

Leonora Earls

From: Maude NiBhrolchain [Maude.NiBhrolchain@housing.gov.ie]
Sent: 19 December 2017 16:52
To: Planning - Plan Review
Subject: DHPLG Submission on the Proposed Material Alterations to Draft Arklow and Environs Local Area Plan 2018-2024
Attachments: DHPLG Submission to LA 19 December 2017.pdf

To Whom It May Concern,

Please find attached submission from the Department of Housing, Planning & Local Government on the Proposed Material Alterations to the Draft Arklow and Environs Local Area Plan 2018-2024.

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

Kind Regards

Maude

Maude Ní Bhrolcháin

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Department of Housing, Planning and Local Government
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Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

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19 December, 2017

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

**Re: Proposed Material Alterations to Draft Arklow and Environs Local Area Plan
2018 – 2024**

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.

In our submission of 18th August 2017 to the Draft Arklow and Environs Local Area Plan 2017, the Department pointed out that the Arklow Local Area Plan was not in compliance with the core strategy of the Wicklow County Development Plan 2016-22.

The Department requested the insertion of additional provisions with regard to the phased development of the overall zoned lands in a manner that is consistent with the Core Strategy across the four new residential Action Area Plans.

Such an approach, which is critical for the orderly development of and investment in enabling infrastructure, is required by statutory guidelines issued by the Minister under Section 28 of the Planning and Development Act 2000 (as amended) titled *Local Area Plans Guidelines for Planning Authorities* (2013).

In this regard, the Department notes Proposed Material Alteration No.13 relating to an additional Appendix D summarising phasing arrangements for new residential development in Arklow. The *Phasing Schedule Table* indicates certain infrastructural requirements that

are linked to the four Area Action Plans identified, which include certain levels of housing provision permitted in advance of the delivery of significant infrastructural items (e.g. *50% active open space is provided in the first phase accompanied by no more than 50% of the residential development*).

The Department's previous submission also requested the Council to detail the future spatial development of Arklow as informed by the delivery of new road, water and other infrastructure.

While Objective H4 of the LAP provides that future development will '*generally be phased in accordance with the sequential approach as set out in the County Development Plan*' as referred to in the report of the Chief Executive in response to this request, the Arklow Local Area Plan remains unclear on the sequential approach to the development of the four AAP sites as requested.

Significantly scaled new residential development is included in the LAP for Arklow and clarity over the coherent spatial growth of the town is needed in order to avoid future inefficient and fragmented sprawl that would not maximise the new development derived from prioritised investment decisions.

For example, the Department notes in particular that Action Area Plan No. 3 on the northern side of the River Avoca at Kilbride has the potential to be developed for c.1100 homes (75% of the total permitted 1500 housing units) without the provision of the required strategic road link to the southwards (i.e. the Avoca River Bridge). This is a significant quantum of new housing without the identified road infrastructure and it is unclear what transport assessment or evidence base has led to this stipulation. Such development could result in a significant volume of traffic impacting on the town centre and quay areas and would be at odds with objectives in the LAP to develop and regenerate these areas.

It is also noted that the Phasing Schedule Table includes several optional phasing requirements that appear ambiguous in nature – e.g. '*Active Open Space has to be developed prior to the housing development or no more than 75% of the residential development may be constructed prior to the provision of the open space*'. It is considered that such phasing requirements should be more clearly stated to avoid any potential misinterpretation.

The Council is requested to provide, in the Proposed Material Amendments, for the appropriate prioritisation of new residential development lands within Arklow such that the growth of the town as identified in the Wicklow CDP core strategy can be realised and to allow the town to grow in a sequential and sustainable fashion to support the required infrastructural investment.

Proposed Zoning Changes

Several of the Proposed Material Alterations relate to changes to zonings in the plan at various locations including at Coolboy (MA No.2), at Money Little (MA No.3) and at the Shelton Abbey industrial site (MA No.7). These changes are relatively minor in the overall context of new zonings in the town. However, Proposed Material Alterations at Seabank and Ballynattin provide for piecemeal and speculative zonings that are contrary to national planning guidelines.

Two substantial zonings are proposed under MA No. 5 at Seabank to the north east of the town. Proposed Material Alteration No. 5 seeks to zone greenfield lands (5.9 ha) west of the R750 for Residential - Objective '*RSpecial*' to accommodate 40 new residential units (Objective H9) and also zone 5.4 ha for Objective E1 *Employment*. The site at Seabank is located outside the settlement boundary identified in the local area plan and is between 0.5-1km from the *Cluain Ard* housing estate which is the most northerly existing development on the northern eastern side of the town. Development of this isolated site would represent piecemeal and uncoordinated development of the town into the surrounding countryside and would, over time, result in a continuous stretch of development along the R750.

The Arklow LAP provides for significant existing residential and employment zonings to assist the growth of the town to the south and west and additional random zonings are not justified on the basis of need, infrastructural provision or spatial sequencing for either residential or employment development.

Similarly, substantial greenfield lands are proposed in MA No.16 for zoning as Objective T - *Tourism* development at Ballynattin. These lands are peripheral to the town and positioned west of the M11 motorway which is an identifiable western boundary to the future growth of the town. There is significant new employment/commercial zoning to the east of M11 along the R772 approach into Arklow from the south off the M11 including an Objective T - *Tourism* zoning under Proposed Material Alteration No.3. It is considered that these substantial employment zonings represent a significant addition to the town and

provide for the future sustainable employment growth of Arklow. The zoning of additional tourism development lands at Ballynattin is not justified on the basis of need, infrastructural provision or spatial sequencing of development.

The proposed zonings at Seabank and Ballynattin are ad hoc and piecemeal in nature. They are completely contrary to the statutory *Development Plans Guidelines* (2007) which clearly state that new zonings should '*extend out from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided)*' (section 4.19 of the *Development Plans Guidelines*, 2007).

Proposed Material Alterations Nos. 5 and 16 are contrary to the *Development Plans Guidelines* (2007) and your authority is requested not to adopt these alterations and thereby delete these proposed zoning objectives in the Local Area Plan.

Having regard to the significant and serious concerns of this Department to the rationale and approach adopted in the Proposed Material Alterations to the Arklow Local Area Plan, your authority is requested to take the following steps;

1. Include additional safeguards in the Proposed Material Alterations that ensure that new housing development areas are developed on a spatially sequential and phased basis that is informed by the anticipated delivery of the required enabling infrastructure.
2. Omit Proposed Material Alterations numbers 5 (Seabank) and 16 (Ballynattin)

Where your authority substantively addresses the points above, it would be unnecessary to consider the use of powers under Section 31 of the Act to ensure consistency in key legislative and policy aspects as outlined above.

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,



Niall Cussen

Principal Advisor

Forward Planning Section

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



14th December 2017,

RE: Material Alterations to the Arklow and Environs Local Area Plan

Dear Sir/Madam,

The National Transport Authority (the "NTA") has reviewed the Material Alterations to the Draft Local Area Plan and, in order to ensure the plan's consistency with the Transport Strategy for the Greater Dublin Area (the "Transport Strategy"), makes the following comments and recommendations:

1. NTA Submission on Draft Local Area Plan

The NTA welcomes the inclusion of many of the recommendations made in our submission on the Draft Local Area Plan in the material alterations. In relation to those recommendations not accepted by Wicklow County Council, we reiterate these as follows:

- 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;
- 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 recommended that the requirement for the lands zoned R20 to the south of Arklow are reviewed, with a view to their removal; and
- 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.

In the absence of the above changes, the NTA has concerns as to how the pattern of development provided for by the Draft Local Area Plan could be served in a manner which is consistent with the Transport Strategy. The NTA therefore reiterates and emphasises our previous recommendations in this regard.

The remainder of this submission relates to the Material Alterations proposed.

2. Material Alteration No. 2

As stated above, the NTA is of the view that the development of the lands at Coolboy, including those lands outside Action Area 4, would be difficult to serve in a manner consistent with the Transport Strategy. As such, the maintenance of a residual 3.46 hectares for low-density housing as proposed is not supported. All of the zoning in this location should therefore be removed.

3. Material Alteration No. 3

This alteration would lead to the development of an isolated edge-of-town site for residential development, severed from the rest of the built-up area of the town by a large Tourism development, surrounded by employment uses on its other side, and close to the M11 interchange. Such a pattern of development would not align with the principles of sequential development as set out in the Transport Strategy. As such, it is recommended that this alteration is not adopted.

4. Material Alteration No. 5

The rezoning of the rural lands at Seabank outside of Arklow for low-density residential and employment uses does not align with the Transport Strategy in terms of promoting urban consolidation and sequential development. As such, it is recommended that this alteration is not adopted.

5. Material Alterations Nos. 6 & 7

The NTA notes the zoning of an additional 7 hectares of land for Employment uses on sites on the edge of Arklow, with the smaller site having direct access to the M11. While these particular zonings may be acceptable in principle, it is essential that the impact of their development on the M11 is comprehensively assessed, with the development at Shelton Abbey assessed as part of a Masterplan.

6. Material Alterations No. 13

The NTA notes that insertion of Appendix D – Phasing and Implementation – and will work closely with Wicklow County Council in the delivery of those elements within our remit, with a view to achieving close integration between land use planning and transport planning in Arklow, consistent with the principles of the Transport Strategy.

7. Material Alteration No. 16

The rationale for the rezoning of Open Countryside to Tourism uses on a site outside the built-up area of the town with direct access to the M11 is ambiguous. In the absence of clarity on the intended intensity of use at this site, this alteration is not supported.

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

From: Marriott, Liz [liz_marriott@education.gov.ie]
Sent: 19 December 2017 16:51
To: Planning - Plan Review
Subject: Submission to Proposed Alterations to the Draft Arklow & Environs Local Area Plan 2018
Attachments: Submission from Department of Education and Skills_19December2017.pdf

To Whom It May Concern

Please see attached submission to Proposed Alterations to the Draft Arklow & Environs Local Area Plan 2018.

Kind regards

Liz Marriott
Forward Planning
Tel: 057 9325403

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Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

19 December 2017

Re: Proposed Alterations to Draft Arklow & Environs Local Area Plan 2018

Dear Sir/Madam

Thank you for your recent correspondence in relation to the above.

In the Department's submissions of 11 November, 2016 and 18 August, 2017 to the Draft LAP requests were made for an three 16-classroom primary school (expandable to 24-classroom) with special needs units and one 1,000 pupil post-primary school with special needs unit. Both submissions are attached at Appendix 1 and 2 for convenience.

Proposed Material Alteration No 1, 4 and 5

It is noted that the projected population targets remain as published previously at 23,000 by 2028. However, the Proposed Alterations to the Draft Plan provides for an increase in housing targets to 2028 and table 3.1 outlines new residential developments in Yellow Lane amounting to 19 additional units and Seabank amounting to 40 additional units.

Taking in to account the request for sites for 3 primary and 1 post-primary school previously made by the Department there will be sufficient capacity to cater for the requirement above.

Proposed Material Alteration No 2, 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16

We have noted the contents of the material alterations and have no further comment.

Yours sincerely



Liz Marriott
Executive Officer
Forward Planning

Appendix 1

Administrative Officer
Planning Department
Wicklow County Council
Station Road
Wicklow

11 November 2016

Re: Preparation of Arklow & Environs Local Area Plan 2017-2023

Dear Sir/Madam

Thank you for your email of 11 October 2016 in relation to the above. The Department of Education and Skills wishes to make the following submission.

School provision

It is important that there is sufficient educational infrastructure to meet the needs of the community. The Department has worked closely with the Council in relation to securing sites for educational infrastructure and the Department will continue to work closely with the Council in relation to the provision of new schools and the development of existing schools and emphasises the critical importance of the Council ensuring sufficient land is zoned for this purpose.

Schools may develop within the lifetime of the Local Area Plan. It is important that suitable sites, taking the documents referenced in appendix 2 of this submission into account, are zoned to cater for this provision. The Department requests that the Council consider including a specific school/education land use zoning objective and identify suitably located lands to meet the educational infrastructure needs within the Local Area Plan in accordance with *Development Plans: Guidelines for Planning Authorities, Appendix F (DEHLG, 2007)* and the Department of Education and Skills Technical Guidance Documents for primary schools and for post-primary schools.

In this regard land should be zoned where provision of services and access will not hinder the development of the school within the required timeframe. The Council is requested to consider favourable implementation strategies and phasing in the identification of school specific sites in order to ensure ready access to existing infrastructure and to avoid the risk of disproportionate costs by the Department towards such infrastructure to benefit the receiving communities.

The Department requests that site reservations are made, where possible, as close as possible to community facilities such as sports facilities, libraries etc. so that these can be shared between the school and the community. The Department is also open to

the concept of multi-campus school arrangements, for example where two or three primary schools are located side by side or a primary school and a post primary school sharing the same site. Both of these approaches can have the effect of reducing the land take for school development.

It would be strategically valuable for the educationally zoned lands to be placed beside open-space or green-belt zonings if possible, as this would allow ready access to these amenities and other aligned facilities by the schools and in the strategic long-term may future-proof these schools for possible future expansion should that be necessary.

Where possible, land adjacent to existing schools should be zoned appropriately to allow for the potential future expansion of these schools. In addition, the Council is requested to consider a policy of introducing a buffer zone around existing school sites, where possible. This would facilitate adequate separation from housing while allowing reasonable scope for increased school heights particularly in established neighbourhoods identified for consolidation or intensification of population.

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

The Department notes that the LAP will be in place from 2017 until 2023 initially and may be extended to 2027/28. The projected population targets referenced in the issues booklet provides figures for 2011 and projected target figures for 2028. Five of these 17 years have already elapsed so the additional children will already be attending the existing primary and post-primary schools. However, in relation to the additional educational infrastructure which may arise as a result of such a population increase, the growth of 9,934 would result in the need for an additional 44 classrooms at primary level and 844 school places at post-primary level. If none of these projected numbers were to be catered for in existing schools, this population growth would equate to the need for two new 16-classroom expandable to 24-classroom primary schools with special needs units. The post-primary numbers equate to one 1,000 pupil post-primary school with special needs unit. In terms of site size, a new primary school ranging in size from 16 - 24 classrooms, as a guide, requires 1.6 hectares (4 acres). A new post-primary school catering for 1,000 students would require *circa*. 4.57 hectares (12 acres approximately). It may be prudent to consider a campus arrangement for these schools and if so a site of at least 20 acres would be required. It is important therefore that sufficient lands in the areas where significant additional population is likely to arise, is zoned educational, to ensure that educational infrastructure can be put in place to meet the needs of these new communities.

Programme of Capital Investment

A new programme of capital investment in schools, listing the school projects planned to go to construction during the years 2016 to 2021 was published on the 17th November 2015. For your information, the school projects in the Arklow area included on this programme are listed in Appendix 3 to this submission.

Please see appendix 1 for details in relation to how the Department calculates educational requirements based on demographic projections from the Council; references to technical guidance and other documents which relate to educational provision at appendix 2 and the projects included in the 6 year construction programme from 2016-2021 at appendix 3. All Technical Guidance Documentation used in the design of all new school buildings and extensions are available from the Department's website www.education.ie

Demographic changes in the Arklow area will continue to be monitored on an ongoing basis and it is possible that further educational requirements may arise over the lifetime of the Local Area Plan. Accordingly it is important that sufficient land is zoned for educational use.

The Department is available to meet with Council officials to discuss in more detail the educational implications arising from the draft Plan.

If you have any queries in relation to the above or require any additional information please do not hesitate to contact me.

Yours sincerely

Veronica Kelly
Executive Officer
Forward Planning Section

Tel. No: 057-9324448

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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

Appendix 2

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 (8.9%) 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

4

From: David Galvin [d.galvin@epa.ie]
Sent: 19 December 2017 11:05
To: Planning - Plan Review
Subject: Re. Proposed Material Alterations to the Draft Arklow and Environs Local Area Plan 2018-2024
Attachments: SCP161002.3 EPA Submission Prop. Alterations to Draft Arklow Environs LAP 2018-24.pdf; SCP161002.2 EPA Submission ArklowEnvironsLAP-Cover.pdf

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

19th December 2017

Our Ref: SCP161002.3

Re. Proposed Material Alterations to the Draft Arklow and Environs Local Area Plan 2018-2024

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 22/11/2017, regarding the Proposed Material Alterations (the Alterations) to the Draft Arklow and Environs Local Area Plan 2018-2024 (the Plan) and notes its contents.

SEA Determination

our position with regard to the need for Strategic Environmental Assessment (SEA) of the Alterations is noted.

We note your screening has concluded that 3 of the 16 Alterations (Alterations Nos. 5, 7 and 16) are likely to give rise to significant environmental impacts and that these Alternatives have accordingly been subject to SEA.

Specific Comments on the Alterations

Our previous submission on the Draft Arklow and Environs Local Area Plan 2017, dated 18th August 2017, is attached and relevant aspects should be also taken into account at this time. We refer you in particular to the following recommendations in our previous submission:

- Environmental management plan(s) should be prepared to coordinate the development of the four action areas, considering aspects such as traffic management, waste management, green infrastructure integration/protection/provision, surface water management/drainage, noise etc. We note that site specific environmental assessments will be carried out where required for Alterations Nos. 5, 7 and 16. Where relevant, this could be integrated into any environmental management plans for the four action areas.
- The zoning and development of lands should be appropriate to the flood risk identified and the vulnerability of the land use to flooding, in accordance with the Planning System and Flood Risk Management Guidelines (DEHLG/OPW, 2009);

- The objectives, policies and recommendations of the Draft National Planning Framework, National Mitigation Plan, Draft National Adaptation Framework and Regional Spatial and Economic Strategies (in preparation) should be integrated as relevant and appropriate upon their adoption.

Flood Risk Assessment

We note Addendum 1 to the Flood Risk Assessment (FRA) of the Draft Arklow and Environs Local Area Plan 2018-2024.

We refer you to the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/OPW, 2009) which clearly recommends against development of vulnerable land uses in areas within Flood Zones A and B.

We note that the Addendum to the FRA concludes that the land use zoning being proposed in Alterations Nos. 5, 7 and 16 is not appropriate due to the identified flood risk. It states that suitable alternative lands are available and concludes that the justification test has failed.

In this context, we recommend that further consideration should be given to the need to develop lands in areas of moderate or high flood risk, as proposed by Alterations Nos. 5, 7 and 16. Given the availability of suitable alternative lands, we recommend that additional consideration be given to alternatives. This is particularly important in the context of climate change and predicted increases in the frequency and severity of flooding from extreme weather events and sea level rise.

You are reminded to ensure that the Alterations are consistent with the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/OPW, 2009).

Critical Infrastructure

We note that *Appendix D-Infrastructure Delivery Schedule* includes a commitment that “...once Irish Water has secured the appropriate permission for a new waste water treatment plant, new development may be permissible with an occupancy holding condition until this plant is in operation...”. We recommend that the words ‘will only be permissible’ may be appropriate in the context of ensuring that future development is underpinned by adequate and appropriate waste water treatment infrastructure.

Future Modifications to the Plan

Where future changes to the Plan are proposed, these should be screened for the potential for likely significant effects on the environment in accordance with the criteria as set out in *SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004)*.

SEA Statement – “Information on the Decision”

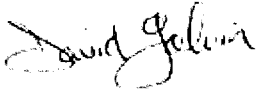
Following adoption of the Plan, an SEA Statement should be prepared that summarises the following:

- 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 also be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely,



David Galvin
Scientific Officer
SEA Section
Office of Evidence & Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

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Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

19th December 2017

Our Ref: SCP161002.3

Re. Proposed Material Alterations to the Draft Arklow and Environs Local Area Plan 2018-2024

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 22/11/2017, regarding the Proposed Material Alterations (the Alterations) to the Draft Arklow and Environs Local Area Plan 2018-2024 (the Plan) and notes its contents.

SEA Determination

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We note that the Addendum to the FRA concludes that the land use zoning being proposed in Alterations Nos. 5, 7 and 16 is not appropriate due to the identified flood risk. It states that suitable alternative lands are available and concludes that the justification test has failed.

In this context, we recommend that further consideration should be given to the need to develop lands in areas of moderate or high flood risk, as proposed by Alterations Nos. 5, 7 and 16. Given the availability of suitable alternative lands, we recommend that additional consideration be given to alternatives. This is particularly important in the context of climate change and predicted increases in the frequency and severity of flooding from extreme weather events and sea level rise.

You are reminded to ensure that the Alterations are consistent with the *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DEHLG/OPW, 2009).

Critical Infrastructure

We note that *Appendix D-Infrastructure Delivery Schedule* includes a commitment that “...once Irish Water has secured the appropriate permission for a new waste water treatment plant, new development may be permissible with an occupancy holding condition until this plant is in operation...”. We recommend that the words ‘will only be permissible’ may be appropriate in the context of ensuring that future development is underpinned by adequate and appropriate waste water treatment infrastructure.

Future Modifications to the Plan

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Following adoption of the Plan, an SEA Statement should be prepared that summarises the following:

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- 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 also be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely,

A handwritten signature in cursive script that reads 'David Galvin'.

David Galvin
Scientific Officer
SEA Section
Office of Evidence & Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork



Environmental Protection Agency
An Ghníomhaireacht um Chaoimhnú Comhshaoil

Administrative Officer
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LoCall: 1890 33 55 99

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,

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



5

Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town



Dáta | Date
18 December, 2017

Ár dTag | Our Ref.
TII17-99905

Bhuid Tag | Your Ref.

Re: Proposed Material Alterations to the Draft Arklow & Environs Local Area Plan, 2018 - 2024

Dear Sir/Madam,

TII welcomes referral of the Proposed Material Alterations to the Draft Arklow & Environs Local Area Plan, 2018 – 2024, and the following observations are provided for the Councils consideration;

The Council will be aware that the Authority identified, in TII's initial submission on the Draft Local Area Plan, that a number of development designations and specific development objectives outlined in the Draft Plan had 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.

TII identified that this requirement was 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.

Although no proposed material alterations are proposed to the Draft Plan arising from the consideration of TII's submission on the Draft Plan, clarification in relation to access proposals for the Coolboy lands outlined in the Chief Executives Report is noted. Nevertheless, 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.

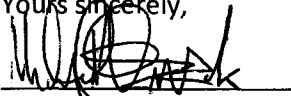
In that regard, additional zoning proposals such as Proposed Material Alteration no. 6 and proposed Material Alteration no. 16 proposing additional Employment lands and additional Tourism lands in proximity to M11 junctions 20 and 21 respectively, also do not appear to be supported by such evidence based requirements.

It remains the opinion of TII that the local area plan and relevant proposed material alterations, impacting on national roads and associated junctions, should be 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. Amendments arising from such assessment should be incorporated into the Local Area Plan prior to adoption.

Próiseáilann BIÉ sonraí pearsanta a sholáthraítear dó i gcomhréir lena Fhógra ar Chosaint Sonraí atá ar fáil ag www.tii.ie.
TII processes personal data in accordance with its Data Protection Notice available at www.tii.ie.

It is requested that the foregoing comments and observations are taken into consideration in the preparation of the Arklow & Environs Local Area Plan, 2018 – 2024.

Yours sincerely,

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

Michael McCormack
Senior Land Use Planner





Leonora Earls

From: Trevor Sadler [trevor@mcgplanning.ie]
Sent: 19 December 2017 14:17
To: Planning - Plan Review
Subject: Arklow LAP - Submission in relation to Kilbride Lands 19.12.17.pdf
Attachments: Arklow LAP - Submission in relation to Kilbride Lands 19.12.17.pdf

To Whom it Concerns,

Please see attached submission on the Material Amendments to the Arklow LAP.

I would appreciate if you could confirm receipt

Regards

Trevor Sadler
McGill Planning Ltd.

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

19th December 2017

RE: Draft Arklow Local Area Plan (LAP) 2017 – Material Amendments

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 to the Proposed Material Alterations to the Draft Arklow and Environs Local Area Plan (LAP) 2017, issued on 22nd November 2017.

Firstly our client welcomes the proposed amendments relating to their lands, namely:

1. The extension of the AA3 boundary to include the portion of the Arklow Marsh lands in their ownership.
2. The rezoning of the surplus CE land to New Residential.
3. The increase from 150 to 200 for the size of individual estates.

These amendments will help facilitate our client in delivering an Action Area Plan for the subject lands in 2018 as a precursor to a first phase of planning applications and development.

However an additional amendment raises concerns for our client as to the ability to progress the development of the Kilbride lands in the short-medium term.

The phasing section in Chapter II has been updated with Appendix D added which elaborates on the infrastructure delivery schedule and the sequential development phasing programme.

Area/Zone		Key Infrastructure to be delivered prior to the delivery of development
PHASE TWO	Action Area Plan 3	<ol style="list-style-type: none"> 1. Wastewater treatment plant <p><i>Action Area 3 Phasing - The development shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure to serve the action area and local shops & services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space and strategic road infrastructure shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).</i></p> <ol style="list-style-type: none"> 2. School site (in consultation with Dept of Education) 3. Internal road layout has to be developed prior to the housing development <u>or</u> no more than 50% of the residential development may be constructed prior to the provision of the road infrastructure. 4. Active Open Space has to be developed prior to the housing development <u>or</u> no more than 75% of the residential development may be constructed prior to the provision of the open space 5. Avoca River Bridge has to be developed prior to the housing development <u>or</u> no more than 75% of the residential development may be constructed prior to the provision of this road infrastructure <p>Note: There is a detailed phasing objective for the delivery of this Action Area set out in Chapter 11.</p>
	Action Area Plan 4	<ol style="list-style-type: none"> 1. Wastewater treatment plant

The housing/population targets for the town as set down in the core strategy is to be delivered in 6 growth areas: infill development within the town centre and waterfront, and within 4 Action Areas:

- Abbeylands (AA1) and Money Little/Big (AA2) south of the town which together will deliver 1,485 units.
- Kilbride (AA3) (the subject lands) which will deliver 1,500 units.
- Coolboy (AA4) further north of the town which will deliver 220 units

However the Phasing Schedule Table in Appendix D designates a “Phase One” comprising the Town Centre, Waterfront, AAPI and AA2; whilst AA3 (subject lands) and AA4 are indicated as “Phase Two”.

There is no explanation provided as to why the development lands are to be phased in this way, or what the phasing strategy actually means. Is it intended that Phase 2 is to be developed after Phase 1?

The preceding paragraph to the table states:

“... the phasing of development will be linked with the overall development strategy for the Local Area Plan whereby the existing settlement will expand geographically from the centre, through the development of physically adjoining lands in a coherent manner. New development will integrate with the established settlement of Arklow and will be supported by the required infrastructure provision. In order to fulfil the core strategy and the population and housing objectives of the Local Area Plan, the plan requires the key new residential areas of the town centre, waterfront, and 4 Action Area’s to be developed as part of the future growth of Arklow.”

The development of Arklow sequentially from the centre out, in all directions, is a central tenet of the Core Strategy. However the Phasing Table included in Appendix D could easily be misconstrued as intending that the town will firstly develop south from the centre (into AA1 and AA2) before development to the north (AA3 and AA4) will be considered.

That would be a retrograde and highly unsustainable measure were it true.

The current population of Arklow is already geographically skewed with triple the population living south of the River Avoca than to the north. The 2016 Census results indicate 3,013 residents in Arklow No. 2 Urban Electoral District with 9,976 in No. 1 Urban E.D south of the river.

Whilst the historic centre of the town does lie to the south the north has developed a good range of services and infrastructure to facilitate additional population. There are schools, churches and shops, most particularly the Bridgewater Shopping Centre.

Under AA3 additional schools and local retail will be provided in tandem with new housing.

Were the town to develop in the short-medium term only to the south of the town first then the imbalance in population between north and south would be further imbalanced. With AA1 and AA2 designated for 1,485 units that would equate to a residential population of over 4,000 (based on average household size of 2.75).

Notwithstanding additional development in the town centre, this means that the population south of the river would become 4 times the size of that north of the river.

The restriction on the commencement of residential development on AA3 would also delay the delivery of additional social (schools, shops) and physical Infrastructure identified in the LAP.

Given the above concerns it is naturally assumed that it is not the intention of the LAP to restrict the development of AA3 in this way but rather that incremental development of the Action Areas in unison would be delivered in accordance with the principles of sequential development.

In this regard the areas of AA3 beside the existing residential areas, local services, public transport (along the Dublin Road) and the new school site could be delivered in the short term with lands further west towards the M11 to be delivered in the longer term (most likely under a future LAP). This phasing of development within AA3 can be set down in the Action Area Plan to be agreed with the planning authority before any initial applications would be accepted.

Given the above it is requested that the table added to Appendix D be revised to remove AA3 Kilbride lands from Phase 2.

A further comment is raised in relation to list of infrastructure for delivery of AA3. It is stated that the Avoca River Bridge *“has to be developed prior to the housing development or no more than 75% of the residential development may be constructed prior to the provision of this road infrastructure.”*

We note that the bridge is a long-term and significant piece of infrastructure that may ultimately need to be delivered through state funding. Given the bridge will benefit the entire town as well as development lands south of the river and it would be unreasonable to expect our client or any one developer to fund it entirely. In this regard it is requested, in the interest of clarity that additional text be added to bullet point 5 to emphasise that the funding/delivery of the bridge will be subject to State or other similar funding mechanisms.

We trust that the planning authority will take on board this letter of support and additional comments. As previously mentioned 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: Aoife Byrne [abyrne@slrconsulting.com]
Sent: 19 December 2017 10:25
To: Planning - Plan Review
Subject: 501.00180.00141/14 Proposed Material Alterations to the Draft Arklow LAP
Attachments: 170814 501.00180.00141.14 L. Submission Draft Arklow LAP Amendments.pdf

Hello,

Please find attached a submission to the consultation on the proposed material alterations to the Draft Arklow LAP.

Many thanks,

Aoife



Aoife Byrne

Associate 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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19th December 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
PROPOSED MATERIAL AMENDMENTS 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 proposed material amendments of Draft Arklow and Environs Local Area Plan 2017 - 2023. Please also refer to the previous submission made on behalf of Roadstone on the 17th August 2017.



SUBMISSION

Previous Submission

In a previous submission date 17th August 2017, Roadstone raised matters relating to the development of the Southern Port Access Road and the development of new residential development in close proximity to its operations.

Southern Port Access Road (SPAR)

The material amendments now revise policy IT9 as follows

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

This revision is welcomed. It should be noted, however, that the current Roadstone access route is a private road; it is not a public road. 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 seek to ensure that the integrity of its asset at Arklow, including the privately owned access road, is protected.

Extractive Industry Zoning

The description of the EX zoning has been 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.

Roadstone welcomes this revision. It is noted, however, that the corresponding text on the associated map (9.1) has not been updated. This text on map 9.1 should be amended in the interest of consistency.

Action Areas

The LAP provides for two 'Action Areas', namely AA1 and AA2. These comprise previously undeveloped land that is now 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.

Previously, the zoning map provided for new residential development adjoining the Roadstone landholding. The comprehensive list of criteria in respect of the development of AA2 did not address the interaction of the existing quarry and the proposed residential development.

The zoning has now been revised to Mixed Use, which allows a more flexible approach to the uses within the overall development and adjacent to the Roadstone operation. This is welcomed; however, any forthcoming development should not adversely affect the existing and established operations at Arklow Quarry.

Roadstone will seek to ensure that any future development of AA2 does not adversely affect the integrity or operation of the Roadstone asset at Arklow.

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 proposed development in the vicinity of Arklow Quarry does not inhibit or adversely affect 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.)