funding bodies.

* Consideration should be given to the fact that the club account should be held in the name of the club.

PRO:

- To communicate with members re activities of the club.
- To encourage the promotion of the association.
- To encourage that the ordinary meetings of the organisation are advertised as much as possible.

9. Proceeding the meeting

- At any committee meeting, six members shall constitute a quorum.
- Matters arising at any committee meeting shall be decided by open or through discussion. Where a consensus cannot be reached a decision will be made by voting. In the case of equal votes the chairperson will have the casting vote.
- Any discussion on a specific issue remains confidential to the people at the meeting. No committee member shall repeat other member's individual options outside of the committee. Only the committee final decisions will be communicated to the non-committee members.

10. AGM/ Special Meetings

- * • An AGM will take place annually not more than 13 months after the AGM.
- Income and Expenditure Accounts in respect of the preceding year shall be presented and agreed at the AGM.
- A Chairperson's report outlining the previous year's activities will be presented at the AGM.
- An extraordinary general meeting can be called at any time at the request of the Committee or one quarter of the membership.
- The Secretary or Chairperson of the Committee shall send the details of the date, time, venue and agenda of each AGM to each member at least three weeks before the date of the meeting.

11. Finance

- The Committee is responsible for all income and expenditure. Any expenditure must be agreed by the Committee at local Committee meetings. The Committee will ensure that proper books and accounts are kept.
- Any monies held by the organisation shall be held in the name of Arklow Positive Ageing.
- A bank account will be established with 3 signatories of the Officers of the Executive Committee appointed. All cheques shall be signed by two of these signatories.
- All financial transactions will be recorded in the minutes and the treasurer shall keep proper records of the finances of the organisation.

12. Dissolution

If upon the winding up or dissolution of the body there remains, after the satisfaction of all its debts and liabilities, any property whatsoever, it shall not be paid to or distributed among the members of the body. Instead, such property shall be given or transferred to some other charitable institution or institutions having main objects similar to the main objects of the body. The institution or institutions to which the property is to be given or transferred shall prohibit the distribution of its or their income and property among its or their members to an extent at least as great as is imposed on the body under or by virtue of Clause 14 hereof. Members of the body shall select the relevant institution or institutions at or before the time of dissolution, and if and so far as effect cannot be given to such provisions, then the property shall be given or transferred to some charitable object.

13. Additions, Alterations or Amendments

- No additions, alterations or amendments shall be made to or in the provision of this constitution for the time being in force unless the same shall have previously approved in writing by the revenue commissioners. The Constitution may only be amended by a two third majority of the members present and voting at the AGM.

14. Income and Property

- The income and property of the body, shall be applied solely towards the promotion of its main object as set forth in this Constitution. No portion of the body's income and property shall be paid or transferred directly or indirectly by way of dividend, bonus or otherwise howsoever by way of profit, to the members of the body. No Officer shall be appointed to any office of the body paid by salary or fees, or receive any remuneration or other benefit in money or money's worth from the body. However, nothing shall prevent any payment in good faith by the body of:
 - a) reasonable and proper remuneration to any member of the body (not being an Officer) for any services rendered to the body;
 - b) interest at a rate not exceeding 5% per annum on money lent by Officers or other members of the body to the body;
 - c) reasonable and proper rent for premises demised and let by any member of the body (including any Officer) to the body;
 - d) reasonable and proper out-of-pocket expenses incurred by any Officer in connection with their attendance to any matter affecting the body;
 - e) fees, remuneration or other benefit in money or money's worth to any Company of which an Officer may be a member holding not more than one hundredth part of the issued capital of such Company

15. Keeping of Accounts

- Annual audited accounts shall be kept and made available to the Revenue Commissioners on request.

This Constitution was adapted at our AGM on 25th Jun 2016

ADOPTED BY:

Signed: Joe Redmond Chairperson

Signed: Anna Hines Secretary

Signed: Geoffrey Sully Treasurer

Dated: 18 - 4 - 16

Arklow Celebrates Positive Ageing Week

Positive Ageing Week (September 25 to October 12) is an annual event run by Age Action Ireland to celebrate ageing and is now Ireland's largest celebration of positive ageing. This year Age Action is celebrating 14 years of Positive Ageing Week and the event is proudly sponsored by Bank of Ireland.

"The purpose of the week is to show that ageing is not something to fear but something to celebrate", former Age Action chief Robin Webster said. "It is an opportunity for older people to enjoy themselves and for communities to recognise the contribution which older people have made and continue to make in their localities."

Arklow has been a positive ageing town for the last 9 years and this year once again has a varied programme with something for everybody. This year there are also events in Avoca and Aughrim.

We would like to thank all our sponsors Bank of Ireland, Arklow Lions Club, O'Mahony Bros. and Wicklow County Council.

Arklow Positive Ageing Committee is chaired by Joe Redmond and members include Gertie Salley, Anne Keegan, John Summers, Rose Farrell, Tony Nobbs, Noeleen Brauders, Tommy Annesley, Pat Fitzgerald, Liam King and Marie Neary.

Arklow Positive Ageing committee invites all older people in Wicklow to get out and about and celebrate Positive Ageing Week.



Celebrate

ARKLOW

POSITIVE AGEING WEEK

SEPTEMBER 25TH TO OCTOBER 12TH

**For more information on
activities during
Positive Ageing Week
please contact:**

Arklow Positive Ageing Committee:
086 0817534

Proudly Supported by



Join in the fun!

Celebrate

ARKLOW

POSITIVE AGEING WEEK

SEPTEMBER 25TH TO OCTOBER 12TH

Proudly Supported by



POSITIVE AGEING WEEK 2016

SEPTEMBER 25TH - OCTOBER 12TH

AgeAction
For all older people

CALENDAR OF EVENTS



September 25th

Avoca Tea Dance. Music by "The Wicklow Man".
Starts at 3pm in the Old School. Cost €5

September 30th

Official Opening of Positive Age Week in Arus Lorcaín
Hosted by the Arklow and Avoca Active Retirement groups at 11am

October 1st

Country Market at Arklow Pigeon Club from 10.30am to 1pm

Bingo in Arus Lorcaín at 8.30pm. Books €5.00 and sheets €2.00

October 2nd

Harvest thanksgiving in St. Saviours Church Arklow at 3pm

October 3rd

Walk around Ballyraine at 10am

Aughrim Active Retirement Tea Dance in the Pavilion at 3pm

October 4th

Football Blitz in Pearse Park at 10am

Coffee Morning in the Bank Of Ireland from 10am

October 5th

Carnew Community Care at 1.45pm. Bus leaving Tesco at 12.30pm

Fun Night in the Friendship Centre Arklow from 8pm-10.00pm

October 6th

Trip to Carlow - Bus leaving Tesco at 9.30am. Cost €10

October 7th

Coffee Morning in the Breffini from 10am-12pm

Bingo in the Asgard Lodge Nursing Home at 3pm

October 8th

Country Market at Arklow Pigeon Club from 10.30am-1pm.

Arklow Positive Ageing Dinner Dance in the Arklow Bay Hotel
at 8pm. Music is by "Unity". Adm is €20.00

October 9th

Mystery Tour: Bus leaving Tesco car park at 9.30am. Cost €20.00

October 12th

Tea Dance in PortView from 13.30pm-15.30pm

Lisa Rothwell

From: Arklow Shipping [jn@asl.ie]
Sent: 18 August 2017 15:11
To: Planning - Plan Review
Subject: Draft Arklow and Environs Local Area Plan 2017
Attachments: A Shipping Comments on Draft LAP.pdf

Doc-No. 6849465 18/AUG/2017 (FRI) 15:11 (+0100) JN

Arklow Shipping
North Quay, Arklow, Ireland

Tel: +353 402 39901
Fax: +353 402 39902
Email: jn@asl.ie
www: asl.ie

Dear Sirs

Please see attached submission on behalf of Arklow Shipping.

Your faithfully

Joe Nelson
Director

--
This email has been scanned for viruses and malware at source by Sophos UTM, however it is advised that you subject all messages and attachments using your own screening procedures.

Arklow Shipping

B5

NORTH QUAY, ARKLOW, CO. WICKLOW, Y14 TW68, IRELAND
TELEPHONE: +353 (0) 402 39901. TELEFAX: +353 (0) 402 39902, EMAIL: chartering@asl.ie

18 August 2017

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

DRAFT ARKLOW AND ENVIRONS LOCAL AREA PLAN 2017

Dear Sirs

We have reviewed the above Plan and have the following comments, principally in connection with infrastructure in the Town:

1. Traffic across the nineteen arches bridge is backed up on a daily basis even at what should be considered off peak times. The necessity for a new bridge and relief road is clear. We see that there is a planned road and bridge referred to as IT5. This, together with the related link to Woodenbridge (IT6), are critical, not just for the future development of the Town, but also for the current day to day needs. We note that this "...may be seen as a long term goal...". In our opinion, action is needed on this point as soon as possible.

2. Water Treatment Plant – we are aware of the plans for the proposed Water Treatment Plant and its importance to the Town. We make two points in this regard:

- Pending the construction of the Plant, future development should be allowed in the Town as envisaged in the Plan with access to temporary treatment solutions until the new Plant is operational.
- We do not believe that the proposed location of the Plant is ideal given the proximity to existing residences and believe that it will have a negative impact on the potential of lands on the North Quay which is where dense, mixed use development should occur close to all of the amenities of the Town.

3. Flood Risk is a significant issue for the Town. We are aware of the planned Flood Relief Scheme. We make two points in this regard:

- The quay walls at the North and South quays should be raised by at least 1 metre. This should be progressed as soon as possible to protect existing and potential future development.
- The existing coastal defence at the North Beach should be raised by at least two metres and extended from the North Pier to "Spion Kop".

Yours faithfully


James S. Tyrrell
Director



Arklow Shipping Unlimited Company trading as Arklow Shipping

Directors: Sheila M Tyrrell, James S Tyrrell, James A Tyrrell, Patrick Corcoran, Joseph Nelson, James Kavanagh, Adrian Teggan, Peter Schalk (Dutch), Piet Govers (Dutch), Floris Deckers (Dutch)

Registered in the Republic of Ireland, No 23605 Registered Office - North Quay, Arklow

Lisa Rothwell

From: catherine mara [catherine@mara.ie]
Sent: 18 August 2017 14:24
To: Planning - Plan Review
Cc: mylesbalfeld@eircom.net
Subject: 1746-06 Arklow LAP Submission
Attachments: 1746-06 Draft Arklow LAP Submission 2017_08_17.pdf

Dear Sir/Madam,

Please see attached submission which we make on behalf of our client Mr. Myles Balfe in relation to the DRAFT Arklow and Environs Local Area Plan 2017 – 2023.

We would appreciate if you could confirm receipt of same by return please.

Kind regards,

Catherine Mara - MRIA

MARA Architects

2nd Floor, 51 Clontarf Road,
Clontarf,
Dublin 3.

W: www.mara.ie
Mob: +353 87 2260349
Ph: +353 1 8878695
E: catherine@mara.ie



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B6

MARA Architects

2nd Floor, No.51 Clontarf Road,
Clontarf,
Dublin 3.

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

15th August 2017
Our Ref: 1746-06

BY EMAIL: planreview@wicklowcoco.ie

Re: **ARKLOW LAP (ARKLOW & ENVIRONS LOCAL AREA PLAN 2017 – 2023)**

Dear Sirs,

In response to the Public Notice issued pursuant to Section 20 of the Planning and Development Act 2000 (as amended) that Wicklow County Council proposes to make a new Local Area Plan (LAP) for Arklow and Environs.

It is our understanding that Wicklow County Council proposes to make a new Local Area Plan (LAP) for Arklow and Environs. This plan will, when adopted, replace the existing 'Arklow Town and Environs Development Plan 2011 - 2017' and the new LAP should then be read in conjunction with the County Wicklow Development Plan (CDP) 2016 – 2022.

On behalf of our client, Mr. Myles Balfe, we hereby make the following submission in relation to these draft documents prepared.

We would very much appreciate if this submission could be given careful and considered attention in this respect, and that amendments hereby suggested are made to the **DRAFT ARKLOW & ENVIRONS LOCAL AREA PLAN 2017 – 2023** prior to final ratification.

1. BACKGROUND TO SUBMISSION:

Our client Mr. Myles Balfe, on whose behalf we make this submission, is the owner of lands at Ballynattin in South Arklow, Co. Wicklow.

As per the **current** *Arklow Town & Environs Local Area Development Plan 2011-2017*, this site is zoned for commercial development and use as follows:

'TOURISM : TO PROVIDE FOR TOURISM RELATED USES INCLUDING TOURIST ACCOMMODATION.'



Figure 1 – Aerial Map of Arklow Town and surrounding areas, with relevant lands at Ballynattin shown highlighted in red.

This current zoning Permits in Principle the following classes of development at present on these lands:

- Bed & Breakfast, Car Park (including Park ‘n Ride), Community Facility, Crèche/Childcare Facility, Cultural use, Education, Golf Course, Guesthouse, Holiday Homes, Hotel/Motel, Public Services, Recreational Buildings.

There are also other classes of development listed for these lands which are described in the Development Plan matrix as “Not Normally Permitted”, but which are uses that may be considered acceptable where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects, and would otherwise be consistent with the proper planning and sustainable development of the area, as follows:

- Cinema, Doctor/Dentist, Recreational Facility/ Sports Club, Restaurant, Shop Local and Theatre.

As is clearly demonstrated by the current zoning matrix described above, there are currently multiple possibilities for the development of these lands allowed for and indeed encouraged in the current *Arklow Town & Environs Local Area Development Plan 2011-2017* which would have both a meaningful and positive community and economic benefit to the town of Arklow and the hinterlands that surround.

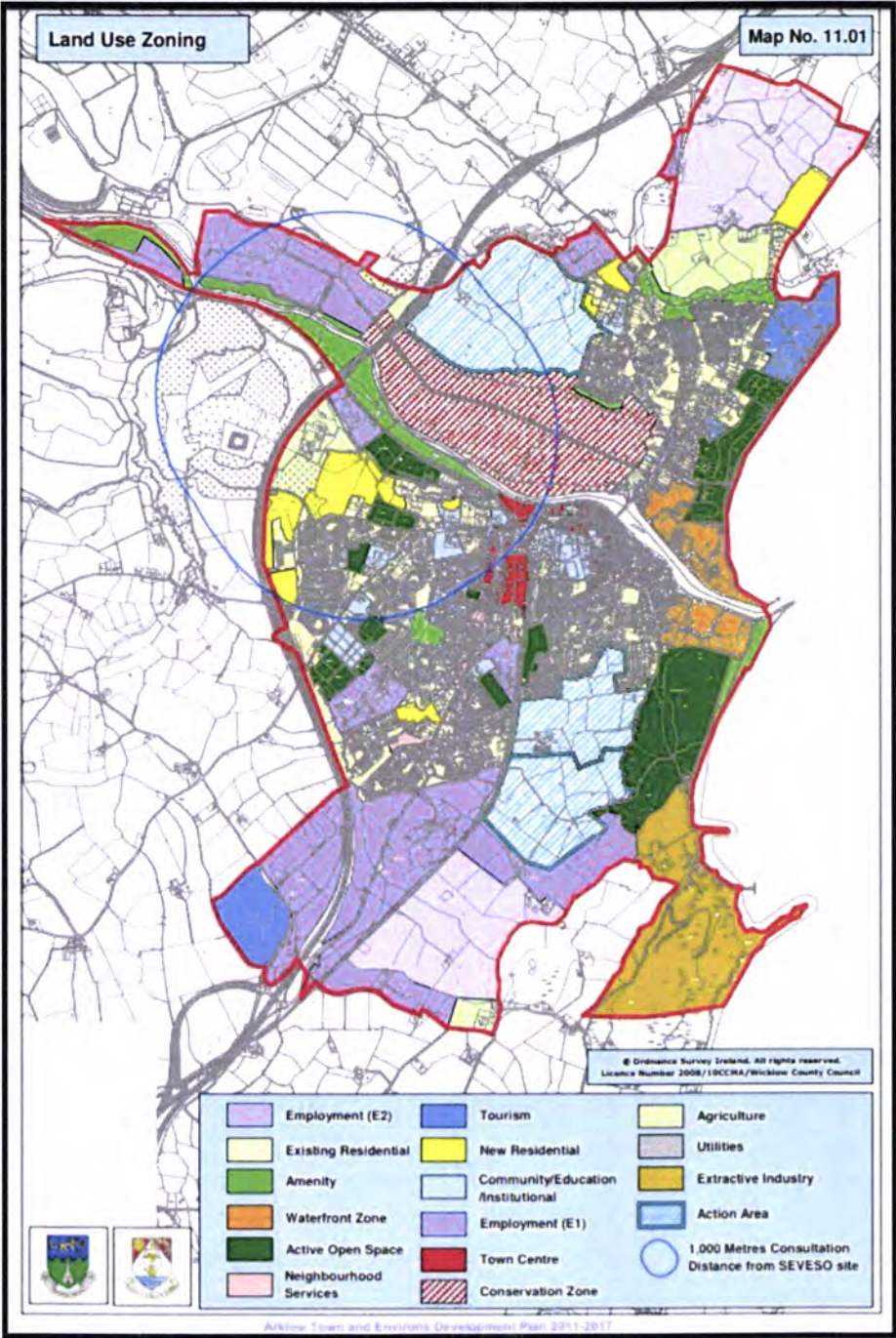


Figure 2 – Zoning Map, current *Arklow Town and Environs Development Plan 2011-2017* (Showing relevant lands at Ballynattin inside of boundary of Arklow and Environs)

To our client's dismay and great upset, he has become aware that the draft **ARKLOW & ENVIRONS LOCAL AREA PLAN 2017 – 2023** to which this submission relates, indicates the intention to de-zone these lands, removing them from the bounds of the Arklow Town and environs area.

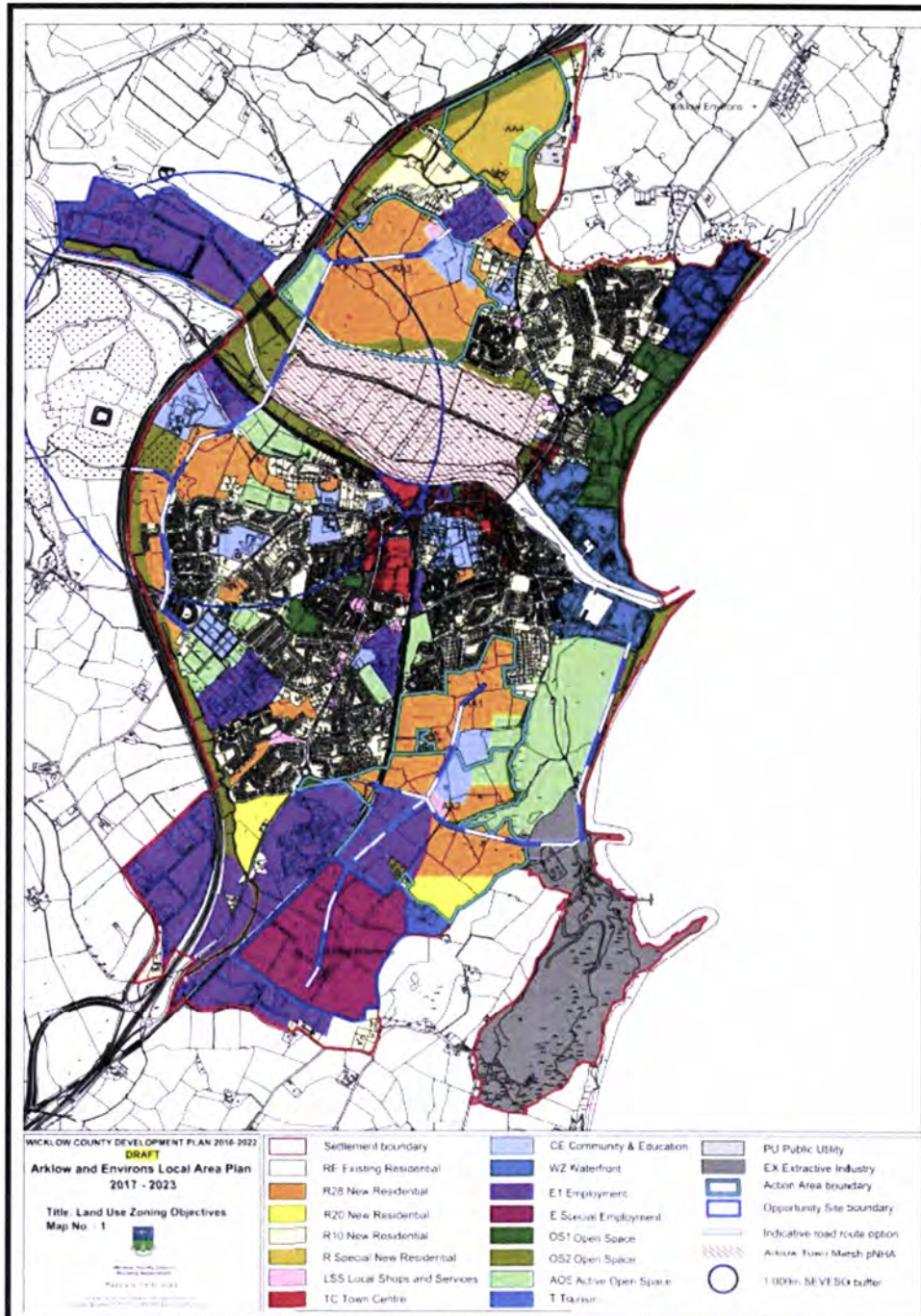


Figure 3 – Zoning Map, DRAFT Arklow & Environs Local Area Plan 2017-2023
 (Showing relevant lands at Ballynattin now outside of boundary of Arklow and Environs)

Our client would appeal to Wicklow County Council and the forward planning Department to reinstate these lands within the boundary as delineated for Arklow and Environs, and to reinstate the zoning that currently attributes to these lands.

2. DESCRIPTION OF THE RELEVANT LANDS AT BALLYNATTIN, ARKLOW:

These lands form a sizeable plot of 15 hectares in the South Arklow area. They are located directly adjacent to a spur access from the M11 motorway which passes by the side of the lands, and from which there is excellent infrastructure provided by way of a 5 spur roundabout exiting from the northbound lane, and underpass giving access to southbound lane of the motorway for homes and businesses in this area.

There is accessible road frontage to 50% of the perimeter of the lands, and the road that bounds the site is for the most part straight with excellent sight lines.

These lands are currently undeveloped with only some small buildings present on the site, but in the immediate surrounds are a number of successful businesses and industries such as Kish Business Park, Elavon Merchant Services, Armstrong Timber Engineering and Servier Pharmaceuticals to name a few.

These lands by the very nature of the shape, orientation and accessibility, as well as close proximity to other commercial developments in Arklow and Environs are more than suitable for the commercial use for which they are currently zoned to allow.

3. PLANNING HISTORY OF THESE LANDS AT BALLYNATTIN, ARKLOW:

Mr. Balfe has owned these lands for some considerable time, and has successfully sought to establish development on them previously.

In 2005, Mr Balfe submitted an extremely detailed and comprehensive planning application to Wicklow County Council for the ambitious and substantial development of these lands, register reference 042092, described as follows:

Register Reference: 042092

'A proposed integrated tourism, recreation, leisure complex including hotel, conference centre, leisure centre, swimming pool, 742 off street car parking spaces, access and ancillary site works.'

There were no 3rd party objections raised to this planning application, and permission was granted by Wicklow County Council on the 4th November 2005.

Despite being granted this permission in full, it was not possible for Mr Balfe to proceed with this development in the following years due to technical reasons outside of his control, as well as the obvious downturn in the economy resulting in funding being withdrawn.

In 2010, Mr. Balfe applied to Wicklow County Council for an extension of duration of the permission on technical grounds, register reference 102857, and he was subsequently granted permission to extend the duration of the permission until 3rd November 2015.

Unfortunately, as the economy continued to falter, Mr. Balfe was unable to secure in contract an appropriate hotel operator and together with this the required funding to proceed with the development in the timeline allowed, and as a result the planning permission has since lapsed.

It is obvious from the initial grant of planning permission for this substantial complex development by the Planning Department of Wicklow County Council, together with their decision to grant an extension to the permission of an additional 5 years of duration that it was considered a development to be of huge benefit to the Arklow and Environs area.

If Wicklow County Council deemed it appropriate and suitable to include these lands within the bounds of the Arklow and Environs area to date; to allow zoning of the lands for Tourism; to grant permission for a very substantial and complex Tourism development requiring huge investment, and then extend the duration of this permission, why would it make any sense to now omit these lands from the zoned area altogether going forward?

The development as previously permitted was an ambitious development which would require substantial economic investment to establish, but which would in turn create huge numbers of jobs during construction and into the future for residents of the Arklow area, and would in turn be of huge economic benefit to the local economy and other businesses surrounding also.

4. TOURISM INDUSTRY SUMMARY:

As referred to above, all sectors of industry have suffered considerably because of the economic downturn of recent years, resulting in many developments not being able to proceed. However, as is now widely reported, the economy has turned a corner in the last couple of years and is on the lift again. Construction and development is once again moving at a pace, and finance for development has become more readily available once again.

In particular, within the Tourism industry, this is the case, and huge efforts are being made to both promote the tourism sector as well as to provide the appropriate facilities to meet the needs of the tourism sector. Bord Fáilte are now actively promoting Ireland's Ancient East, and Arklow is perfectly located on the East Coast, serviced perfectly by the M11 running adjacent to our client's lands, and centrally located between the ports of Dublin and Rosslare.



Figure 4 – Ireland's Ancient East (Bord Fáilte Map)

Arklow has not been considered a tourism destination as such to date, despite being under a 100km distance to the capital Dublin City, and equally within a stones throw of the beautiful and historic countryside of Wexford and Wicklow.

If the development of our clients were to be able to proceed, this substantial tourism and leisure complex would provide a fantastic anchor for the town of Arklow to develop the Tourism industry in the immediate area. There is no other site currently zoned in either the current *Arklow Town and Environs Development Plan 2011-2017*, or indeed the *DRAFT Arklow & Environs Local Area Plan 2017-2023* that would be suitable or capable of providing this kind of investment for the Arklow area.

It's position within the environs of Arklow keeps it relevant to the town and the residents of the area, but being located directly adjacent to the M11 with such abundant road links to the rest of the country means that it will be ideally located to facilitate the type of visitor numbers and traffic that would be envisaged might be generated as a result.

The written document of the *DRAFT Arklow & Environs Local Area Plan 2017-2023* itself states in its **Vision for Arklow and Environs** the following in relation to Tourism:

7 ENHANCE TOURISM

'To develop the tourism potential of the area as a visitor / tourist destination in itself and in its role as a 'gateway' to surrounding attractions.'

The overall strategy as outlined in the *DRAFT Arklow & Environs Local Area Plan 2017-2023* itself states also that it is an **Economic Development and Employment Strategy** to:

'Promote tourist developments at suitable locations that are of an appropriate scale and design, particularly developments that are associated with the tourism products or themes associated with Arklow and its hinterland and maximise the town's location as a destination and gateway between other nearby tourism assets.'

5. POTENTIAL FUTURE OF THESE LANDS AT BALLYNATTIN, ARKLOW:

Since this time, Mr. Balfe has been working very hard to secure the appropriate operator for this tourism and leisure development, and with it the funds to proceed.

It is Mr. Balfe's intention to reapply for planning permission in the very near future for a very similar development, however this will not be possible if the *DRAFT Arklow & Environs Local Area Plan 2017-2023* is not recitified to allow the zoning currently on these lands remain, and the lands to remain within the bounds of the Arklow and Environs area as delineated on the maps.

In recent months, Mr. Balfe has engaged in detailed and advanced discussions with the very successful **Moran Hotel Group** in relation to this development on these lands with a view to moving the development forward again. As part of this submission, the Irish owned and operated Moran Hotel Group have provided Mr. Balfe with a letter for inclusion with this submission.

Please see attached letter from Mr. Michael Moran of the **Moran Hotel Group** outlining this intent to become involved in this entire development once it proceeds.



RED COW
MORAN HOTEL
DUBLIN

Red Cow Complex, Nass Road, Dublin 22
Tel: +353 (0)1 459 4650 Fax: +353 (0)1 459 4568
Email: redcowinfo@moranhotel.com
www.redcowmoranhotel.com

Myles Balfe
25 Phibsborough Rd,
Phibsborough,
Dublin, 7

14 August 2017

Myles, thank you for taking the time to give me a tour of your lands at Ballynattin Arklow Co. Wicklow. I would strongly urge you to proceed with renewing your planning application for a mixed use scheme to include a 4-star hotel, conference centre, recreational amenities and residential units.

The Moran hotel group would like to register its interest in Ballynattin and would be keen to issue you with a formal letter of offer for the entire once planning is delivered.

Please keep me informed of your progress.

Kind Regards

Michael Moran

Director

6. CONCLUSION:

Chapter 8 of the *DRAFT Arklow & Environs Local Area Plan 2017-2023* relates directly to the Tourism and Recreation strategy of the LAP going forward.

It specifically states:

'With regard to the development of tourism within the settlement, work still needs to be done to define and publicise the overall tourism and recreation product on offer and provide support tourist infrastructure such as parking, signage, walks etc in order that the full benefit can be felt around the town and visitors can be attracted to stay longer in the area. Furthermore, the proximity of Arklow to Brittas Bay beach and the key tourist destinations of Avoca, the Meeting of the Waters, and south-west Wicklow mean that Arklow could act as the principal tourism 'gateway' in this region, and capitalise on spin offs associated with this role such as providing an additional hotel and other accommodation services and as a starting point for tours of the area (with potential link up to rail services). In these regards, it is an objective of this plan that other tourism accommodation development will be supported, as well as the provision of tourist infrastructure such as car / coach parks and walking routes through the town.'

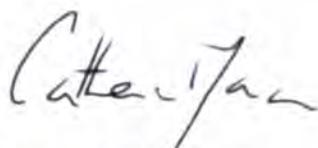
This proposal to de-zone our client's lands from a Tourism use which clearly meets these requirements, has proven to be capable of accommodating a large scale tourism and recreational complex as was carefully detailed in the proposed development previously granted permission on the site, and which has been demonstrated now has commercial interest from a Hotel operator to move forward with is non-sensical.

The result of these proposed changes to the *Arklow & Environs Local Area Plan 2017-2023* going forward, relating specifically to these lands at Ballynattin in the ownership of our client Mr. Myles Balfe could not be more stark.

If this amendment to the *Arklow and Environs Local Area Plan 2017-2023* is allowed to proceed, then the clear development potential of these lands will be lost, and with it the loss of substantial and sustainable long term economic investment in the Arklow area, and the loss of hundreds of potential jobs.

We would respectfully urgently appeal to Wicklow County Council, County Councillors, The County Manager and the Forward Planning Department to immediately reconsider these changes proposed, and to allow the zoning to remain as is currently the status quo to these lands at Ballynattin, and for the boundary delineating *Arklow and Environs* area to be rectified to continue to include this area.

Yours sincerely,



Catherine Mara - MRIA
MARA Architects

Cc. Mr. Myles Balfe

Ph: 01 8878695

JOHN L. O'HANLON & ASSOCIATES
Architectural and Engineering Design
And Project Management
69 Lower Main Street, Arklow, Co. Wicklow
Tel 0402-23027 Mobile 086 8916318
E-Mail jloh@eircom.net

Vat No IE1510356S

19th July 2017

Submission to the Draft Arklow and Environs Local Area Plan 2017-2023
On behalf of Danny & Shane Bermingham

A Chara,

I write to request that you review and change the zoning proposed in your Draft Plan (copy map attached – Map No. 2). I also attach map showing my clients land edged in pink – Map No. 1.

In the interest of proper planning and development the Community, Educational and Open Space allocation should be closer to existing residential development and shared by all land owners in the area, as was the case in the Arklow Town Development Plan 2005-2011 (copy map attached – Map No. 3).

The Arklow Town and Environs Plan 2011-2017 (copy attached – Map No. 4) designated the area at Tinahask as “Action Area” where the Community, Educational and Open Space allocation would be agreed and shared between neighbouring land owners in any future development proposal for this Action Area. There was no specific delineation or colour coding for the Community, Education and Open Space in the 2011-2017 plan. This was fair and equitable for all land owners in this area.


The proposed draft plan for 2017-2023 has reintroduced the colour coding for Community, Educational and Open Space and moved its location from its position in the 2005-2011 plan further out and away from existing residential development for which it is designated to serve.

A large portion of this Community, Educational and Open Space is now proposed for my clients land. This location is much further away from the existing residential development. If the current draft plan is adopted and the Community, Educational and Open Space allocation is moved, this would have a seriously negative and disproportionate effect on my clients land as well as being negative from the point of provision of the services relating to Community, Educational and Open Space zoning close to existing residential development.

I would ask that you leave the zoning in this entire area as “Action Area” so that the Community, Educational and Open Space provision can be agreed equitably between the land owners in this “Action Area” prior to any future development of lands within this “Action Area”. Please note in plans prior to 2005 my clients lands were zoned residential in their entirety.

Thank you for your consideration.

Yours Sincerely,


John O'Hanlon Dip Eng MIEI

WICKLOW COUNTY COUNCIL
20 JUL 2017
PLANNING DEPT.

Map No. 1

My Clients Land Edged in Pink



ST. GEORGE'S CHANNEL

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REVISION.	DATE	DETAILS
JOHN L.O'HANLON & ASSOC. Engineering Design and Project Management 69 Lr. MAIN ST. ARKLOW Co. WICKLOW E mail. joh@eircom.net tel .0402 23027 fax .0402 23027		
CLIENT : <u>DANNY AND SHANE BERMINGHAM</u>		
TITLE : ZONING SUBMISSION TO DRAFT ARKLOW AND ENVIRONS LOCAL AREA PLAN SITE MAP OF APPLICANT'S LAND		
DRN	JLOH	SCALE
DATE	19.7.17	1:5000
DWG. No. 904C01		REV.



MAP No 2

PLEASE REVERT
TO HATCHED
DESIGNATION
FOR AA 1

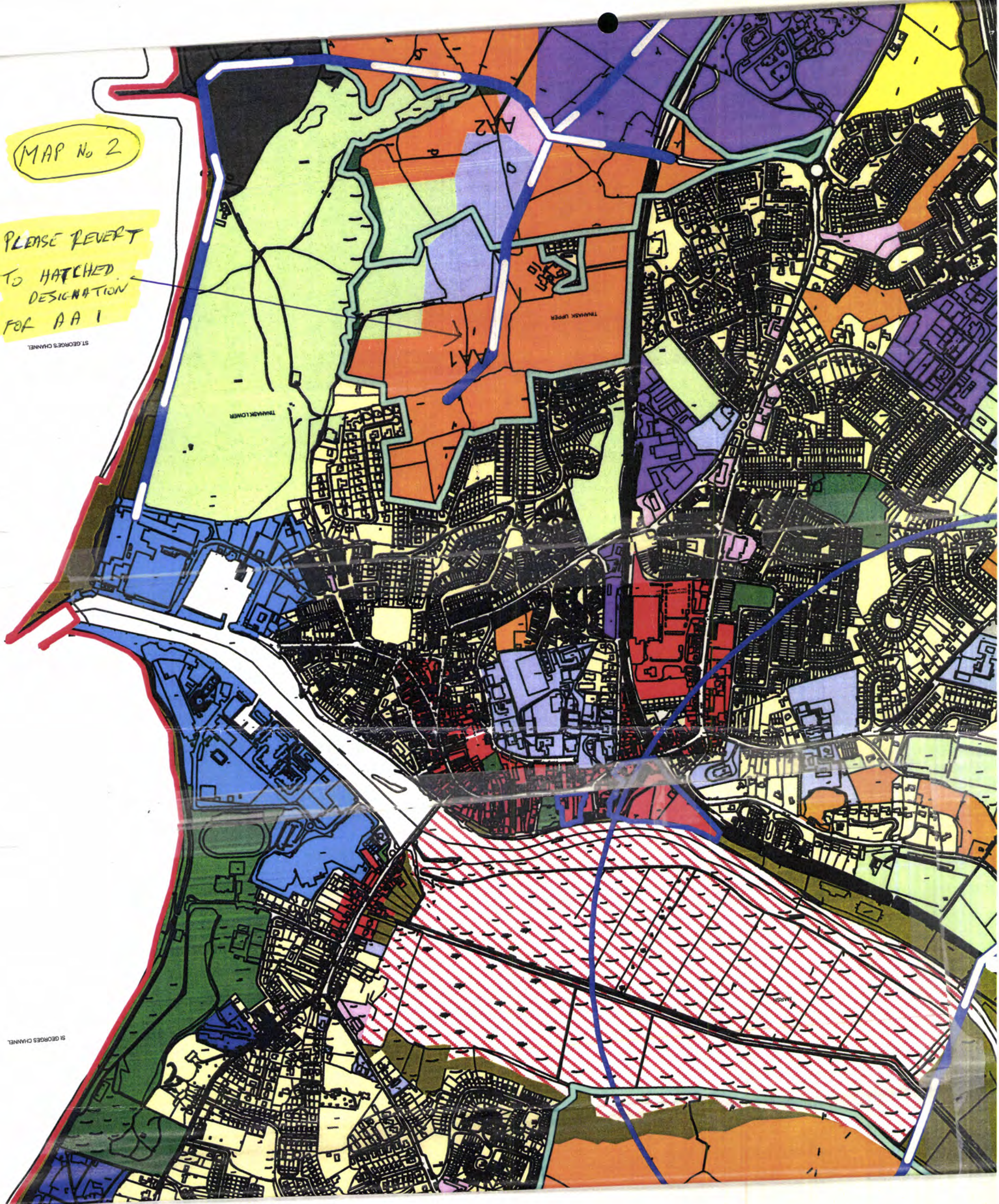
ST GEORGES CHANNEL

TRAVASK LOWER

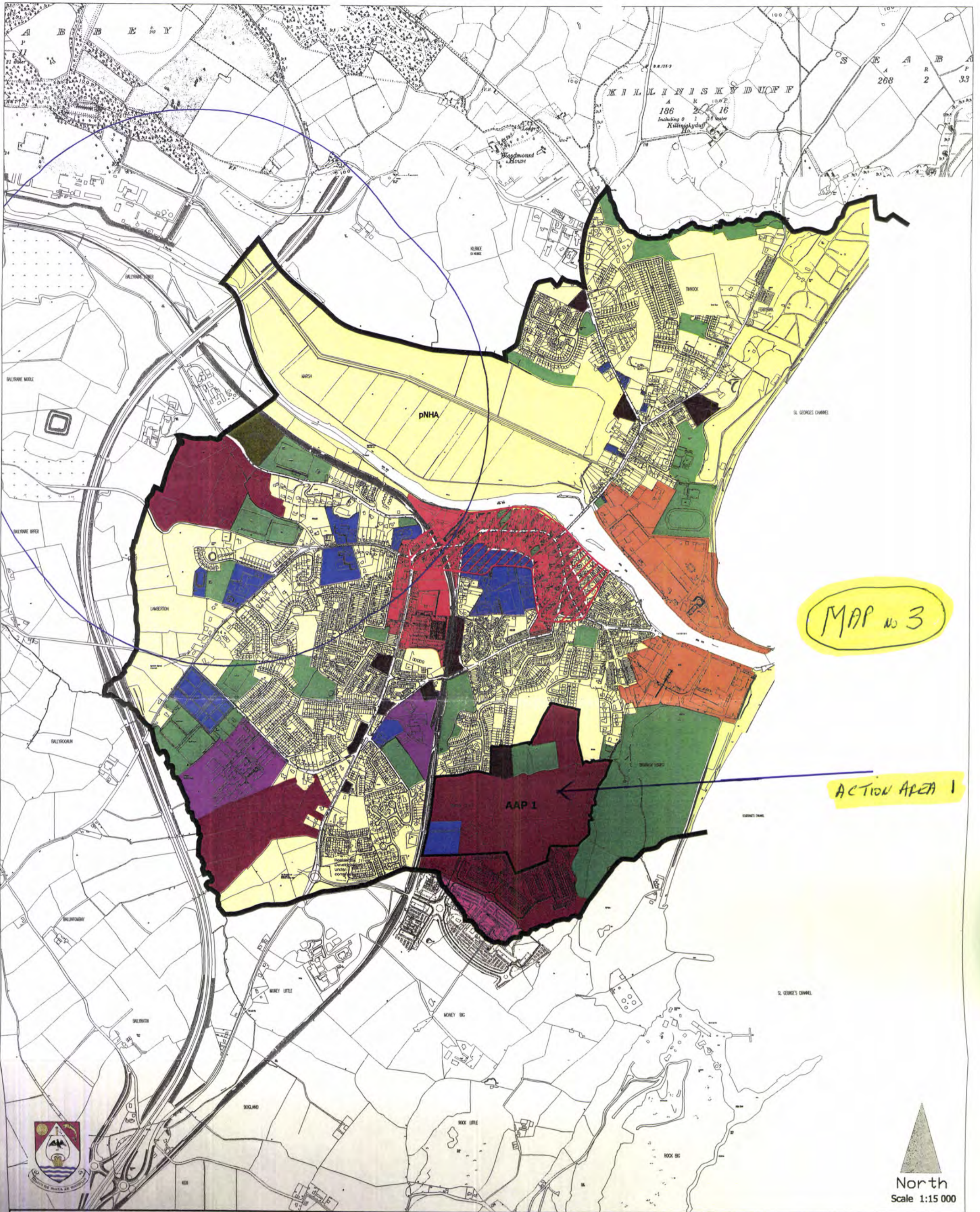
TRAVASK UPPER

AA2

AA1



ST GEORGES CHANNEL



MAP NO 3

ACTION AREA 1

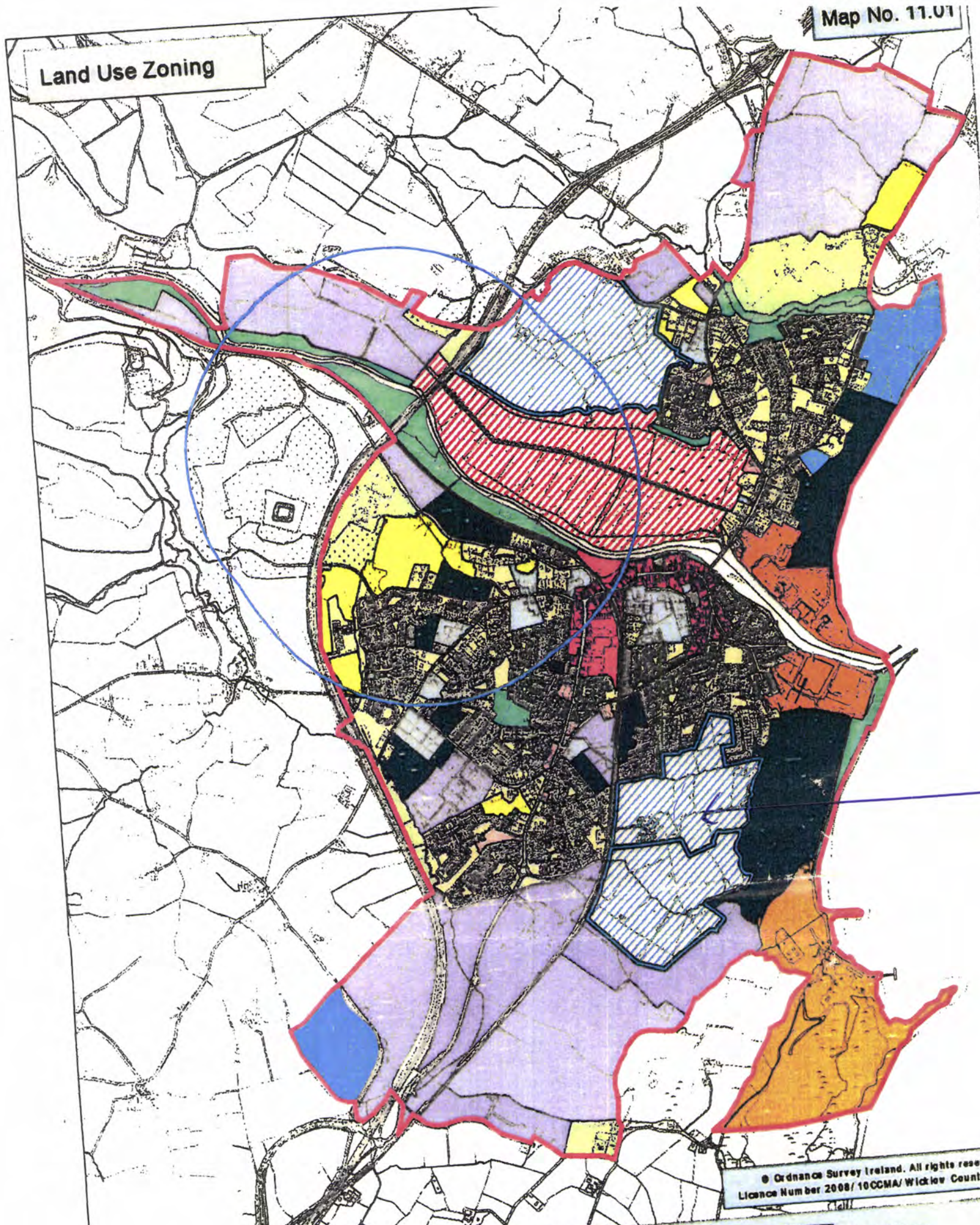


North
Scale 1:15 000

ARKLOW TOWN DEVELOPMENT PLAN 2005-2011 MAP I ZONING MAP

Urban District Boundary	C - Commercial	CF - Community/Education/Institutional	ZAP - Zone of Archaeological Potential	pNHA - Proposed Natural Heritage Area
RA - Existing Residential	I - Industrial	AG - Agriculture	1,000 Metres Consultation Distance from Honeywell Iropharm Plc Site Boundary (Seveso II)	
RB - New Residential	LB - Light Industrial	AM - Natural Amenity	Action Area Plan	
TC - Town Centre	WDZ - Waterfront Development Zone	OS - Open Space		

Land Use Zoning



MAP NO 4

"ACTION AREA" (HATCHED)

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Employment (E2)	Tourism	Agriculture
Existing Residential	New Residential	Utilities
Amenity	Community/Education /Institutional	Quarry
Waterfront Zone	Employment (E1)	Action Area
Active Open Space	Town Centre	1,000 Metres Consultation Distance from SEVESO site
Neighbourhood Services	Conservation Zone	



Leonora Earls

From: Patricia Brennan [
Sent: 17 August 2017 17:26
To: Planning - Plan Review
Subject: Arklow LAP
Attachments: Arklow LAP - Transport submission.pdf

Dear Sirs,

Please find attached a submission in relation to Arklow LAP.

I hope I have explained my ideas. If you would like to contact me for any further clarification, I would welcome the opportunity to discuss it with you.

Yours sincerely,

Patsy Brennan
Tern Cove,
Sea Road,
Arklow
Ph: 086 3743054



DRAFT LOCAL AREA PLAN ARKLOW 2017

PUBLIC CONSULTATION PROCESS

I wish to submit the following observations on the proposed plan.

My recommendations are in relation to transport. I have studied the plan in detail and wish to make the following suggestions.

The current proposed plan does very little to alleviate transport coming from north through the town.

The Dublin Road is bumper to bumper from 3 to 6 Monday to Friday, once school ends and commuters arrive back to Arklow, and from midday at weekends, as people travel to Bridgewater. While I welcome the new developments and population the road planning should be revisited.

When travelling in / through the town, besides going to their homes, where are people going from / to:

Bridgewater,
Main St - both banks, Post Office,
Library
Garda Station
Health clinic
Doctors -Ferrybank, Bradshaws Lane, St Mary's Road.
Tesco / Supervalu- Wexford Road
Schools
Arklow Bay Hotel
Coral Leisure – Seaview Ave
Pubs / Restaurants -

There is no proposed road to alleviate / support this traffic.

IT2 & IT4

Both of these are improvements to current roads which are already congested prior to construction of any new developments.

Improvements are welcome but still inadequate to support increase in volume of traffic.

IT5 – If I currently want to travel from Kilbride in the north of the town to Knockenrahan / Emoclew in the south, I would slip on and off the M11.

I could travel at 120km an hour and have no traffic delays compared to bumper to bumper through the town.

There is probably a bye-law where this is not allowed but it would be very hard to enforce it. The proposed IT5 is running parallel to M11, just to the East of it.

No one from the east of the town would travel that far west to access that road. They would just take the existing old Dublin Road or the M11.

This is where the first part of my proposal is involved.

IT5 should not be just a western link road. Then it can only be fed from traffic on one side – the east. Far more effective if it could be fed from both sides.

As IT5 leaves Kilbride it should be through the centre of the proposed developments.

Then as it reaches the marsh to the north of the river it could link with the old Ferrybank / Shelton road.

There is a road that runs through the marsh. 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.

However, this would be my second recommendation.

MOVE THE TRAIN LINE FROM INSIDE THE M11.

Use the train route as new road through the town. It travels in the vale road, cuts right through the town, goes at the back of Tesco, and travels straight through the proposed developments south of the town. It could not be better situated. This new road could also have a cycle track. If you look at the train line on google maps, you can see how perfectly placed the train line is for this new road.

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 not just from south Wicklow but also north Wexford. Iarnrod Eireann could even consider have one station at north of town and another at the south.

This new proposed track could also be a double track. At the moment the Dublin – Rosslare route is a single track and trains have to meet in a station. If one is delayed, so is the other. This double track would mean that trains could pass each other while travelling rather than waiting in station, leading to more efficiency.

This would also 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.

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. This southern port access road could link to the new train station at Kish and goods to / from could be transported by train.

IT6, IT7 & IT9 would still be valid and connect very well with this new proposed IT5 on the train line.

IT11 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.

Lisa Rothwell

From: Trevor Sadler [trevor@mcgplanning.ie]
Sent: 18 August 2017 13:55
To: Planning - Plan Review
Subject: Submission to Draft Arklow LAP 2017
Attachments: Arklow LAP 2017 - Submission in relation to lands at Kilbride 18.08.17.pdf

To Whom It Concerns

Please find attached submission to the Draft Arklow LAP 2017 on behalf of the Receiver for Dawnhill Properties Limited (In Statutory Receivership) and Windhill Properties Limited (In Statutory Receivership), which owns and controls a significant landbank located at Kilbride, Arklow.

I would appreciate if you could confirm receipt by return email.

Regards

Trevor Sadler
Director
McGill Planning Ltd.
7 Fitzwilliam Street Upper
Dublin 2

Email: trevor@mcgplanning.ie
Tel: (01) 2846464
Mob: (087) 7800572
Website: www.mcgplanning.ie
Twitter: @McGillPlanning

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Administrative Officer,
Planning Department,
Wicklow County Council,
Whitegates,
Wicklow Town

18th August 2017

RE: Draft Arklow Local Area Plan (LAP) 2017

Dear Sir/Madam,

We are instructed by our client, The Receiver for Dawnhill Properties Limited (In Statutory Receivership) and Windhill Properties Limited (In Statutory Receivership), which owns and controls a significant landbank located at Kilbride, Arklow, to make this submission on the Draft Arklow and Environs Local Area Plan (LAP) 2017, issued on 5th July 2017.

The Kilbride lands within our client's ownership extend to approximately 77 hectares (190 acres).

Figure 1
Aerial map showing client's lands in red & AA3 in blue



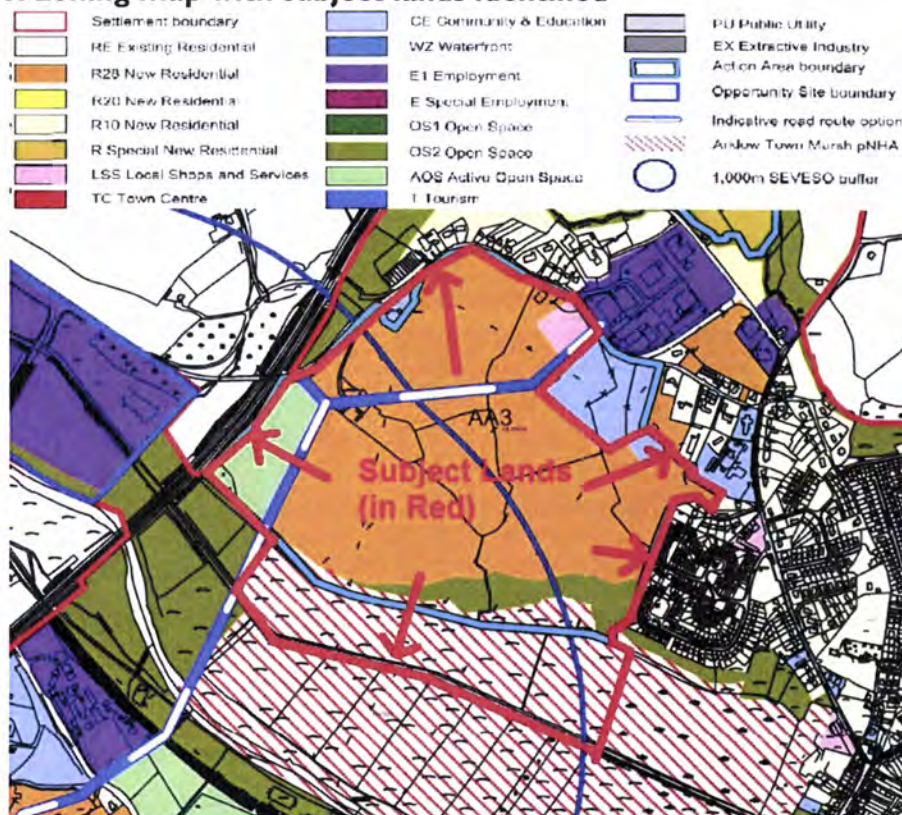
Our client firstly wishes to record their broad support for the Draft LAP and the objectives for the Kilbride lands in particular which generally align with their ambitions to progress development of these lands over the coming years.

The majority of our client's landholding is located within Kilbride Action Area 3 (AA3).

Kilbride AA3 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 is controlled by our client.

Our client also owns the area zoned for "Local Shops and Services" which will also provide complementary small scale local neighbourhood shops and services.

Figure 2
Extract of zoning map with subject lands identified



Our client 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.

The positive draft LAP, the quantum and mix of zonings proposed, in tandem with the significant recovery of the residential housing market, has led our client to earmark this landbank for development in the short to medium term. The first objective will be to prepare a comprehensive Action Area Plan/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 the County Council 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.

Our client then intends to proceed to planning (within the coming year) for a Phase I residential led scheme on the northern/eastern portion of these lands adjacent to existing residential areas and the identified school site.

In addition to recording their support for the draft LAP our client would like to raise the following matters which it is hoped could be addressed in the next draft of LAP to be adopted:

1. The Draft LAP zones 5.4ha of land for *CE Community & Education* within AA3 in order to provide a future school site. We note that the Department of Education recently purchased 5ha of our client'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. Our client therefore requests that this area be rezoned *R28 New Residential* as per the adjoining landbank.

Figure 3
Extract of legal map indicating 5ha purchased by the Department of Education



Figure 4
Extract of zoning map indicating 0.4ha area requested to be rezoned to R28 New Residential



2. As noted above our client controls a significant portion (c.15ha / 37 acres) of the adjoining Arklow Marsh to the south which is currently outside the AA3 area (see Figures 1 and 2 above). It is requested that the AA3 be extended to include this area thus ensuring that all of our client'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.

3. Our client fully supports the objective of providing a wide range of residential estate designs. However we 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.

We trust that the planning authority will take on board this letter of support and supplementary comments. We look forward to the adoption of the LAP in due course and to working closely with Wicklow County Council in agreeing an Action Area Plan for Kilbride and delivering significant new development for the town in the near future.

Yours

Trevor Sadler
McGill Planning Limited

Leonora Earls

From: Julie kenny
Sent: 18 August 2017 11:48
To: Planning - Plan Review
Subject: SUBMISSION UNDER DRAFT ARKLOW & ENVIRONS LOCAL AREA DRAFT PLAN - ORIGINAL TO FOLLOW IN INTERNAL POST.
Attachments: 00206B8DFF45170818105048.pdf



Lamberton Lodge

ARKLOW

Co Wicklow

14th August 2017

Arklow and Environs

Local Area Plan

2017

Dear Sir,

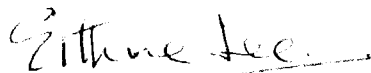
When I viewed the Arklow town development plans on Thursday 20th July I noticed on one of the large maps there was a proposal for a major road from Kilbride/Beech road area to the Ballyduf/Coolgreaney road area.

This road is to cross the old avenue to Glenart forest roughly at the Ballyrairie path where the barrier is. This is the main way into the forest for everyone from the town and we feel it is imperative that there is always PERESTRIAN and vehicle access to the forest without crossing a major road.

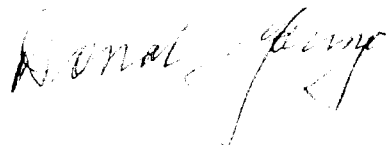
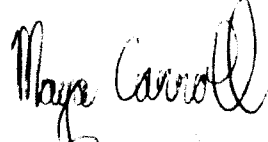

We, the Friends of Glenart feel the forest is a huge asset to the town and must remain assessable for everyone to enjoy.

Yours sincerely

Eithne Lee



Friends of Glenart



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Local Area Plan
2017

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We, the Friends of Glenart feel the forest is a huge asset to the town and must remain assessable for everyone to enjoy.

Yours sincerely

Eithne Lee



Friends of Glenart



WICKLOW COUNTY COUNCIL

16 AUG 2017

ARKLOW AND ENVIRONS LOCAL AREA PLAN 2017-2023

DRAFT PLAN STAGE

AUGUST 2017



WICKLOW COUNTY COUNCIL
 18 AUG 2017
 PLANNING DEPT.

SUBMISSION ON BEHALF OF

GERARD GANNON PROPERTIES

KINVARA HOUSE, NORTHUMBERLAND ROAD, DUBLIN 4

CONNOLLY  ARCHITECTS

15 YACHTSMANS POINT, DUNBUR, WICKLOW TOWN

Tel 04040 66575

info@connollyarchitects.ie

INTRODUCTION

Gerrard Gannon Properties are the owners of a substantial Development Site of circa 39.6 hectares at Tinahask / Moneybig known as Arklow South. It is the wish and intent of our clients 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.

RESPONSE TO DRAFT LOCAL AREA PLAN

In general, our clients welcome the Draft Development Plan as published. The plan will allow for the sustainable development of Arklow and will permit an orderly disposition of our clients' lands. In particular, we welcome the flexibility afforded in the type of scale of development allowable

We highlight in our submission below several issues which may arise from the plan. We request that Wicklow County Council address these concerns and where appropriate amend the LAP.

SUBMISSION – REVIEW OF LOCAL AREA PLAN

ZONING

We 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 Local Area Plan. 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.

We therefore request that the planning authority increase the land available for medium and long term residential development in AA1 And AA2 by up to 5 hectares with a consequent reduction in the Employment zoning.

In the same context, we ask that the final plan make provision be made for a larger Neighbourhood Centre to service the significant population which will be resident within the Action Areas and at Arklow South

PHASING OF DEVELOPMENT

The LAP correctly envisages phased Development of Action Areas AA1 And AA2. It is acknowledged that overall Action Area Plans must be agreed for the lands prior to individual or separate planning applications being made. This however restricts the immediate potential of part of the site.

Our clients made an application under Plan Ref.16/31 for a small housing development on a triangular section of 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.

We therefore request that the wording of the LAP Page 55 be reviewed to ensure that a small development could take place before final agreement on the Action Area Plan which will be influenced and possibly delayed by issues surrounding the delivery of the proposed Arklow Waste Water Treatment Plant.

RESIDENTIAL DENSITY.

The plan allows for the Zoning of New Residential developments on the land under Designation R28 and R20. These provide for up to 28 and 20 units per hectare respectively. It has been our clients recent experience that these densities are considered too low by An Bord Pleanála.

Our client recently obtained a Decision to Grant Permission for a development on the edge of Gorey Town in County Wexford. This decision was refused by An Bord Pleanala Reference PL26.448159 primarily on the grounds that the density did not comply with DEHLG Guidelines on Residential Density. The refusal decision was subsequently 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 per hectare and that in no circumstances should it fall below 30 per hectare.

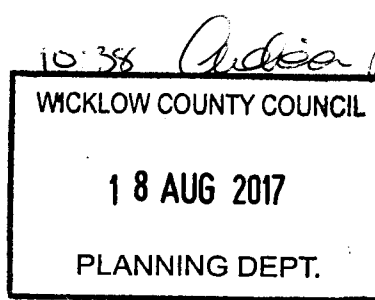
We are therefore of the view that the Local Area Plan should allow for development at a residential density which would be considered appropriate by An Bord Pleanala who can be expected to review any proposed developments. Based on our recent experience a designation of R30 (30 per ha.) may be prudent.

CONCLUSION

Our clients trust that their views will be fully considered and would welcome further consultation and engagement with the Planning Authority while their review and adoption of the Arklow and Environs Local Area Plan.

CONNOLLY ARCHITECTS

18th August 2017



Tel: (086) 8891862
ian@heffernancivilengineers.ie
Cnoc Dubh,
Ballymanus Lower,
Blackhill,
Glenealy,
Co. Wicklow



Administrative Officer
Planning Section
Wicklow County Council
County Buildings
Station Road
Wicklow Town

Date: 17-08-17

B12

DRAFT Arklow and Environs Local Area Plan 2017-2023

10.92 hectares of Lands at Killiniskyduff, Arklow, Co Wicklow

A Chara,

In relation to the preparation of the Arklow Town and Environs Development Plan 2017-2023, I would like to make a submission on behalf of the owners of lands at the above address. Please find enclosed an ordnance map outlining the 10.92 hectare lands in question.

Under the current Arklow Environs Plan 2011 – 2017, these lands are currently zoned “New Residential” and “Employment (E2)”

Under the proposed New Arklow Environs Plan 2017-2023, these lands will be omitted from the local area plan altogether and completely de-zoned.

As a result, our client’s request that the subject lands be included in the town boundaries and zoned as “Low Density Residential”

Proposed Residential Zoning

The subject lands have been included within the town boundaries for the past 2 consecutive local environ plans and our client cannot understand why the town boundaries would now suddenly change and their land excluded altogether. It appears that lands at Coolboy (Action Area 4) on the Beech Road have now been included at the expense of the lands to the north of the town where our client’s land is situated.



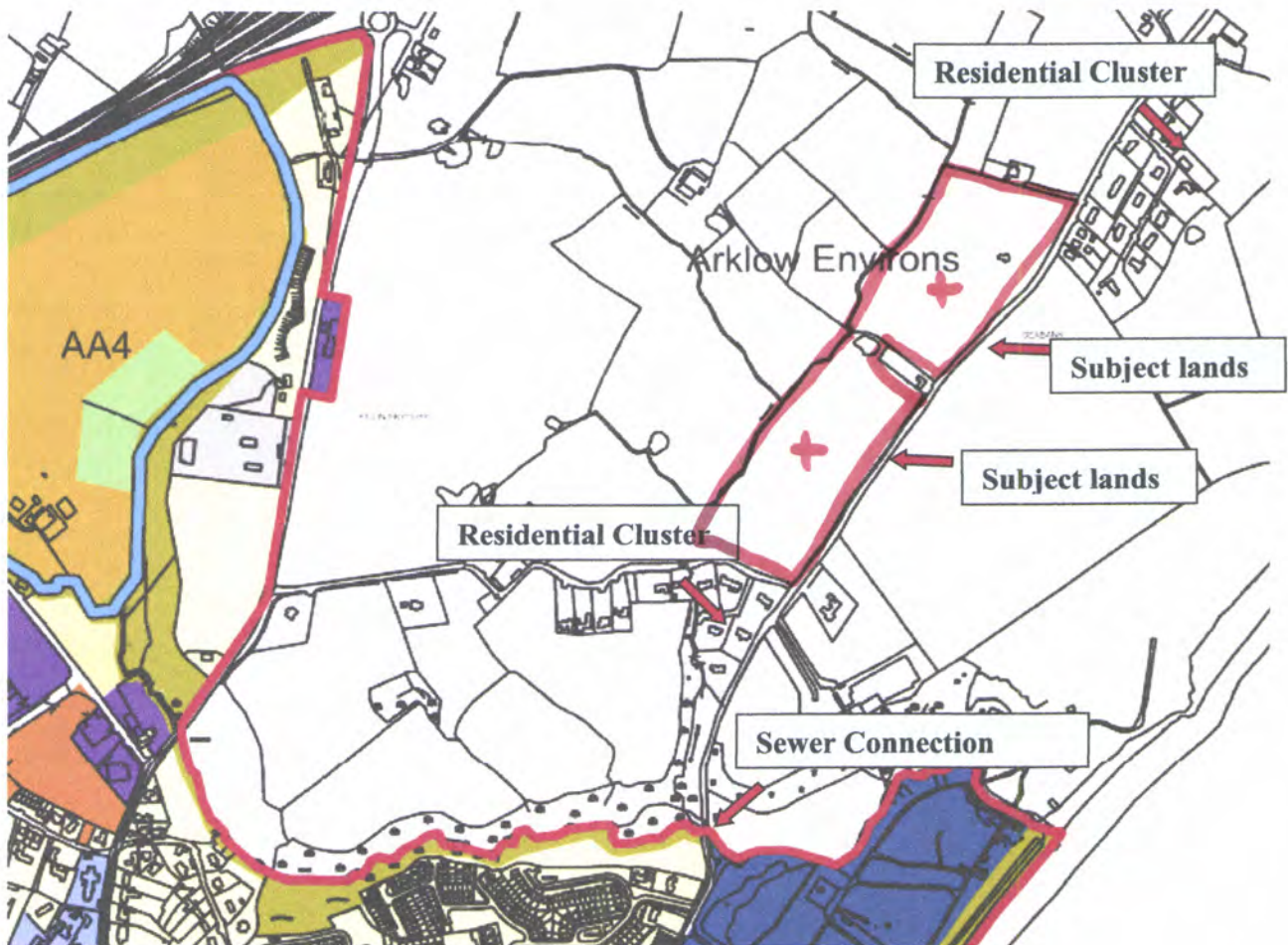
It should be noted that previous action plan areas outlined in the current and previous environ plans have never been developed in the lifetime of any of the plans and now the council addition of another area action plan 4 at what appears to be at the expense of our client's land would also appear to be very optimistic rather than a pragmatic achievement.

Under the proposed local area plan, the only residential zoned land to the north of the town is centred on the AA3 & AA4 lands which would require major infrastructural expenditure to develop in the future and is highly unlikely to be developed in the lifetime of the new plan.

Residential Objective H8 also states that *“lands at Tinahask (Action Areas 1 & 2), Kilbride (Action Area 3) and Coolboy (AA4) shall be developed as comprehensive (not piecemeal) integrated schemes that allow for the sustainable phased and managed development of each action area during the plan period.”*

As a result, the majority of zoned residential lands to the north of the river will only materialise if a large scale development is proposed for the area.

On the other hand, to zone the subject lands as low density residential would complement the existing residential area and would not adversely impact on the existing road network. Subject to the construction of a temporary treatment plant to connect to the existing sewer network, the site would have the infrastructure in place to realistically achieve development in the lifetime of the local area plan in an economical and sustainable manner.



Site Location

The subject site consists of 10.92 hectares of lands and is located 1km from Arklow's town centre.

The site is located to north of Arklow Town at junction between Killiniskyduff road and Sea road in a rural area with predominately residential and agricultural land uses surrounding the site.

As per chapter 2, Overall Development Strategy of the DRAFT local environs plan, it states that house zoning provisions have been implemented based on the following principles:

- Application of the 'sequential approach' whereby zoning extends outwards from the centre, contiguous to the existing built up part of the settlement; The subject lands are only 1 km from the town centre and located between two existing residential settlements.

- promotion of the concept of 'walkable' neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized; *The subject lands meets this criteria The owners are prepared to construct a pedestrian path from the site to meet the existing public path which ends at Webbs river. This is a distance of approx 500metres.*
- promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail stop or 500m of bus routes will be prioritised; *The subject lands meets this criteria.*
- lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized; *Please see site services section below.*
- cognisance will be taken of the need to provide utmost protection to the environment and heritage, particularly of designated sites, features and buildings; *Any development on the lands will retain the existing natural road frontage boundary to protect the natural environment and visual amenity of the area.*
- promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones. *The subject lands are located 1 km from local schools and 500 metres from open space zoned lands (Beech)*

The above highlights that the subject lands meet the residential zoning objectives far more than the new Action Area 4.

Site Services

The subject lands have close access to the mains water, electricity, gas and telecom services and the council mains sewer is located approximately 500 metres away down gradient at Webbs river close to the Cluain Ard housing estate entrance.

As it is proposed to be low density residential, there is sufficient land available to construct a temporary treatment plant that can then be gravity fed to the existing mains sewer at Webbs River. This proposed sewer line could also accommodate the existing residential settlements in the locality which all have individual septic tanks.



Tel: (086) 8891862
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Cnoc Dubh,
Ballymanus Lower,
Blackhill,
Glenealy,
Co.Wicklow



Site Access

The subject lands have full road frontage and are accessible from the town centre via the Sea road and there is a link road from the M11 motorway via Loves lane. Please note that all approach roads have been upgraded and widened in 2016.

Proposed Development

Due to its proximity to existing residential homes, our client's request that the subject lands be included in the town boundaries and zoned as "Low Density Residential"

To zone the subject lands as low density residential would allow for a cluster development that would complement the existing residential area and would not adversely impact on the existing road network.

In terms of

- Topography (Views and Prospects, Not Flood prone area)
- Siting (location to surrounding built environment)
- Road infrastructure
- Waste water services(Subject to Sewage Treat plant)
- Tourism
- Community facilities

This subject site offers a realistic choice of lands that can be developed in the lifetime of the new local environs plan.

It should be noted that the new owners of this land are ready to submit a new application for a low density residential development in 2018. They held back submitting until now due to the relocation of the proposed town treatment plant which was proposed for Seabank but has since gone back out for re-design.

It would be proposed that a temporary treatment plant with gravity feed to the main sewer (similar to Meadowvale Estate) would be proposed which will allow for the development to proceed while not increasing the non-treated effluent loading on the existing sewer network.

We request that our views are considered in the preparation of the new local environs plan and that the subject site be zoned as low density residential.

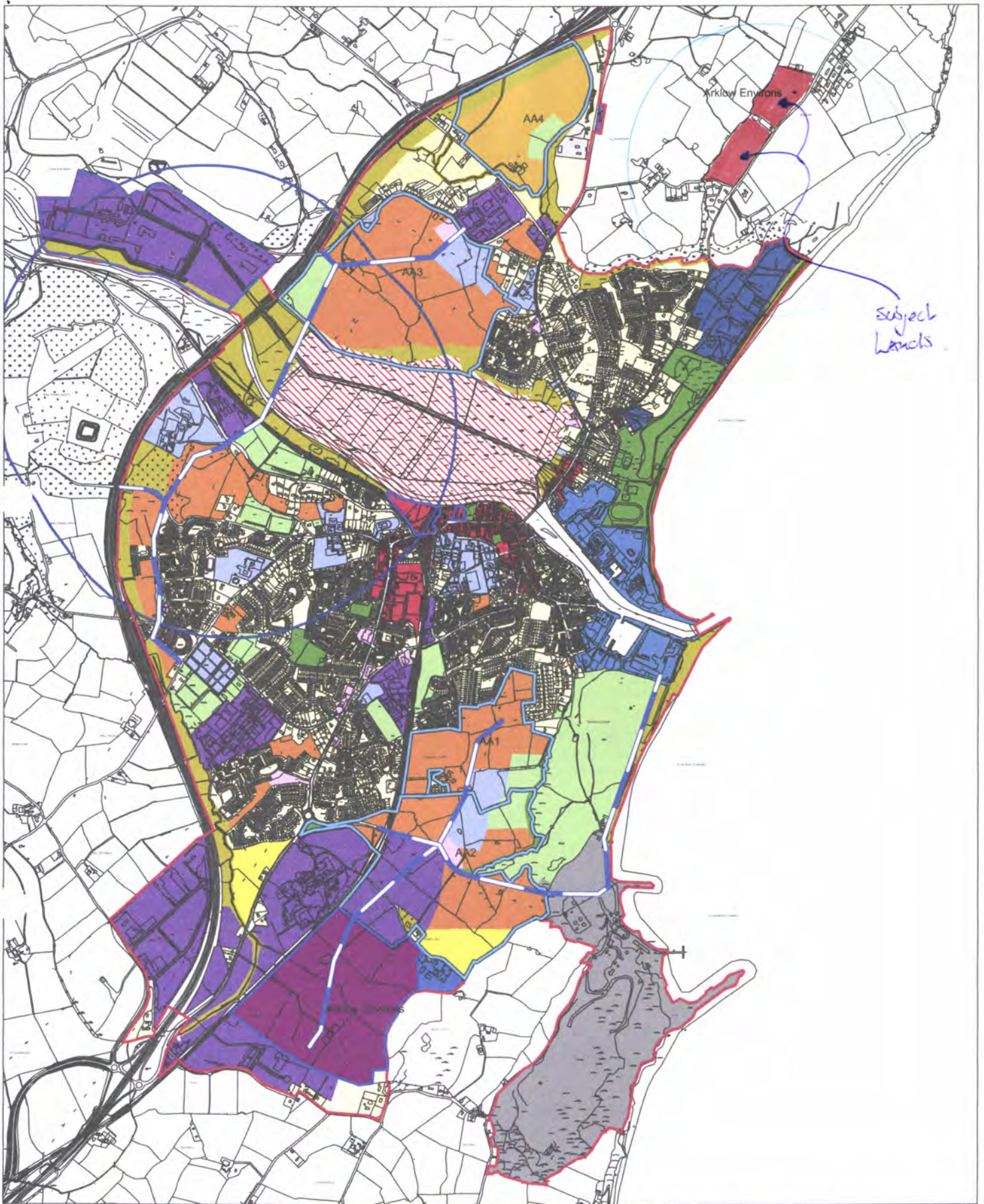
I can confirm also that I am a fully qualified Civil Engineer (Degree gained from DIT Bolton Street) and I am also a qualified site assessor having completed the Site Assessors Course with FAS. I am also a member of The Institute of Engineers Ireland.

We trust that the above is in order and if you require any further information please do not hesitate to contact the undersigned.

Yours Sincerely

Ian Heffernan

Ian Heffernan BEng, M.I.E.I, Fetac Certified Site Assessor, Project Manager.



WICKLOW COUNTY DEVELOPMENT PLAN 2016-2022
DRAFT
 Arklow and Environs Local Area Plan
 2017 - 2023

Title: Land Use Zoning Objectives
 Map No. : 1



Wicklow County Council
 Planning Department

Maps are not to scale

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	Settlement boundary		CE Community & Education		PU Public Utility
	RE Existing Residential		WZ Waterfront		EX Extractive Industry
	R28 New Residential		E1 Employment		Action Area boundary
	R20 New Residential		E Special Employment		Opportunity Site boundary
	R10 New Residential		OS1 Open Space		Indicative road route option
	R Special New Residential		OS2 Open Space		Arklow Town Marsh pNHA
	LSS Local Shops and Services		AOS Active Open Space		1,000m SEVESO buffer
	TC Town Centre		T Tourism		

Acknowledged!

Leonora Earls

From: Malcolm Lane [malcolm.lane@pdlane.ie]
Sent: 03 August 2017 15:20
To: Planning - Plan Review
Cc: Leonora Earls
Subject: draft Arklow & Environs LAP 2017
Attachments: draft Arklow Environs LAP submission 2017.pdf; LAP Submission Map Aug 2017.pdf

B13

Dear Sir / Madam,

See attached submission report and map in response to the draft LAP,
on behalf of **Edmund Holfeld / Avoca River Park Ltd.**

Yours Sincerely

Malcolm Lane
PD Lane Associates

BA MRUP MA(UD) MIPI MUDG
own Planner & Urban Designer

malcolm.lane@pdlane.ie
T.direct +353 1 287 3630

1 Church Road	T +353 1 287 6697	architecture
Greystones	F +353 1 287 0109	urban design
Co.Wicklow	E info@pdlane.ie	planning
Ireland	W www.pdlane.ie	engineering



**Draft Arklow & Environs
Local Area Plan
2017-2023**

SUBMISSION TO:

Wicklow County Council

ON BEHALF OF:

**Edmund Holfeld / Avoca River Park Ltd
'Avoca River Park'
Former IFI Facility
Shelton Abbey, Arklow
Co. Wicklow**

BY:

**PD Lane Associates
Architecture & Planning
Urban Design & Engineering
1 Church Road, Greystones,
Co. Wicklow**

August 2017

GROUNDS OF SUBMISSION

Wicklow County Council has produced the draft Arklow & Environs Local Area Plan for the period 2017-2023 ('Arklow draft LAP'). This submission is being made on the strength of the publication of this draft LAP on behalf of Edmund Holfeld / Avoca River Park Ltd. The attached map identifies the total landholding in the ownership of Edmund Holfeld / Avoca River Park Ltd (outlined in red). The landholding is the site of the former IFI facility.

We would like to bring to the attention of Wicklow County Council that Edmund Holfeld / Avoca River Park Ltd have gone to great lengths and expense to clean up and make good this facility over the last number of years at a cost of several million euros. Avoca River Park currently employs approximately 365 people (there was no employment on site when Edmund Holfeld took possession of the lands). It is anticipated that current employment levels are set to increase substantially at Avoca River Park in coming years.

There have been several planning submissions on various development plans for Arklow over the last number of years proposing additional lands for employment uses to north of the access road to Avoca River Park, but to no avail. Even though there is a planning history for employment uses north of the access road (PI Ref: 07/2118 Rappel Enterprises) and it has been proposed to relocate the previously zoned employment lands on Shelton Abbey to the lands to the north of the access road.

Currently the Arklow draft LAP proposes to remove approximately 12.5 hectares of Avoca River Park lands from within the settlement boundary (west of the Avoca River) in the ownership of Edmund Holfeld / Avoca River Park Ltd on the site of the former IFI facility. The proposed exclusion of these lands from within the Settlement Boundary and de-zoning will result in the severance of an important infrastructural / historic connection across the Avoca River to the railway line and public road to the west.

The Arklow draft LAP does not provide any explanation / rationale for this proposed de-zoning and exclusion from within the Settlement Boundary. Any de-zoning of these lands will damage the asset value and therefore the investment potential to build and expand employment at this location. This is a very serious matter for Edmund Holfeld / Avoca River Park Ltd.

It must be pointed out that there are no 'Flood Events' associated with the site of the former IFI, evidenced on the OPW's National Flood Hazard Mapping system. All zoned lands for Employment at this location are well above the banks of the Avoca River. Arklow is currently the subject of a flood risk management scheme and the Avoca River Flood Relief Scheme's Feasibility Report is due to be finalised at the end of 2017.

ARKLOW DRAFT LAP

As part of the Arklow draft LAP, under 'Employment Opportunity Site at Shelton' it is stated that:

This site is located in Shelton Abbey Townland, west of Arklow town and to the west of the M11 motorway. It was the site of the Irish Fertiliser's Industry (IFI) factory which operated from here from the 1960's to the 2000's. When in operation it was a thriving industry with a significant number of employees and had direct access to the rail network for freight.

The site has a number of distinct businesses operating from same. While this site is outside of the town's 'natural' western boundary, the N11, the fact that it is a brownfield site, previously occupied by intensive industrial users and given the availability of services to the site such as a natural gas supply line, high voltage electricity supply with a direct 110kv connection to the national grid and potential direct access to the Dublin to Rosslare train line to the south, it is considered suitable for designation for significant redevelopment for employment purposes. Vehicular access is from the Beech Road/L6179 to the north.

The Arklow draft LAP states that:

The former IFI factory site at Shelton Abbey, west Arklow has also been earmarked in this plan as an 'Employment Opportunity Site' for redevelopment given its strategic infrastructure assets.

ED3 To encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the settlement and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.

The site is zoned 'Employment 1' and measures 42.9ha (including all existing buildings thereon). The site is suitable for a significant employment / industrial development.

APPROPRIATE ASSESSMENT SCREENING REPORT

Objectives for employment lands at Shelton Abbey

- To promote and facilitate the development this site for a large-scale employment development,
- To facilitate the current business park use,
- Any significant development proposal for this site shall incorporate proposals to develop a landscaped linear open space park along the river bank.

Risk of Significant Effect (including in combination and cumulative effects)

None identified

Conclusion

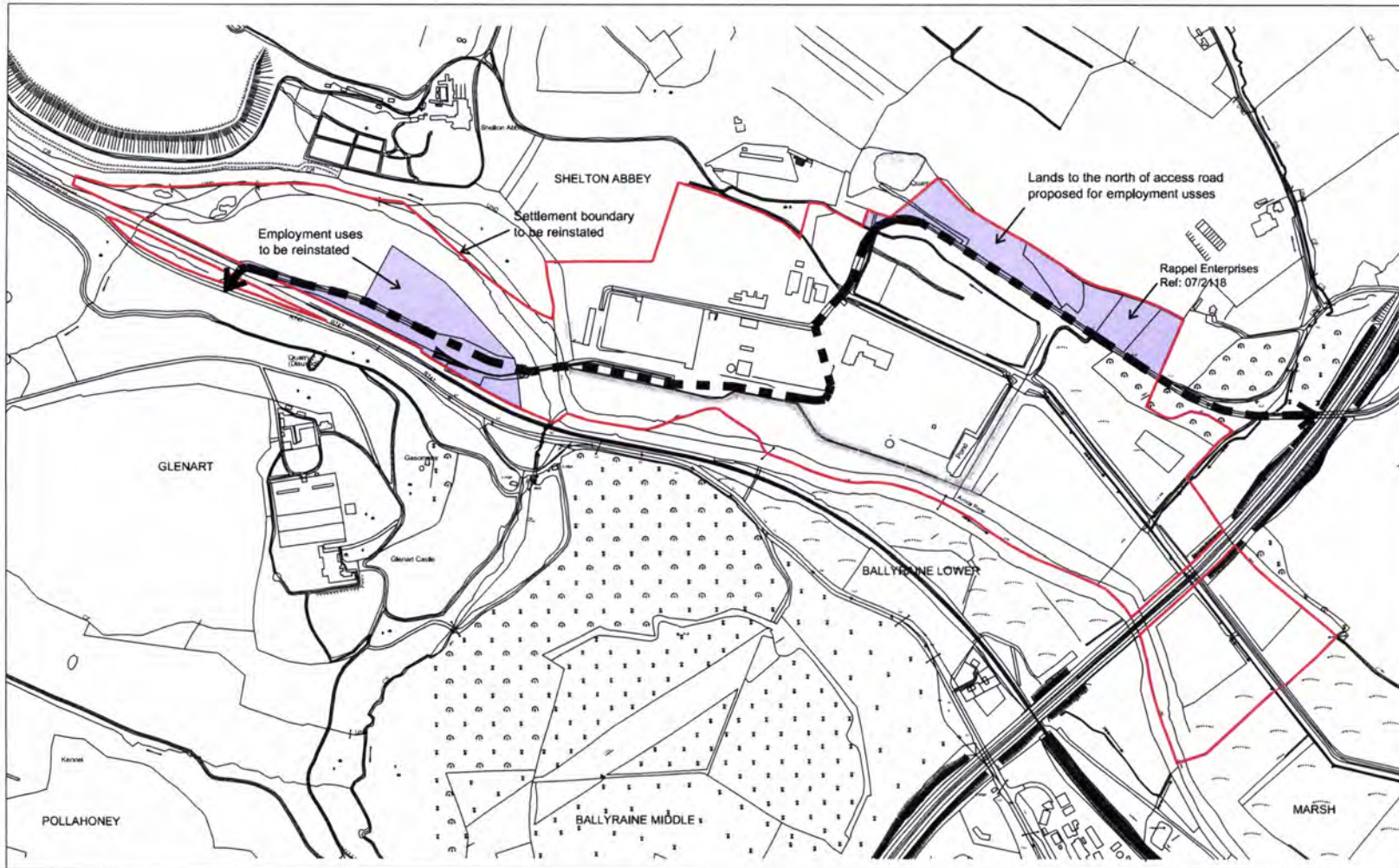
We respectfully request Wicklow County Council to reinstate the Settlement Boundary back to the current LAP boundary west of the Avoca River and reinstate the current Employment zoning on the lands between the Avoca River and the railway line/public road in the ownership of Edmund Holfeld / Avoca River Park Ltd (see attached map).

In addition, we respectfully request Wicklow County Council to change the boundaries of the current LAP to accommodate additional 'Employment' uses on the land to the north along the access to Avoca River Park in lieu of the employment lands removed from the Shelton Abbey complex (see attached map).

As submitted previously, the inclusion of additional Employment uses at this location would further facilitate future employment opportunities for the growing population and expansion of Arklow, and south County Wicklow.

Malcolm Lane

Malcolm Lane
Town Planner & Urban Designer
BA, MRUP, MA (UD)
PD Lane Associates
Date: August 2017



LEGEND

- Employment uses E
- Ownership line
- Proposed Road Access Link

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ARKLOW & ENVIRONS LOCAL AREA PLAN 2017 - 2023



GENERAL NOTES
This drawing should be read in conjunction with all relevant documents. Dimensions are in millimeters unless otherwise stated. Do not scale off drawings. Use figured dimensions only. Check dimensions on site. Report discrepancies immediately. Title copyright and right to use this document reserved to P.D. Lane Associates. All works are to comply with current building regulations. This drawing is for planning purposes only, not to be used for construction purposes unless otherwise stated.

REVISION	DATE	DESCRIPTION
REVISION	00-00-00	DESCRIPTION



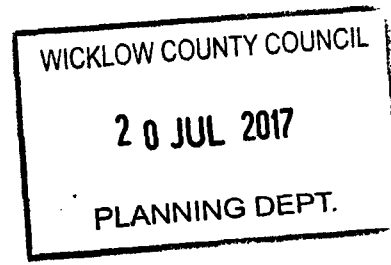
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PROFESSIONAL
REGISTERED
PLANNING
CONSULTANTS

PROJECT	LANDS AT AVOCA RIVER PARK, ARKLOW, CO. WICKLOW	DRAWING NO.	
CLIENT	E HOLFELD & AVOCA RIVER PARK LTD.	REVISION NO.	
DESCRIPTION	LAP SUBMISSION MAP		
STAGE	DEVELOPMENT PLAN	DATE	28 / 07 / 2017
SCALE	1 : 8000	DRAWN BY	xyz

Colette Hopper
"Maryville"
4 Harbour Road
Arklow



I moved to Arklow, and cant help feeling frustrated by its lack of development, and cant understand why, as it has so much potential, both for the community and tourism.

I was appalled at the environmental and health hazards that exist in Arklow, and the lack of action by its representatives. The time, years!!!!, it takes to get anything done. The lack of information, communication, and disconnect between the councils and the people of Arklow.

1. The River, the flow of raw sewerage into the river, now there is a sewerage treatment project. This continuing environmental disaster will affect the surrounding beaches, not to mention the rat infestation and other health issues.
2. River pollution. Metals and other chemicals are found to pollute the river, as well as sewerage and have killed of wild life, and human life and activity. No one was held accountable for it.
3. The river silts up, which causes flooding, (now being addressed). There are no plans for ongoing maintenance. If the river was cleaned up, it would bring back life to the river, and family water activities.
4. The Road Stone mines, is an eyesore on the landscape. How it was ever allowed to operate there is questionable.
5. 30/40 tonnes trucks are constant through a residential area, causing cracks, and shaking to residential properties. I believe there is a road, half finished, links to the motorway and avoids the town.
6. There is a huge amount of ground around the harbour, should be developed for tourism. Its potential is as good as any harbours around Ireland and the world. Look at Darling Harbour, Sydney, Australia, Dunlaoire, Graystones, Galway.
7. Tourism potential, bring in ships and boats, to Arklow, off shoots, would be shops and Restaurants.
8. Bring back the fishing, offshoots – fish market, and eateries. In Howth, they come for miles around to buy fish.
9. Move the industrial estate to the back of Arklow, an industrial estate, with road access to the motor way.
10. Lots of people walk down by the harbour, could be developed more for families, at the moment you get the smell of dog food from the factory, and run over by the trucks, as well a mouthful of dirt. Dog poo everywhere.
11. Bring back Arklow Pottery, and coffee shop, similar to other places, Newbridge, Kilkenny, and other tourist attraction for people visiting.
12. Arklow is overflowing with musical and acting talent. It needs a theatre. On a smaller scale, what about an opera house in Arklow, down by the harbour. People say, the best place for a theatre is "the Alps" facing the catholic church, would bring life back to that part of the town.
13. Boland's in the middle of the town, if that was turned into a shopping centre. this would bring life back to the middle of the town.
14. So much drive thru traffic, never stops, should be investigated for potential business.

15. Those who own properties in the town, and holding out for maximum return, and not allowing others to prosper, should be penalised
16. Reduced the rates, and introduced incentives for local entrepreneur, and help for small struggling businesses. Look at Gorey, why is that working?
17. Keep the authenticity of the town, that's what tourist like to see, especially those from overseas.
18. Help and services for Alcoholics and Drug addicts, so they are not outside, frequenting the woods along the river, and burning the seats for heat, and frightening walkers, make it safe.
19. Glenert Castle is an Arklow is an Icon, should be given back to the public. The Castle, Woods and surrounding Grounds should be developed for the purpose of public enjoyment. Look at Wells and Powerscourt. Could also earn an income. Why was it sold to the Chinese?, who have no interest in its upkeep.
20. Arklow should be included in Tourism. There was no mention of it, in Credan's Epic East,(which was not easy, more the midlands) or in the Wicklow Tourism brochure. Nothing at all.

Leonora Earls

From: Deirdre Joyce
Sent: 18 August 2017 11:22
To: Planning - Plan Review
Subject: Re: Submission on Arklow Local Area Plan and Environs: Ambition for Arklow: clarification of submission names

Dear Sir/Madam,

Please note that this submission is in the name of Deborah Veale (**nee Meehan**) and Deirdre Joyce.

I would be grateful if you could note this on your file record of public consultation submissions.

Many thanks,

Deirdre Joyce

On 18 August 2017 at 10:21, Deirdre Joyce <dmp.joyce@gmail.com> wrote:
To: Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town

Re: Submission: draft Arklow and Environs Local Area Plan (LAP) 2017

Submission theme: 'Ambition for Arklow'

August 18, 2017

Dear Sir/Madam,

I attach the joint submission of Deirdre Joyce and Deborah Veale on the proposed draft Arklow and Environs Local Area Plan 2017.

Yours sincerely,

Deirdre Joyce



**Ecosystem Services for Local Authorities (ESLA),
36 Glenbeigh Road, Cabra, Dublin 7**

Leonora Earls

From: Deirdre Joyce
Sent: 18 August 2017 10:21
To: Planning - Plan Review
Subject: Submission on Arklow Local Area Plan and Environs: Ambition for Arklow
Attachments: SUBMISSION-DEIRDRE-JOYCE-AND-DEBORAH-VEALE-FIN 18.08.2017.docx

To: Administrative Officer, Planning Section, Wicklow County Council, Station Road, Wicklow Town

Re: Submission: draft Arklow and Environs Local Area Plan (LAP) 2017

Submission theme: 'Ambition for Arklow'

August 18, 2017

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Yours sincerely,

Deirdre Joyce
**Ecosystem Services for Local Authorities (ESLA),
36 Glenbeigh Road, Cabra, Dublin 7**

**Deirdre Joyce, Ecosystem Services for Local Authorities (ESLA), 36 Glenbeigh Road,
Cabra, Dublin 7**

**Deborah Veale, 3 Monkstown Rd, Montpelier, Monkstown, Co. Dublin
<http://www.deborahveale.ie/>**

To: Administrative Officer, Planning Section, Wicklow County Council, Station Road,
Wicklow Town

Re: Submission: draft Arklow and Environs Local Area Plan (LAP) 2017

Submission theme: 'Ambition for Arklow'

August 18, 2017

Dear Sir/Madam,

We wish to make a submission on the proposed draft Arklow and Environs Local Area Plan 2017. Having reviewed the plan document online (<http://www.wicklow.ie/arklow-environs-local-area-plan-2017>) we are proposing the following recommendations and amendments to the plan.

Preliminary remarks

Both myself and Deborah Veale are former residents of Arklow, having grown up there in the 1980s. Arklow has witnessed many changes since we were residents and has felt the impact of several recessions in the intervening years. We feel however that while Arklow has great potential this has not been realised over the decades. The LAP is an opportunity to create the necessary conditions to shape an 'Ambition for Arklow' that could enable the town to grow and prosper into the future. This ambition should be based on the principles of sustainable development and based on a vision of growth in-keeping with good planning practice that supports development that will enhance the health and wellbeing of the local community and beyond.

Arklow is a town with many assets that many other Irish towns would envy: a river, a port, a railway line, close proximity to the capital of Ireland, a tourism base, proximity to the 'Garden of Ireland', an intact town centre with retail core and local independent shops, a river bank, buildings of architectural merit, natural heritage assets in proximity to the town including the coastline and designated natural heritage sites, historic local indigenous industry, including significantly, the former renowned Arklow Pottery, a fishing, shipping and ship building history, a golf links, as well as a vibrant local community with many community groups and activities, including the annual Arklow Feis Ceol and Sea Breeze festival. Despite all of these assets Arklow has experienced a decline, most notably in the town centre and in the lower docks/port area. We believe that with ambition Arklow could address its current decline by focussing on developing its core assets. We believe the following recommendations should be considered by Wickow County Council in order to advance this 'Ambition for Arklow'.

Submission points

1. Waterfront Zone Permitted Uses: The plan states that it aims to focus “the redevelopment of the waterfront area as a key location to provide significant residential development while also facilitating the existing port activities and further tourism, community, recreational and maritime uses”.

The plan states that the following uses are permitted:

Waterfront (WZ) (p.53) – *“Uses include houses, apartments, residential open space, education, community facilities, **retirement homes, nursing homes, childcare, health centres, guest house, bed and breakfast, home based economic activity, retail, restaurants, public house, hotels, parking, maritime uses, aquaculture, harbour uses, tourism uses, recreational uses, general and light industry, office uses, waste water treatment plant, utility installations and ancillary development** and other residential uses in accordance with the CDP”.*

We believe that the Waterfront area (zoning: WZ) as described above and including the uses permissible within this zone does not provide sufficient clarity about what the vision is for this key area within Arklow Plan.

It is suggested that there are too many uses permissible within this zoned area and that it is more appropriate to maintain and restrict this area for uses compatible with 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. The Grand Canal dock area of Dublin city centre is an appropriate model with its strong IT base (Facebook, Google, LinkedIn etc...), along with amenity use of the water basin for sports at ‘Surfdock’ (<http://www.surfdock.ie/>). In the Arklow plan we suggest more emphasis should be placed on developing the amenity value of the river and harbour area as a location for the development of a water based activity hub for the south east region and also to enhance the appeal of Arklow to potential industry and employees. This amenity potential should be planned in advance of and in readiness for a time when the current waste water treatment issues are resolved.

We suggest that the uses outlined in bold above be removed as they are not compatible with the waterfront amenity and with economic activities as described above.

In order to build on the amenity potential of this zone we also suggest that the area zoned AOS (Active Open Space) 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 for kayaking, canoeing, paddle boarding and on-shore fishing.

New zone for Arklow Pottery site and environs

In addition to the above we suggest that the industrial centre of the harbour area should be developed. In this regard we suggest 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. In this regard we suggest the Council could make connections with Irish designer Orla Kiely (<http://www.orlakiely.com>) and others noted within Ireland for ceramic design and production, to ascertain if there is interest in locating a manufacturing site or showcase in this location similar to Newbridge Silverware style icons (<https://newbridgesilverware.com/mosi>). It might also be appropriate to consider this site as a

location for showcasing Irish design more generally or perhaps showcasing Irish food. Kilkenny Design is an appropriate model in this instance (<http://www.kilkennydesign.com>).

Masterplan for Waterfront Area

In order to give effect to the above we suggest that the Waterfront Area requires its own Action Area Plan or Masterplan to be included within the Arklow and Environs Local Area Plan (LAP) 2017.

2. Natural and Built heritage Asset Assessment – Cultural Ecosystem Services

Fingal County Council is an exemplar in the development of Green Infrastructure (GI) Planning. It has recently included an objective within the latest Development Plan to use Ecosystem Services Approaches to public consultation to inform GI planning (see <http://www.fingalcoco.ie/media/Written%20Statement%202017-2023.pdf>). It is suggested that this approach which evaluates the public's perception and desires for interaction with the natural heritage and its potential to enhance planning, is adopted for Arklow Town Plan. Guidance on ES approaches to consultation is available on <http://www.oppla.eu/> and on the EU FP7 Research project OPERAs (<http://www.operas-project.eu/>). 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).

3. Health and wellbeing

It is suggested that significant emphasis should be placed within the plan on the need to support and enhance the health and wellbeing of the residents of Arklow. In this regard the Council should indicate within the plan proposals to address walkability and cycling options within Arkow 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. This objective would align with public policy to adopt climate change proofed development plans. In addition it supports public policy health objectives to increase personal mobility and increase activity to reduce rising obesity amongst the general population.

4. Rejuvenation of the existing retail core

It is suggested 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. In this regard it is suggested that the Council investigate the potential, desirability and acceptance of a proposal for the development of short term retail activity including innovative 'pop up' retail, exhibition and enterprise units within the existing core. In Dublin, Block T (<https://www.blockt.ie/>) and Funbally Exchange (<http://www.fumballyexchange.com/>) are examples of how innovative enterprise space might evolve. In addition we suggest that the St. Mary's park in the centre of the town is used for a monthly (or weekly) local producer's food court or market for the county as a whole. This may act as a much needed draw into the town centre to increase footfall.

5. Public realm at key entry point to the town

It is suggested that the Council consider removal of the bollards cluttering the main entry point into the town from the north side and resurface the paths at this point. In addition the central roundabout at the junction to Arklow bridge from the north should be revised due to its cumbersome nature.

6. Tourism potential

It is suggested that the Council undertake a Public Participation GIS of the Arklow's built and natural heritage. This information could be included in Map 2 (a) and Map 2 (b) of the LAP. PPGIS would allow the public to identify and articulate why such places, buildings or sites are important. This might be carried out by utilising UCD's social innovation company *Space Engagers* and its sister company, Reusing Dublin. These two companies use citizen science applications to enable the public to populate and describe sites. (<https://dublin.ie/working/articles/space-engagers/>).

7. Age Friendly towns

We suggest that the plan should be proofed for children, the elderly and those with disabilities. Given the demographic profile of the country it will be necessary to plan for the varied needs of our growing population. There should be an objective within the plan to provide the necessary proofing to address accessibility issues for all relevant people. See <http://agefriendlyireland.ie/> and <http://www.jackiebourke.com/> (child friendly cities) for more guidance.

8. Climate Change mitigation and adaptation: carbon absorption and coastal defence

We suggest 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. This would also enhance the public realm of the town and increase biodiversity. In addition the Council should identify where and how Arklow's coastal defences might be enhanced by means of Green Infrastructure to protect against the impact of flooding arising from climate change.

Conclusion

We have outlined the above points in the hope that some ideas and proposals may assist the Council and its Planners in considering the potential of the town. We believe that with some 'Ambition for Arklow' and blue sky thinking the town may prosper into the future, attracting new investment and creating a dynamic that will allow Arklow to stand proud competing with the other towns (Gorey, Wicklow, Wexford) on the south east coast.

Yours sincerely,

Deirdre Joyce, M.Sc, M.Litt

Deborah Veale, BA.

Lisa Rothwell

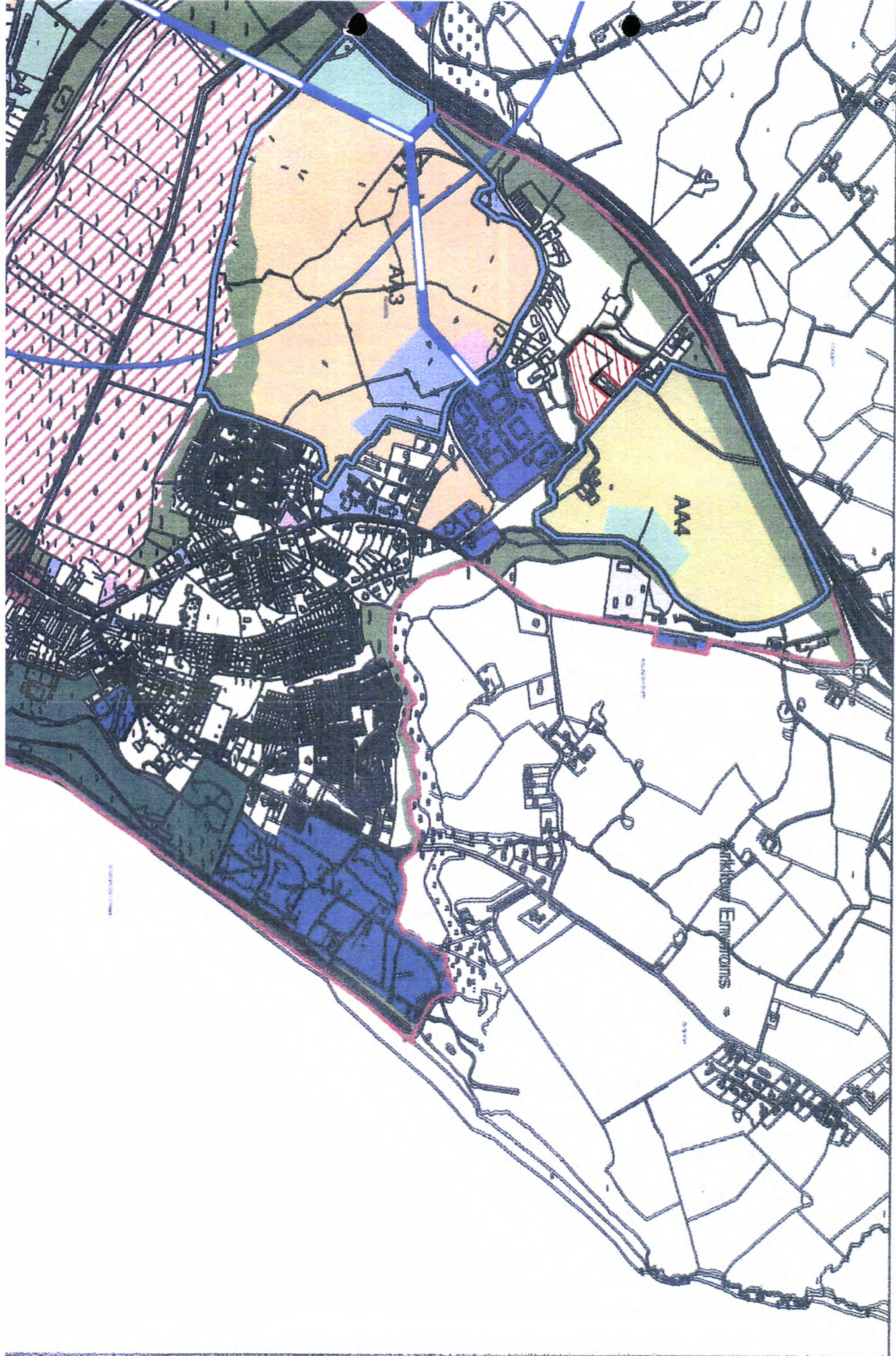
From: Robert Kennedy
Sent: 18 August 2017 14:53
To: Planning - Plan Review
Subject: Arklow LAP
Attachments: CCF18082017_00000.jpg

Regarding proposed zoning of our lands at Kilbride/Coolboy.

We do not wish this land to be zoned bar the circa 6 acre plot shown on the attached map in red marking.

Regards
Michael Kennedy,
Robert Kennedy,
Alan Kennedy.





AA3

AA4

Kirklow Environs

1:25000

2000

Leonora Earls

From: jonathan otoole [j] |
Sent: 18 August 2017 11:36
To: Planning - Plan Review
Subject: Arklow LAP Submission 18.08.17
Attachments: Arklow LAP Submission 18.08.17.pdf

Dear Sirs

Please find attached submission in relation to the above

Kind Regards

Jonathan



Planning Department
Wicklow County Council
County Buildings
Station Road
Wicklow Town

RE: Arklow and Environs Local Area Plan

Dear Sirs,

In relation to the above, I would like to make a submission on the Arklow local Area Plan and in particular the proposals to **enhancing the “public realm”**

Enhancing the Public Realm

The current and proposed local area plans set out objectives to improve the public realm by *“Ensuring a vibrant town centre with a high quality public realm;”*

The 2017-2023 proposed local area plan states that,

“The elements in and around Arklow’s town centre that contribute mostly to the quality of the public realm are the streetscape; landmark buildings and appearance of principal junctions / gateways; building frontages, in particular materials, colours and shop fronts; the relationship of the Main Street to the river; urban open spaces and parks, and the juxtaposition of structures to spaces and; footpaths, lighting, seating and other street ‘furniture’.”

The proposed local area plan further states under ‘Promoting and facilitating improvement in the quality of life in Arklow ‘that specific actions to improve the quality of life include,

“Ensuring a vibrant town centre with a high quality public realm;”

It should be noted that the current Arklow Environs Plan 2011-2017 actually goes further in its public realm strategy offering several public realm objectives and while the current and proposed objectives for the public realm of the town should be warmly welcomed and encouraged, these objectives are not being carried out in reality and the council have not adhered to their own policies.

I now include examples of the failures to implement a high quality public realm strategy that has in my opinion had a detrimental impact on the public spaces in the town which in turn is having a damaging impact on the economic and social life of local residents, visitors and potential employers.

One Way System

At the time of the proposed one way system to the Main Street, the council issued photomontage and literature showing that the proposed works would use high quality materials like granite paving to widen the paths and introduce traffic calming islands. The end result is large expanses of concrete hard landscaping to Lower Main Street and Castlepark which is both unattractive and at odds with the brick paving to the existing public paths along the main street.



Unattractive contrast between existing public paths and recent council works



Unattractive large expanse of concrete hard landscaping



19 Arches Bridge Works

While the works to the 19 Arches Bridge in 2015 did use high quality granite kerbing and a small proportion of granite edging and paving, large sections of the public footpaths were finished in tarmac/bitumen material to what is a historical and protected structure. Likewise, high quality railings were introduced to the main bridge while cheap inferior railings have been left in place to the north of the bridge.



Works undertaken in 2017 at the Bridgewater roundabout has left large parts of the public realm space unfinished with building materials still left on display months after works appear to be complete.

Public Paths to Dublin Road

Works were undertaken in 2016 to construct new public paths on the Dublin Road. While the new paths were constructed in concrete, the opposite side of the road which was upgraded in recent years is finished in a tarmac/bitumen finish. This again highlights that the council have no strategy for public works to Arklow and the contrast of materials being used is actually having a negative impact on the attractiveness of the public realm.



Public Realm Strategy/ Design Statement

Arklow Municipal District Council and Wicklow Co. Council should develop a public realm strategy for the main street and surrounding areas that provides guidance on specific design elements and details and develops a consistent materials palette to create a coherent image for the town centre with the quality of the detailing and implementation of the public realm being of an exceptional high standard.

A public realm design statement should be adopted into the proposed Arklow local area plan which sets out clear development standards for both public and private works and outlines an acceptable list of materials that can be used in development works going forward.

In order for the community to adopt this approach, the council must lead by example and introduce a standard of high quality materials to be used in all future projects that will improve the attractiveness of the public realm and visual amenity of Arklow's main street. By improving the public realm of the main street, this can be used as a catalyst to improve the commercial activity of the main street for the benefit of the town as a whole.

An Example – Westport Town

Please see the below photos which show a consistent materials palette and use of high quality paving, kerbing, and street fixtures and soft landscaping used throughout Westport town.



Consistent and complimenting palette of materials used for traffic calming



Attractive use of high quality granite used in traffic calming ramps



Attractive use of soft landscaping used in traffic calming islands



Inviting and appealing soft landscaping in town centre



The photographs above show the contrast between an attractive public realm space and what Arklow currently designs and implements.

There is now an opportunity to implement a public realm design statement into the proposed local area plan which can result in a uniformed theme that will be inviting to both locals and visitors and enhance the overall public realm.



Greystones Harbour above is a fine example of a well thought out public realm design using materials of the highest standard.

Towns like Westport, Wexford Town, Kinsale and our close neighbours Gorey, have public realms that are inviting and attractive due to their consistent use of high quality materials throughout their towns.

I kindly ask that a detailed public realm strategy and design statement is included into the new local area plan to eliminate mistakes of the past and provide a guidance to both public and private sectors going forward.

Yours sincerely

Jonathan O'Toole
Deansgate
Dublin Road
Arklow
Co. Wicklow.

1 Carrigmore,
Dublin Road,
Arklow
County Wicklow

Forward Planning Section
Wicklow County Council
County Buildings
Wicklow



11th July 2017

Re: Draft Arklow & Environs LAP 2017 – AA3 Kilbride

Dear Sirs,

I refer to the above matter and in particular to Action Area 3 included in the draft 2017 plan as it affects our property.

Action Area Plan 3 of the 2011 – 2017 LAP included, with our consent, a section of the lands attached to our dwelling at 1 Carrigmore, Arklow. Enclosed for reference is map showing the location of the lands in the current AAP circled in red together with aerial image and OS map of the lands referred to.

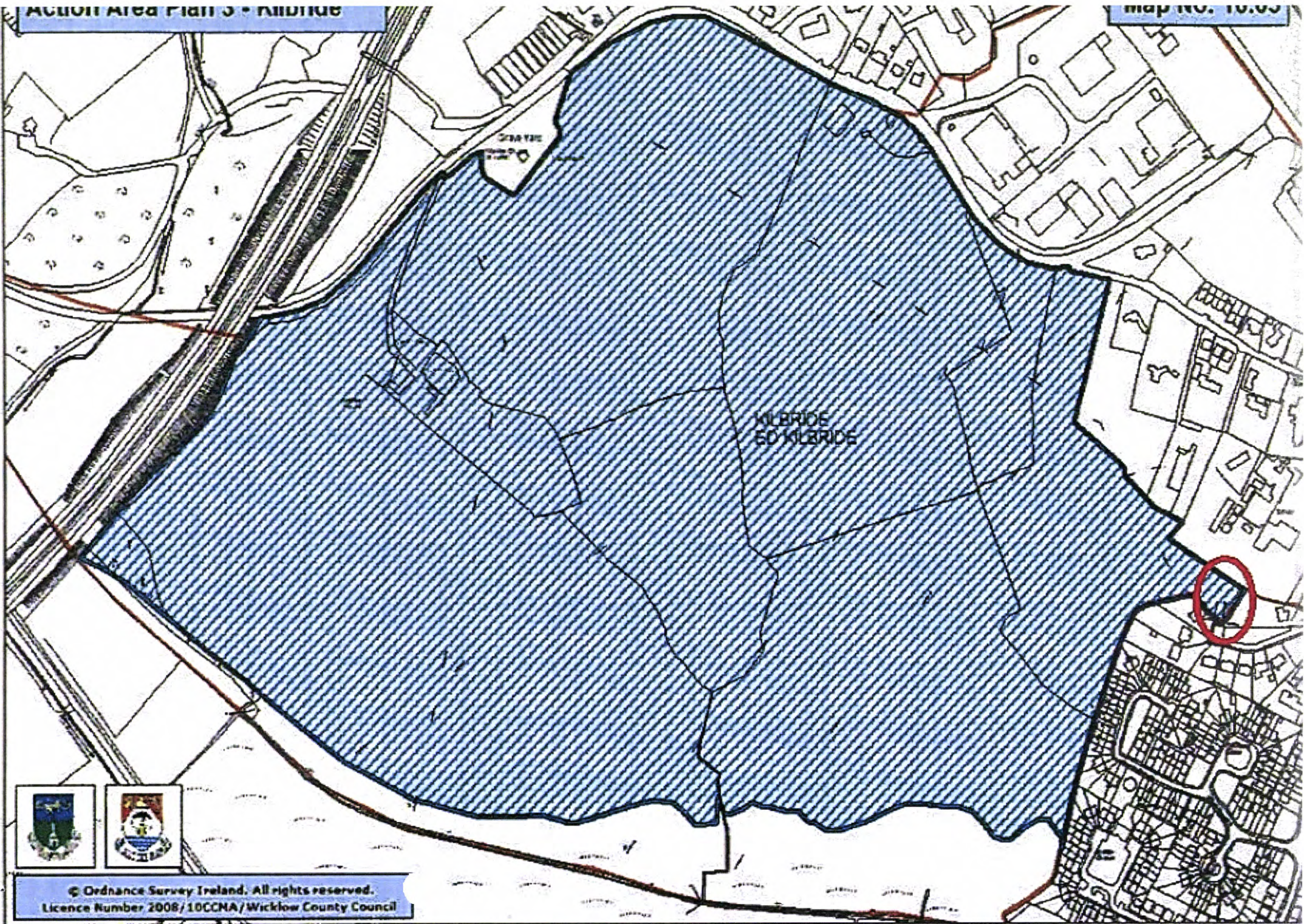
As there is no agreement to include our land in AA 3 of the 2017 local area plan and as it is currently in use as part of the garden attached to our dwelling, I would be obliged if the land use zoning map in respect of this land could be amended to RE "Existing Residential".

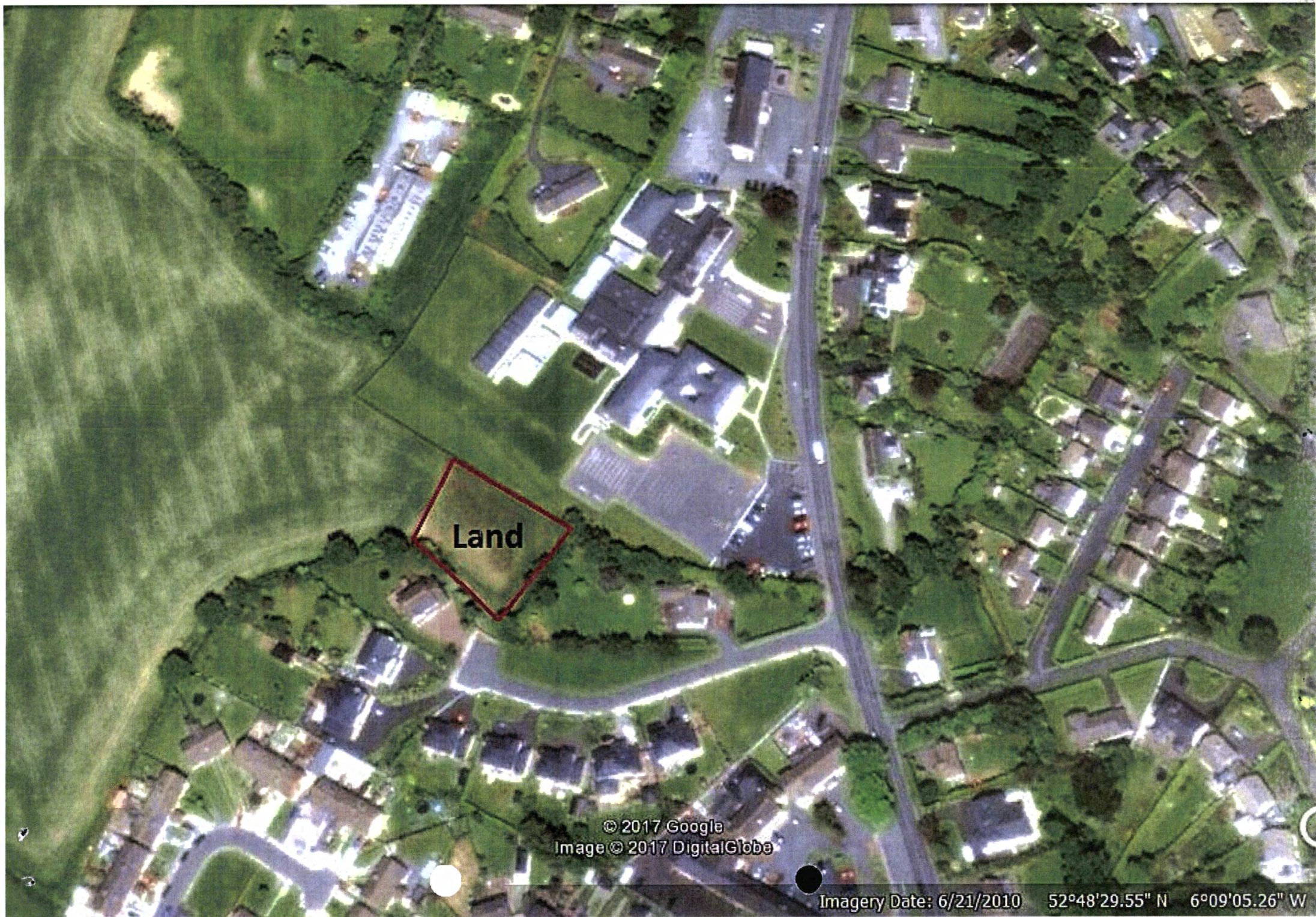
Yours sincerely,

Mamie Quirke

Sean Quirke







Land

© 2017 Google
Image © 2017 DigitalGlobe

Imagery Date: 6/21/2010 52°48'29.55" N 6°09'05.26" W

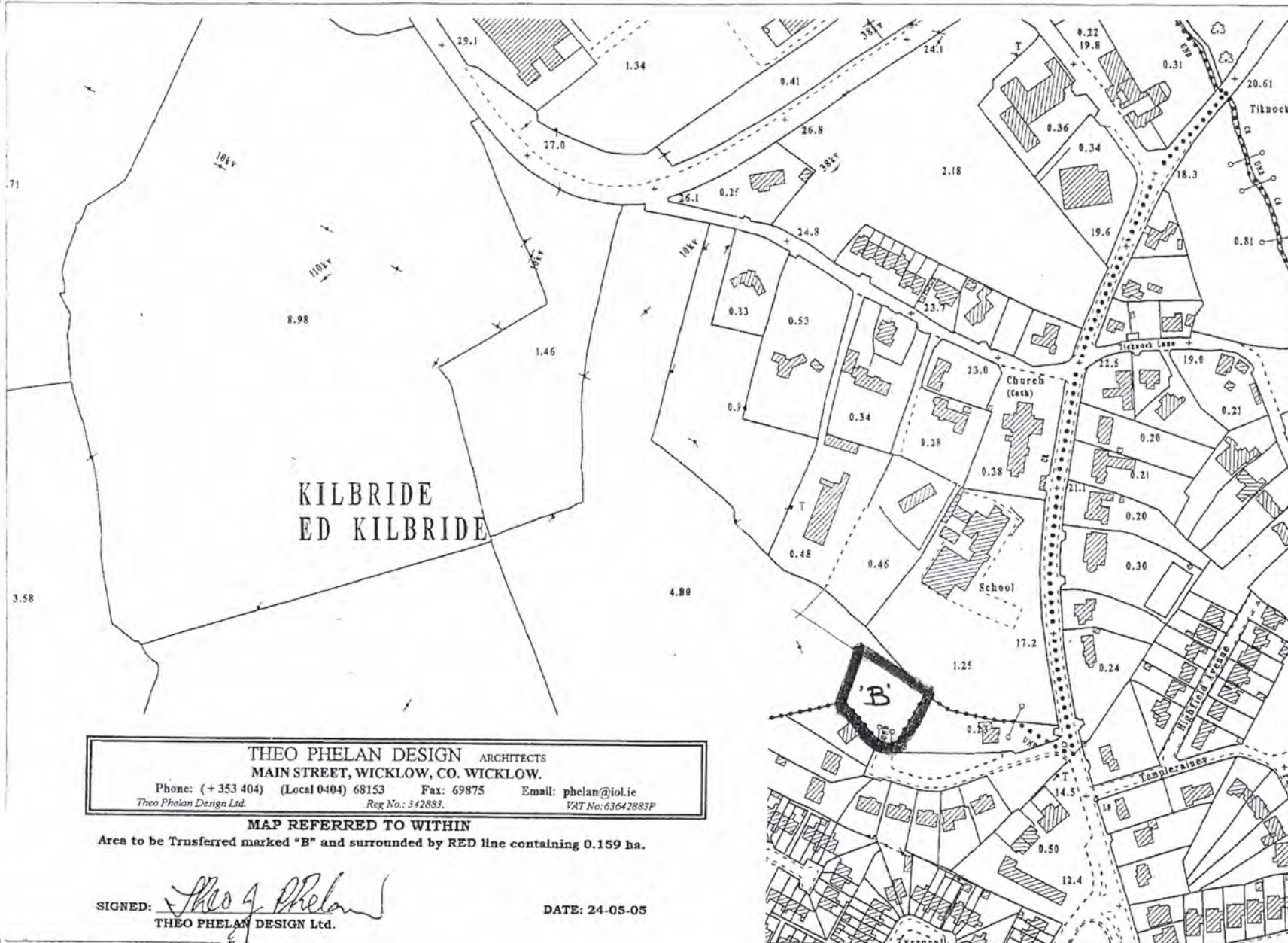
Surveyed 1998
 Revised 2003
 Levelled 0

Rural PLACE Map



175010
 324900
 174400

175010
 324900
 174400



THEO PHELAN DESIGN ARCHITECTS
 MAIN STREET, WICKLOW, CO. WICKLOW.
 Phone: (+ 353 404) (Local 0404) 68153 Fax: 69875 Email: phelan@tol.ie
 Theo Phelan Design Ltd. Reg No.: 342883. VAT No: 63642883P

MAP REFERRED TO WITHIN
 Area to be Transferred marked "B" and surrounded by RED line containing 0.159 ha.

SIGNED: *Theo J. Phelan*
 THEO PHELAN DESIGN Ltd.

DATE: 24-05-05

DESCRIPTION

MAP SCALES

1:2500
 442B-A



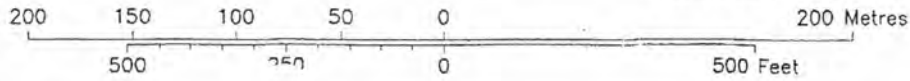
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Scale: - 1:2500
 Scála: - 1:2500



Plot Ref. No. 249941_1_1
 Plot Date 18-MAY-2005

CONOR MC CARTHY & ASSOCIATES Ltd
Consulting Engineers and Project managers

Unit A8
Kish Business Park
Arklow
Co Wicklow

Phone: 0402 24660
Mobile: 087 6876 120
cmcagroup@gmail.com

Submission
on
Draft Arklow and Environs
Local Area Plan 2017
for
Rappel Enterprises Ltd

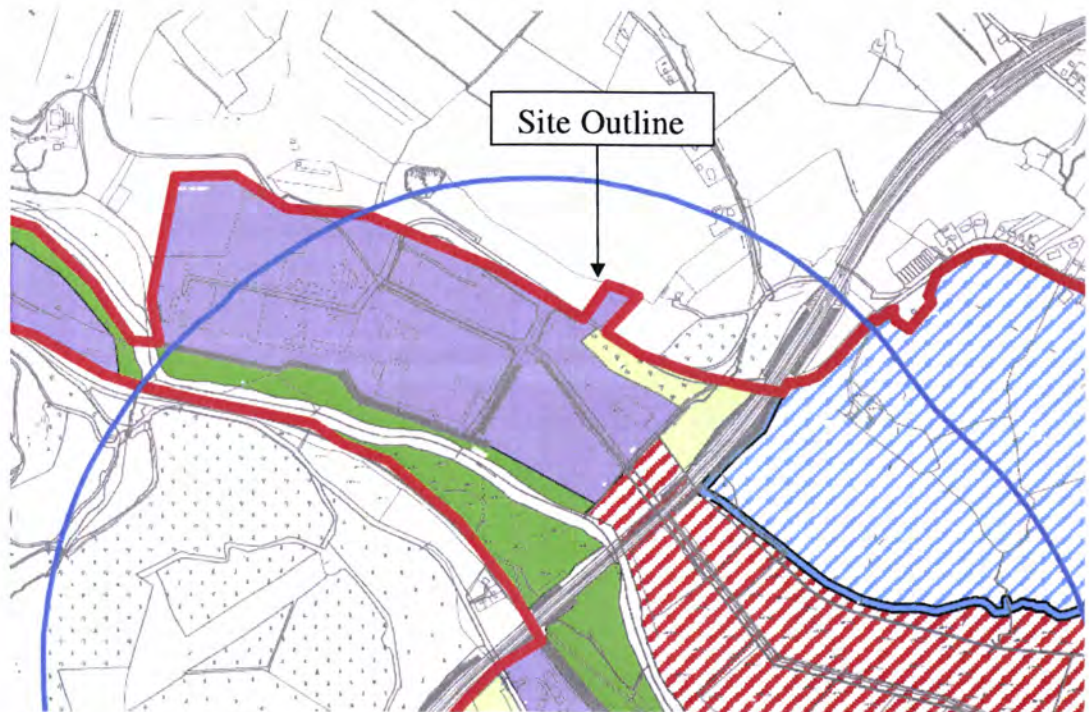
Project Reference: 06.659

August 2017

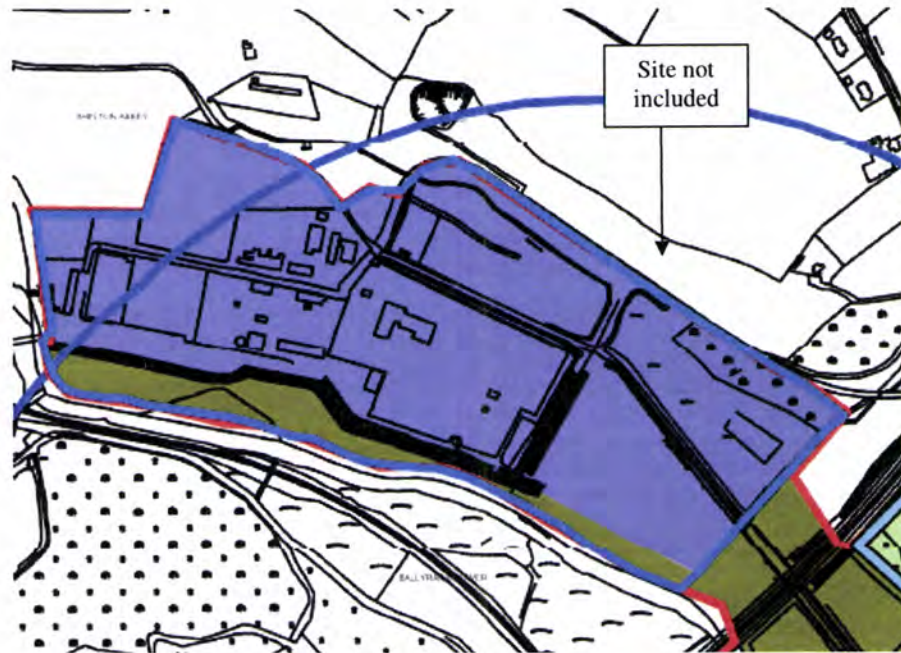
1.0 Introduction

This submission is on behalf of Rappel Enterprises Ltd who own a 2.5 acre site at Avoca River Park(former IFI Facility) , Arklow.

1.5 Acres of the site is zoned employment within the boundary of the current 2012 – 2017 Arklow Local Area Plan but appears to have been excluded in the new draft plan.



Extract 2012-2017 Plan



Extract Draft 2017 Plan

2.0 Submission

Our submission is that the 1.5Ac site should be retained within the boundaries of the new plan.

3.0 Planning Assessment

3.1 Planning permission history

Planning was granted in 2008 (PPR 07/2118) for an Industrial Unit on 1.5 Acres of the site.

The site was subsequently included in the 2012 Arklow development plan.

The original planning (07/2118) expired in March 2013.

Planning was reapplied for in 2013 (PPR 13/8823) for the same development and this planning is current.

Submissions at the time identified the following:

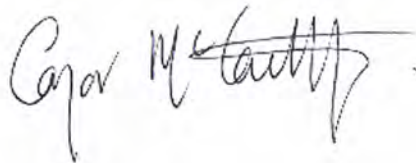
- The site as part of an existing zoned, industrial site.
- Suitable road access network.
- Suitable infrastructure available on site.

Conclusion

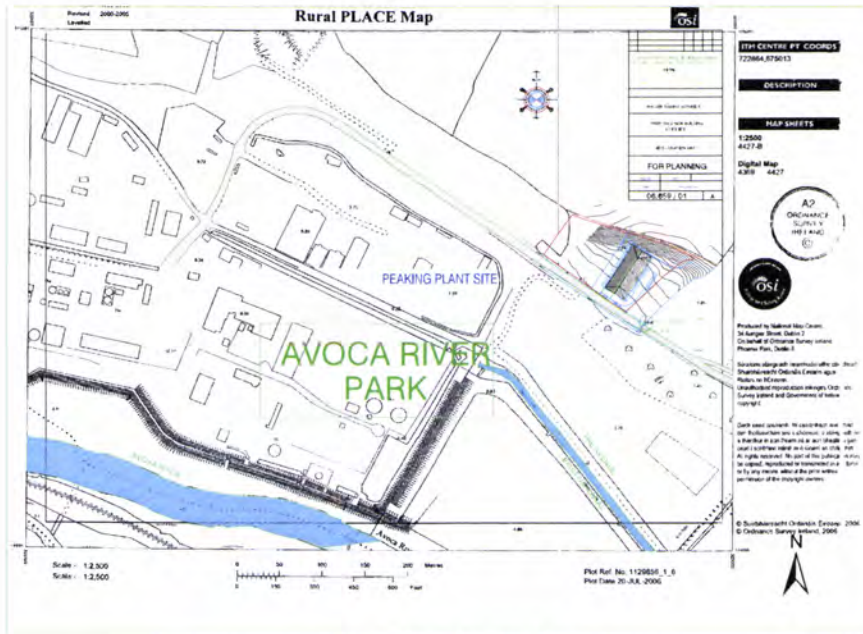
The site meets the various objectives and technical requirements required by the relevant development plans.

Planning has been granted for industrial development on this site.

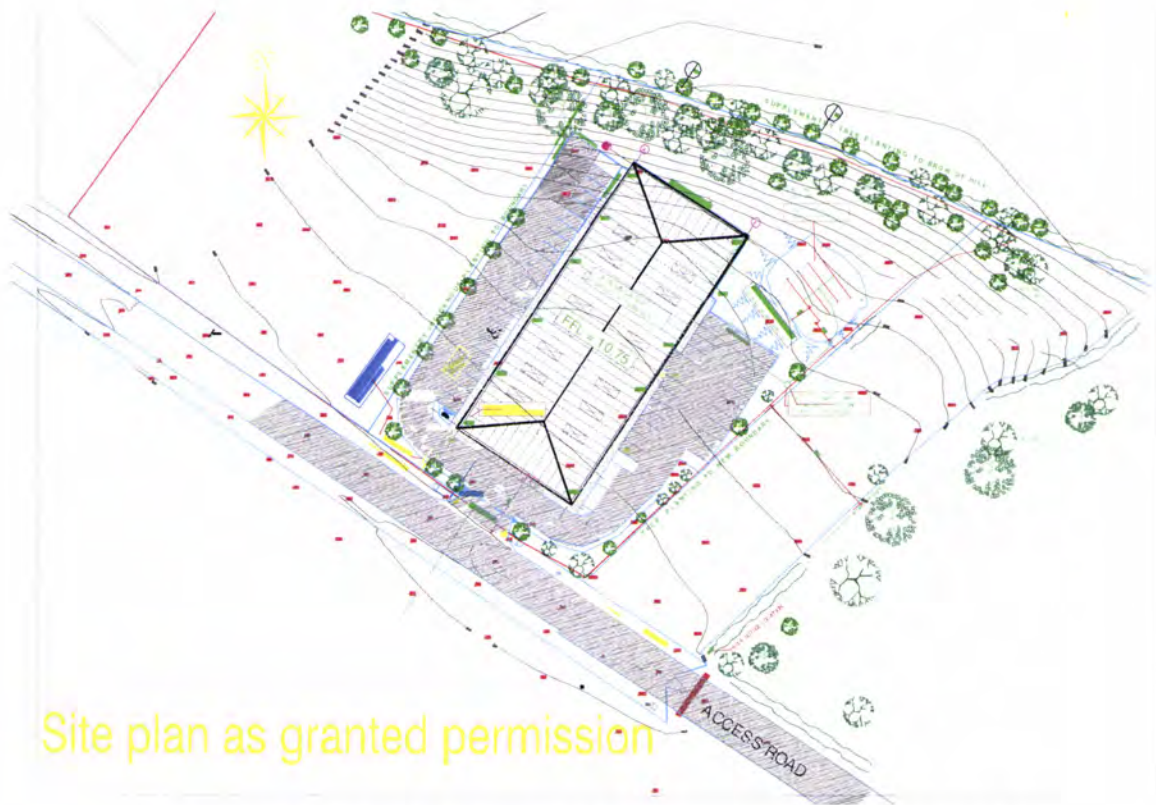
The inclusion of this site, which has permitted use for industry and possesses the existing infrastructure, within the employment-zoning boundary is appropriate.



Conor McCarthy
Chartered Engineer



SITE OUTLINE



SITE OUTLINE WITH PLANNING PERMISSION SITE PLAN

320

Leonora Earls

From: Aoife Byrne [abyrne@slrconsulting.com]
Sent: 17 August 2017 18:43
To: Planning - Plan Review
Subject: 501.00180.00141/14 Draft Arklow and Environs LAP submission
Attachments: 170814 501.00180.00141.14 L. Submission Draft Arklow LAP.pdf



Dear Sir/Madam,

Please find attached a submission on behalf of Roadstone Limited regarding the draft Arklow and Environs LAP.

Regards,

Aoife



Aoife Byrne

Senior Planner - Planning

+353 1 296 4667
abyrne@slrconsulting.com

SLR Consulting Ireland
7 Dundrum Business Park, Windy Arbour, Dublin, D14 N2Y7



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17th August 2017

BY EMAIL

Draft Arklow and Environs Local Area Plan
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town
Co. Wicklow

Our Ref:501.00180.00141/14

Dear Sir/Madam

**RE: *ARKLOW AND ENVIRONS LOCAL AREA PLAN 2017 - 2023
DRAFT LOCAL AREA PLAN CONSULTATION – SUBMISSION BY ROADSTONE LTD.***

INTRODUCTION

SLR Consulting Ireland acts as planning and environmental advisors to Roadstone Limited, Fortunestown, Tallaght, Dublin 24.

Roadstone Limited has property assets within the Arklow Environs LAP area, namely Arklow Quarry (referred to in the draft LAP as the “Roadstone Quarry”) to the south of the town. Arklow Quarry is a strategic asset, providing construction materials to Arklow, the region and nationally. It has also exported aggregates through its jetty facility.

The history of Arklow Quarry can be traced back to early in the 19th century when workings at the quarry were first recorded. Charles Stewart Parnell bought the quarry in 1885. Up to 200 people were then employed to produce hand-dressed “setts” used to pave streets and roads for Dublin, Liverpool and many other towns.

This submission relates to the consultation on the Draft Arklow and Environs Local Area Plan 2017 - 2023.

BASIS OF THIS SUBMISSION

Importance of Extractive Industries

The importance of the extractive industries to the wider economy and the need to protect the operations of working quarries and proven aggregate resources is firmly established in national and regional planning policy.



Section 5.4.3 of the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 (including Wicklow) states the following in relation to quarrying and extraction

“Extractive industries are essential to the economy in terms of supply of aggregate materials for the construction sector, delivering transport infrastructure projects, and for the export market. There is, however, potential for conflict in the operation of these industries with wider environmental considerations. The role of the planning system is therefore to regulate, promote or control the exploitation of natural resources taking into account these other issues...”

In planning policy terms and in order to strategically plan for future needs, there is a need to take stock of existing aggregate resources and other valuable minerals/ores and identifying potential sources which have major deposits of regional and county importance. Local authorities should engage with GSI, in so far as feasible, in mapping exercises designed to identify aggregate potential within their respective county and across a wider regional scale. Suitable protection measures for such sites should be considered to ensure their potential may be realised. Planning, heritage and environmental guidance together with legislative requirements should be used to frame policies for extractive industries. In assessing applications for extractive industries, considerations and impacts as they relate to the objectives of the Water Framework Directive (and therefore River Basin Management Plans) and other EU Directives (such as those regarding wildlife and habitats) should be central to the decision making process. Secondary impacts such as increased HGV traffic on adjoining communities and screening are key issues, and the use of levies to compensate the surrounding areas through investment in local social and other infrastructure is supported.”

The Strategic Objective of the Wicklow County Development Plan 2016 – 2022 in relation to extractive industry seeks:

“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.”

The extractive industry provides the necessary raw materials for the majority of building and infrastructure development in Ireland, including roads, motorways, homes, schools, hospitals, colleges, factories, water and sewerage systems, power stations, railways and sporting stadia. The construction of such infrastructure is heavily dependent on the supply of crushed stone, concrete and other building materials made from aggregates.

Aggregate extraction can only take place where suitable resources exist; they are a ‘tied’ resource. It is considered, therefore, that 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.

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.

Given the strategic importance of quarries, it is necessary to consider the potential for planning polices to affect adversely the long-term availability of aggregate resources.

Strategic Importance of Arklow Quarry

As stated above, Arklow Quarry is a strategically important asset providing a long-term, secure supply of aggregate and value-added products to Wicklow, the Eastern Region and nationally. In addition, the rock resource at Arklow Quarry has particular and rare characteristics that are of critical importance to various types of infrastructure development.

Arklow Quarry is one of a few quarries in Ireland that can supply railway ballast. It also supplies high PSV (polished stone value) aggregate to various county councils nationally. High PSV aggregate has a high skid resistance and is, therefore, in great demand for surfacing roads with heavy traffic flows.

The quarry has also supplied rock armour for coastal defence systems in the UK and on the east coast of Ireland; this resource is likely to be of growing importance in the context of climate change and the need to reinforce coastal defences. Roadstone has supplied rock armour to many coastal defence projects in Wicklow alone, including those at Ballygannon, Kilcoole, Arklow and Greystones.

The jetty facility operated by Roadstone at the quarry is a strategic transportation resource. The jetty has been used to supply High-PSV and rock armour to the UK and Ireland and facilitates the sustainable and efficient transportation of product to coastal locations without the need for HGV transport or unnecessary handling. The combination of the jetty in close proximity to the quarry and the rare properties and critical importance of the rock resource means that Arklow Quarry is of strategic importance at a national level.

On the basis of the unique characteristics of the rock resource and the strategic importance of the Roadstone jetty at Arklow Quarry, the following amendments are proposed to the draft local area plan.

Southern Port Access Road

The draft LAP provides for new roads that link the port area through the Arklow Quarry to the N11. The road also includes spurs into previously undeveloped lands that are now zoned for residential, employment and special employment uses. 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.

Policy IT9 seeks:

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. Possible future connections of the SPAR to the Clogga Road (at Kish / Rock Big) may also be considered.

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 (page 22), 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.

Roadstone considers that the proposed policy should be amended as follows:

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.

Until further details of the proposed road layout and land acquisition requirements are made available and the potential effect on the quarry can be assessed, Roadstone will look to ensure that the integrity of its asset at Arklow, including the privately owned access road, is protected.

Zoning

The access route to Arklow Quarry is zoned OS2. The purpose of this zoning is to protect, enhance and manage undeveloped land. 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. It is considered that 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 typical uses in relation to extractive industry zoning (EX) are described on page 53 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 in accordance with the CDP.

Given the importance of value added production at quarries generally and at Arklow Quarry in particular, it is considered that this 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.

Action Areas

The LAP provides for two 'Action Areas', namely AA1 and AA2. These comprise previously undeveloped land that is proposed for comprehensive development. AA1 is located east of the Arklow Golf Course and AA2 is located east 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. Page 55 of the LAP includes a comprehensive list of criteria in respect of the development of AA2, but 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.

In addition, the following bullet point should be added to the criteria:

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 on-going quarry operations and associated value-added production facilities.

CONCLUSION

The extractive industry provides essential building materials for residential development, infrastructure, health care facilities, education facilities and all other forms of built development. Extraction can only take place where resources occur and it is, therefore, tied to certain locations.

The local area plan should continue to recognise the strategic importance of Arklow Quarry. It is important to ensure that the future interpretation of local area plan policies does not prevent the secure, long-term supply of construction aggregates and value-added products (such as concrete blocks and road making materials) 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 local area plan.

Yours faithfully
SLR Consulting Ireland



Tim Paul
Director

Cc Mr. S. Geraghty (Roadstone Ltd.)

Lisa Rothwell

From: Fintan Morrin [fintan@theplanningpartnership.ie]
Sent: 18 August 2017 15:23
To: Planning - Plan Review
Cc: yellowlanebp@gmail.com
Subject: Draft Arklow Local Area Plan Submission
Attachments: Arklow Draft LAP Submission.pdf

Importance: High

Dear sir/madam, please see attached submission to the Draft Arklow Local Area Plan 2017-2023 on behalf of Yellow Lane Business Park Ltd., Presentation House, Harbour Street, Mullingar, Co. Westmeath.

Please revert to confirm receipt of submission.

Regards,

Fintan Morrin
Associate
The Planning Partnership

McHale Retail Park
Castlebar
Co. Mayo

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the planning



partnership

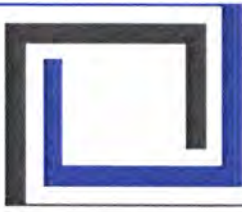
MULLINGAR - CORK - CASTLEBAR

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Registered Office: 2 Auburn Terrace, Sunday's Well Road, Mullingar, Co. Westmeath
Directors: Mark Brindley (UK), Wessel Vosloo, Fintan Morrin
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Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

B21

Friday, 18th August 2017
[By Email: planreview@wicklowcoco.ie]

DRAFT ARKLOW LOCAL AREA PLAN 2017-2023

Dear Sir/Madam,

RE: SUBMISSION IN RESPECT OF SITE AT YELLOW LANE, KNOCKANRAHAN, ARKLOW, CO. WICKLOW

1.0 INTRODUCTION

The Planning Partnership, McHale Retail Park, Castlebar, Co. Mayo are instructed by Yellow Lane Business Park Ltd., Presentation House, Harbour Street, Mullingar, Co. Westmeath to make this submission in respect of the Draft Arklow Local Area Plan, in respect of lands at Yellow Lane. The subject site measures approx. 0.96 hectares and comprises a residential dwelling and a commercial premises along with an undeveloped area of land (see Figures 1 & 2).

Our client intends to seek the redevelopment of the subject site for mixed use / convenience retail purposes, and requests that an appropriate zoning be applied to the lands accordingly. Our client confirms that discussions with a number of retail multiples have taken place in this regard. We note that the subject site currently zoned for a combination of residential, neighbourhood services and employment uses, which the current Draft Local Area Plan proposes to retain.

2.0 PROPOSED ZONING OF LANDS

As noted above, the land owner is seeking a consolidated zoning of the overall site to facilitate its assembly in terms of a planning application proposal, and the multiple zoning objective arrangement (of RE, E1 & LSS) at present is considered to be a constraint to same.

Secondly, we submit that the zoning objective of the site should reflect its location context and potential contribution to the area, as a commercial / retail development. We note that the *Local Shops and Services* objective, whilst promoting convenience retail / commercial uses, is quite constrained in terms of scale, and does not reflect the edge of centre location of the site.

Accordingly, a *Town Centre* zoning would in our opinion be more appropriate, however given that is it not contiguous with the town centre, we submit an alternative zoning objective could be appropriately applied.

For instance, a *Mixed Use* zoning objective (as is prevalent in other Wicklow plans) could acknowledge the characteristics of the site in terms of being particularly proximate to the town centre (whilst not within the town centre) and at the same time the potential of the site over and above the limitations of the *Local Shops and Services* objective. As a secondary alternative, a broadened *Local Shops and Services* objective could potentially achieve same. Further details of proposals and their rationale are set out in Sections 3.0 & 4.0 below.

Figure 1: Subject Site in Context



Source: Google Maps

Figure 2: Draft Zoning of Subject Site



Source: Arklow Draft Local Area Plan 2017

3.0 RATIONALE FOR COMMERCIAL / CONVENIENCE RETAIL DEVELOPMENT OF THE SUBJECT SITE

3.1 Shortage of Town Centre Lands Capable of Development

From a review of the proposed town centre zoning objective as mapped, we note a distinct lack of potential / opportunity sites for convenience retail and other commercial expansion. Two sites are identified along the boundary with the Avoca River, both of which are understood to have significant constraints to development / redevelopment.

The larger site 'The Alps' is understood to be in multiple ownership with substantial access / topographical constraints. The smaller site Morgan Doyle / Marine Hotel / 56 Bar is also considered to be constrained in terms of size, access, fragmented ownership, etc. Whilst both of the above sites are likely to contribute to town centre development, such development would likely be in the long term, and neither may provide an appropriate location for convenience retailing facilities.

Our client therefore proposes that the subject site be considered (in principle, and subject to the rigours of a planning application process) for convenience retail purposes.

3.2 Proximity to Convenience Retail Multiples

As illustrated in Figure 1 above, the subject site is in close proximity to the existing retail cluster of Super Valu, Lidl and Tesco, approx. 160/170 metres from Super Valu and Tesco.

No town centre lands of scale are available for retail development in this area, and accordingly, the potential expansion of the retail sector, and reversal of existing leakage from the area, is very limited as is the objective of the County Development Plan for instance.

The subject site would provide a location for same, in close / immediate proximity to established retail outlets, thereby not altering the existing balance / distribution of convenience facilities in the town.

3.3 Compliance with Sequential Approach

We consider that the subject site is an 'edge of centre' location, and as noted above the prospects of the availability of a town centre site for a modern convenience retail outlet is very particularly limited.

The *Retail Planning Guidelines, 2012* acknowledge the characteristics and requirements of such outlets *inter alia* as follows: "They provide primarily for the weekly convenience goods shopping of households. They require extensive open areas of floorspace together with adjacent car parking as the majority (but not all) their customers undertake their bulk convenience shopping trips by car. Large convenience goods stores should be located in city or town centres or in district centres or on the edge of these centres ... it may not be possible to bring forward suitable sites in or on the edge of a city or town centre because of the site requirements of large convenience goods stores, heritage constraints in historic towns, or because the road network does not have the capacity to accommodate additional traffic and service vehicles. In these cases, the sequential approach should be used to find the most preferable sites."

In addition, we note the *Retail Planning Guidelines, 2012* state: "A development on the edge of an existing centre may be consistent with sustaining and enhancing the vitality and viability of the centre if it is providing for additional choice and competition and diverting potential expenditure from less accessible out-of-centre locations to more accessible edge-of-centre locations."

4.0 DETAILED ZONING PROPOSALS

4.1 Site Consolidation

As highlighted above, our client firstly seeks that the overall site as outlined in Figures 1 & 2 above be ascribed a consistent / consolidated zoning objective, as the current mix of (RE, E1 & LSS) zoning objectives is not considered appropriate.

In addition, we submit that the subject site should be identified as an opportunity site, with convenience retailing identified as an appropriate use. As noted above, our client is actively pursuing the development of the site in this regard. We submit that this would not undermine the potential of either of the existing identified opportunity sites as they would have a different development potential, likely in the longer term.

4.2 Town Centre Zoning

The zoning of the subject site as *Town Centre* would in our opinion be appropriate given the proximity of the subject site to the town centre and retail core.

Whilst the site is not contiguous with the existing town centre, we note that a similar scenario arises in the Ferrybank area where a cluster of properties have been proposed to be zoned *Town Centre* in the *Draft Local Area Plan*. The subject proposal would therefore not create a precedent for same.

We also note the adjacent Super Valu premises, which is also not contiguous with the existing town centre, creates a further precedent (in terms of town centre retail use). Accordingly, given the local character / layout of the area and the proximity of the subject site to other retailers, the subject site could integrate into the existing town centre environment.

4.3 Mixed Use Zoning

As an alternative to a *Town Centre* zoning, we note that a *Mixed Use* zoning has been applied in other local area plans in Wicklow, for instance the *Draft Bray Municipal District Local Area Plan 2017*.

This solution could be appropriate in the context of the subject site which whilst not contiguous with the town centre 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.

4.4 Broadened Local Shops and Services objective

Finally, we submit that a revised / broadened Local Shops and Services objective may provide a framework for the development of the overall site. Whilst not the preference, it is a potential alternative.

In addition, we note this would address the inherent issues with the existing *LSS* zoning objective in relation to a number of *LSS* sites on the edge of the town centre, e.g. the existing Super Valu site. Given their location in such proximity to the town centre, it is inevitable that any retail provision on these sites will serve a wider catchment than the immediate area.

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.

A revised wording to the zoning objective would be required, for instance the following is suggested for the Planning Authorities consideration (additions underlined):

<p>LSS: LOCAL SHOPS & SERVICES</p>	<p>To provide for small scale local neighbourhood <u>and / or edge of town centre shops and services.</u></p>	<p>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; <u>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 not being of such a scale or type that would materially detract or draw trade from lands designated town centre.</u></p>
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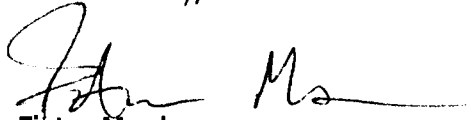
5.0 CONCLUSION

We trust the above will be taken into account in the ongoing formulation of the Local Area Plan for Arklow.

In summary, we submit that the subject site is (in principle) appropriate for retail development, or at the least eligible for consideration through the planning application process, and that there is a distinct lack of alternative town centre sites.

We submit that the zoning of the site should be revised and consolidated accordingly, to enable the potential development of the site to be progressed.

Yours faithfully,


Fintan Morrin
 Associate
 The Planning Partnership

Lisa Rothwell

From: Conor McCarthy [cmcagroup@gmail.com]
Sent: 18 August 2017 15:49
To: Planning - Plan Review
Subject: Young Coolboy Beech Rd Arklow 2017
Attachments: 17.08.17 Young Coolboy Submission Arklow Plan.pdf

Attached submission for the above,

regards,

Conor.

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Submission
on
Draft Arklow and Environs
Local Area Plan 2017
for
Allen and Marian Young

Project Reference: 17.733

August 2017

1.0 Introduction

This submission is on behalf of Allen and Marian Young, owners of a house is 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.

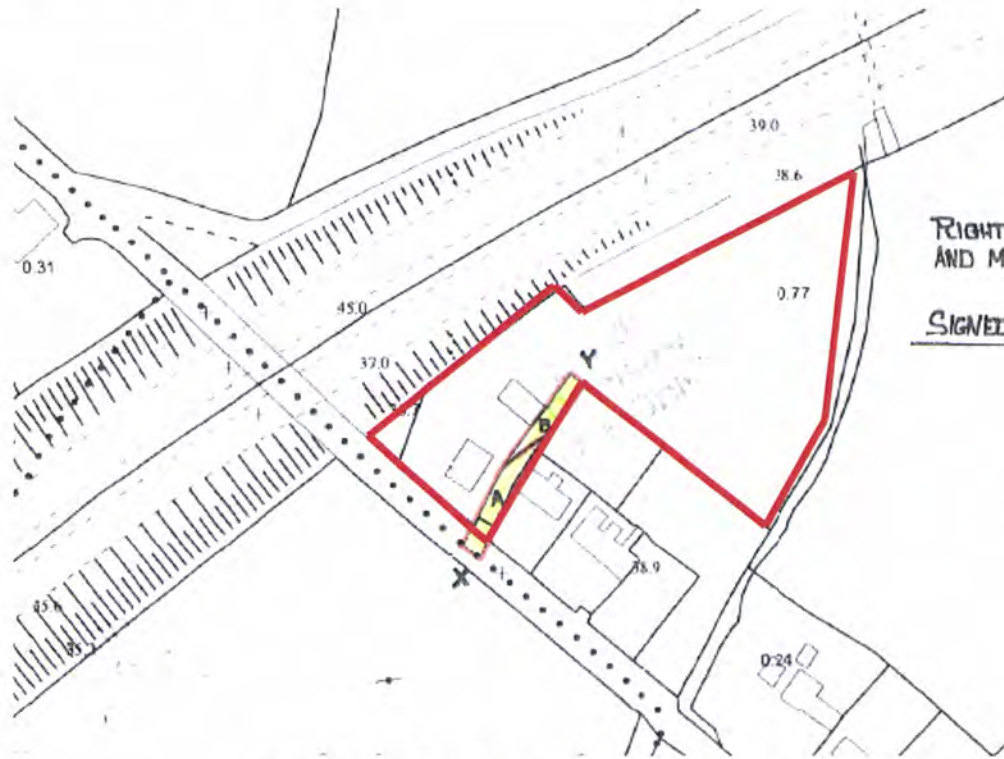
The house and garden are proposed zoned open space whilst the adjoining properties are zoned RE.



Extract Draft 2017 Plan

2.0 Submission

Our submission is that this house and gardens should be zoned, existing residential, RE within the new plan as the adjoining properties.



Extract Site Plan showing Site boundaries in red

Conor McCarthy
Chartered Engineer