

Arklow Town and Environs Development Plan 2011-2017

**Manager's Report on submissions to the
Proposed Amendments to the Draft Arklow
Town and Environs Development Plan 2011-
2017**



**Wicklow County Council and Arklow Town
Council**

***Report to the members of Wicklow County Council and
Arklow Town Council under Section 12(8) of the Planning &
Development Act 2000(as amended)***

February 2011

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SECTION 1 INTRODUCTION

1. Introduction

1.1 Statutory Background to this Managers Report

This Manager's Report forms part of the statutory procedure for the preparation of a Development Plan, as required by Section 12(8) of the Planning & Development Acts 2000 (as amended) and shall:

- (i) List the persons or bodies who made submissions or observations during the public consultation for the Proposed Amendments to the Draft Arklow Town and Environs Development Plan 2010-2017 and the Draft Environmental Report,
- (ii) Summarise the following from the submissions or observations made
 - (i) issues raised by the Minister; and
 - (ii) thereafter, issues raised by other bodies or persons,
- (iii) Give the response of the Manager to the issues raised, taking account of any directions of the members of the authority, the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

It should be noted that only the Proposed Amendments (as published) are currently open for consideration. Where submissions raise matters not related to any of the Proposed Amendments these have new issues are not evaluated in this report. Section 3.2 lists any submissions that related to issues other than the proposed amendment and gives a brief outline of the issues raised.

This report is submitted to the Members of Arklow Town Council and Wicklow County Council for their consideration as part of the process for the preparation of the Arklow Town and Environs Development Plan 2011-2017 and the associated Environmental Assessment.

Members have a period of up to 6 weeks from the date of receipt to consider this Manager's Report. The members of the authority shall, by resolution, having considered the Manager's Report, make the plan with or without the proposed amendment that would, if made, be a material alteration, except that where they decide to accept the amendment they may do so subject to any modifications to the amendments as they consider appropriate, which may include the making of a further modification to the alteration subject to the following criteria:

- (i) A further modification may only be made where it is minor in nature and therefore not likely to have significant effects on the environment or adversely effect the integrity of a European site,
- (ii) A further modification shall not be made where it relates to -
 - an increase in the area of land zoned for any purpose, or
 - an addition to or deletion from the record of protected structures

In accordance with Section 12 (14), where the planning authority fails to make a development plan within 2 years of giving notice under Section 11, the Manager shall make the plan provided that so much of the plan as had been agreed by the members of the planning authority shall be included as part of the plan as made by the Manager.

1.2 Contents & Format of this Report

This report is laid out in four sections for ease of legibility and reference as follows:

Section 1	Introduction
Section 2	Guidance for the Elected Representatives
Section 3	Evaluation of submissions and Manager's recommendations

Rather than dealing with each submission individually the submissions are grouped according to the Proposed Amendments to which they relate. Where no submissions have been received on a particular amendment, this will be indicated. Regardless of whether submissions are received on any particular amendment, the Manager will offer his opinion on the amendment and his recommendation.

Where the Manager is proposing a further modification to a proposed amendment, such modifications will be shown with new text in **green** and deleted text in **strikethrough**. The original amendments proposed will continue to be shown in **red** and **blue strikethrough**.

1.3 Strategic Environmental Assessment (SEA) & Appropriate Assessment (AA)

Strategic Environmental Assessment

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt the plan or programme. The process includes:

- Preparing an Environmental Report where the likely significant environmental effects are identified and evaluated;
- Consulting the public, environmental authorities and any EU Member states affected, on the environmental report and draft plan or programme;
- Taking account of the findings of the report and the outcome of these consultations in deciding whether to adopt or modify the draft plan or programme;
- Making known the decision on adoption of the plan or programme and how SEA influenced the outcome.

A Draft Environmental Report (ER) accompanied the Draft Arklow Town and Environs Development Plan 2011-2017 in accordance with the SEA Directive (2000/42/EC) and the Planning & Development (SEA) Regulations 2004. In accordance with the same provisions, the Proposed Amendments to the Draft Arklow Town and Environs Development Plan have been evaluated in the manner set out in the Regulations and the finding of that analysis was published with the Proposed Amendments.

Appropriate Assessment (AA)

Article 6(3) of the Habitats Directive 1992 require that any plan or project that is not directly connected with or necessary to the management of a Natura 2000 site concerned but is likely to have a significant effect on one, on its own or in combination with other plans or projects, is to be authorised only if it will not adversely affect the integrity of that site.

Screening for AA and, if screening indicates the need, AA itself must be carried out and the assessment and conclusions recorded to ensure that existing and future plans or projects not authorised if they are likely to adversely affect the integrity of a site. These safeguards are designed to ensure the conservation of Natura 2000 sites.

The requirements of the Habitats Directive in respect of plans and projects are similar in many respects to Environmental Impact Assessment (EIA) of projects, and Strategic Environmental Assessment (SEA) of plans and programmes. However the focus of AA is targeted specifically on Natura 2000 sites and their conservation objectives. Article 6(3) and 6(4) of the Habitats Directive place strict legal obligation on Member states, with the outcomes of AA fundamentally affecting the decisions that may lawfully be made.

It is basic responsibility of all agencies of the state, including Planning Authorities, to act diligently to ensure that their decisions in the exercise of their functions, as well as their actions, comply fully with the obligations of the Habitats Directive.

An Appropriate Assessment Screening Report accompanied the Draft Arklow Town and Environs Development Plan 2011-2017, which evaluated the need to carry out a full Appropriate Assessment of the draft plan. The outcome of this screening process was the determination that full Appropriate Assessment was not warranted. The Proposed Amendments to the draft plan have also been evaluated in this manner and it has been determined that subject to appropriate mitigation through the implementation of policies and objectives of the plan, impacts on Natura 2000 sites are not predicted.

1.4 Public Consultation

The Proposed Amendments to the Draft Arklow Town and Environs Development Plan 2011-2017 and report on the likely significant effects on the environment of implementing the Proposed Amendments were put on display on Tuesday 18th January 2011. Written submissions and/or observations were invited for a 4-week period ending Tuesday 15th February 2011.

The Proposed Amendments to the Draft Arklow Town and Environs Development Plan and associated documents were on display at the following location:

- The Council's website
- Arklow Town Council Office
- Arklow Library
- County Buildings, Wicklow Town

Hard copies and CDs of the Proposed Amendments to the Draft Arklow Town and Environs Development Plan were available to purchase at the Planning Counter, County Buildings, Wicklow Town or could be requested by phone/email.

1.5 List of persons or bodies who made submissions/observations for the Proposed Amendments to the Draft Arklow Town and Environs Development Plan.

ID	Name	Agent/Representative	Pages
1	Department of Environment, Heritage and Local Government	Patrick O'Sullivan	13,20,21,30
2	Greater Dublin Area Regional Authority	Patricia Potter	13,20,30
3	Department of Education & Skills	Lorraine Brennan	20
4	National Roads Authority	Michael McCormack	21,25,30
5	National Transport Agency	Owen Shinkwin	20,25,30
6	Environmental Protection Agency	Cian O'Mahony	25,27
7	Department of Communications, Energy & Natural Resources	Carmel Conaty	
8	Department of Agriculture, Fisheries and Food	Kevin Galligan	
9	Health & Safety Authority	Olivia Walsh	
10	An Bord Pleanála	Bill Coleman	
11	Office of Public Works	Kevin Byrne	30
12	Arklow Waste Disposal	Shane Byrne	30
13	Arklow & District Chamber	Freddie Millar	29,30
14	Dawnhill Properties (late submission)	Stephen Little & Associates	

SECTION 2 GUIDANCE FOR ELECTED REPRESENTATIVES

2.1 INTRODUCTION

Responsibility for making a development plan, including the various policies and objectives contained within it, in accordance with the various provisions of the Planning and Development Act 2000 (as amended), rests with the elected members of the planning authority, as a reserved function under Section 12 of the Act.

In his preamble to Development Plan Guidelines (2007), the Minister emphasises *“the decision-making role that local elected representatives, in delivering their democratic mandate, play in the making of the development plan”* and describes the importance of the elected representatives to *“have an active and driving role in the entire process, from its inception to its finalisation”*.

He further describes their duty to *“listen to and take account of the views and wishes of the communities they represent”* and to *“fulfill their responsibilities and functions in the common interest, adhering to proper planning principles and facilitating the sustainable development of their area”*.

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

The members, following consideration of the draft plan and this report, shall decide whether to adopt the draft plan, with or without amendments. This section of the report shall outline the principle issues that the elected members are required to and should consider in their decision making process.

2.2 EUROPEAN LEGISLATION

European legislation is playing a larger part than ever before in the law and decision making process at both a national and local level in Ireland. Of particular importance to this Development Plan review process are the Strategic Environmental Assessment Directive (2001/42/EC) and the Habitats Directive (92/43/EEC).

STRATEGIC ENVIRONMENTAL ASSESSMENT

Directive 2001/42/EC of the European Parliament and of the Council of Ministers introduced the requirement that SEA be carried out on plans and programmes, which are prepared for a number of sectors, including land use planning. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No.) 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of Regulations became operational on 21 July 2004.

The legislation requires certain plans and programmes, which are prepared by Wicklow County Council and Arklow Town Council - including Arklow Town & Environs Development Plan - to undergo SEA. The findings of the SEA are expressed in an Environmental Report, which was submitted to the Elected Members alongside the Arklow Town & Environs Development Plan. The Elected Members must take account of the Environmental Report before the adoption of the Plan. When the Plan is adopted a statement must be made public, summarising, inter alia: how environmental considerations have been integrated into the Plan and the reasons for choosing the Plan as adopted over other alternatives detailed in the Environmental Report.

In this regard, the likely environmental impacts of implementing the draft Arklow Town and Environs Development Plan, are described in the draft Environmental Report. The elected members considered this Report along with the Draft Plan, (and the submission of the Minister, prescribed bodies and the public and the recommendations of the Manager), in making a decision as to whether to adopt the plan. Where elected members resolve to make amendments to the draft plan, such amendments will be put through a same environmental assessment procedure, the results of which are required to be considered by the members prior to making the final decision on the amendments. If the members resolve to make a further modification to a proposed amendment, it may only be made where it is minor in nature and therefore not likely to have significant effects on the environment.

The key implication for decision makers therefore is the necessity that the environmental implications of adopting or not adopting a certain strategy or policy / objective must be taken into consideration in decision-making and this decision making process must be fully documented and open to public scrutiny.

APPROPRIATE ASSESSMENT

With the introduction of the Birds Directive in 1979 and the Habitats Directive in 1992 came the obligation to establish the Natura 2000 network of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. A key protection mechanism for these sites is the requirement to consider the possible nature conservation implications of any plan or project on the Natura 2000 site network before any decision is made to allow that plan or project to proceed.

Not only is every new plan or project captured by this requirement but each plan or project, when being considered for approval at any stage, must take into consideration the possible effects it may have in combination with other plans and projects by going through the process known as 'Appropriate Assessment' (AA). The obligation to undertake AA derives from Article 6(3) and 6(4) of the Habitats Directive and both involve a number of steps and tests that need to be applied in sequential order. Each step in the assessment process precedes and provides a basis for other steps. The results at each step must be documented and recorded carefully so there is full traceability and transparency of the decisions made. They also determine the decisions that ultimately may be made in relation to approval or refusal of a plan or project.

AA is not a prohibition on new development or activities but involves a case-by-case examination of the implications for the Natura 2000 site and its conservation objectives. In general terms, implicit in Article 6(3) is an obligation to put concern for potential effects on Natura 2000 sites at the forefront of every decision made in relation to plans and projects at all stages, including decisions to provide funding or other support.

The first stage of the AA procedure has been undertaken for the draft development plan and subsequent proposed amendments, that is, establishing whether full AA is required (this is known as 'screening'). The AA screen document was one of the documents put on display with the draft plan. This analysis concluded that full AA was not required for the draft plan or the proposed amendments thereto.

Where the members resolve to make material alterations to the draft plan they must also have regard to their obligations in this regard and will be advised, through the production of a second report, of the likely significant impacts (if any) of implementing the proposed amendments. In their final decision making process, the members must have regard to the findings of this report.

If the members resolve to make a further modification to a proposed amendment, it may only be made where it is minor in nature and therefore not likely to adversely affect the integrity of a European site.

If it can be concluded on the basis of AA that there will be no adverse effects on the integrity of a Natura 2000 site, the plan or project can proceed to authorisation, where the normal planning or other requirements will apply in reaching a decision to approve or refuse. If adverse effects are likely, or in cases of doubt, the plan (or that element thereof) may only be approved where

there are imperative reasons of *overriding public interest* (IROPI) requiring a project to proceed, there are no less damaging alternative solutions, and compensatory measures have been identified that can be put in place.

The Habitats Directive requires Member States to inform the European Commission of the compensatory measures; this enables the Commission to review whether the compensatory measures are sufficient to ensure that the coherence of the network is maintained. If the Commission is not satisfied it may take steps against the Member State up to and including litigation in the European Court of Justice. Recourse to derogation to allow a plan or project to proceed should be pursued in exceptional circumstances only, and the Minister must be informed at an early stage of any possible IROPI case.

2.3 NATIONAL LEGISLATION & POLICY

2.3.1 PLANNING & DEVELOPMENT ACTS 2000 (AS AMENDED)

The Act states as a fundamental principle, that it is enacted “to provide, in the interests of the common good, for proper planning and sustainable development” and that “a development plan shall set out the overall strategy of the proper planning and sustainable development of the area of the development plan”.

The Act is unambiguous in setting out that “in making the development plan....the members **shall be restricted to** considering the proper planning and sustainable development of the area”, “the statutory obligations of any local authority” and “any relevant policies or objectives....of the Government or any Minister of Government” (Section 12 (11)).

Section 27(1) (as amended by the new act) states that “A planning authority **shall ensure, when making a development plan..., that the plan is consistent with any regional planning guidelines in force for its area**”, while Section 28(1) states that “The Minister may, at any time, issue guidelines to planning authorities regarding their functions under the Act and planning authorities **shall have regard to** those guidelines in the performance of their functions”.

The amended Act as required under section 10(1) states that “A development plan shall set out an overall strategy for the proper planning and sustainable development of the area of the development plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question”.

2.3.2 NATIONAL SPATIAL STRATEGY 2002-2020

As expressed Government policy, the elected members must consider the provisions of the NSS in their decision making process.

The NSS is a planning framework “designed to achieve a better balance of social, economic, physical development and population growth between regions”. The strategy identifies seven regions in the Country, of which the Dublin and Mid East Regions comprise the Greater Dublin Area. The NSS sets out, at a broad national level, a spatial structure on the basis of which a more balanced regional development can be achieved and it identifies a complementary hierarchy of settlements.

In order to achieve balanced regional development, the NSS identifies that “Ireland needs to renew, consolidate and develop its existing cities, towns and villages – i.e. keeping them as physically compact and public transport friendly as possible and minimising urban sprawl, while also achieving a high quality of design in new development and refurbishment. Urban land needs to be used carefully, sensitively and efficiently. Where greenfield development is necessary it should take place through the logical extension of existing cities, towns and villages”.

Policies and programmes will be consistent with the NSS where they seek to enhance and build up economic and social activity within the national framework provided by the Strategy. Policies based on an unstructured, scattered approach to public investment and the promotion of economic activity would not be consistent with the NSS.

2.3.3 REGIONAL PLANNING GUIDELINES FOR THE GREATER DUBLIN AREA 2010-2022

The Regional Planning Guidelines (RPGs) is a policy document, which aims to direct the future growth of the Greater Dublin Area for the 12-year period up to 2022 and works to implement the strategic planning framework set out in the NSS. The vision for the GDA is as follows:

“The GDA by 2022 is an economically vibrant, active and sustainable international Gateway Region, with strong connectivity across the GDA Region, nationally and worldwide; a region which fosters communities living in attractive, accessible places well supported by community infrastructure and enjoying high quality leisure facilities; and promotes and protects across the GDA green corridors, active agricultural lands and protected natural areas,”

The settlement strategy for the GDA supports the delivery of the hierarchy through the continuity of the policy for metropolitan and hinterland areas within the GDA, focusing new housing within the existing footprint of the metropolitan areas and planning expansion of the footprint in conjunction with new high quality public transport investment; designation of multi-modal transport corridors providing enhanced public transport linkages serving key towns and linked investment in developing these designated towns in the hinterland area. A key consideration of the new RPG's is the population allocation and distribution within the GDA; the Wicklow County Development Plan 2010-2016 is fully compliant with the RPG'S, the County Development Plan distributes population allocation to the settlements within the County and as a result the Draft Arklow Town and Environs Development Plan is compliant with these figures from the RPG.

Under the Settlement Hierarchy, Arklow is located within the Hinterland area and is designated a 'Large Growth Town II', which is described as a town that is smaller in scale than other growth towns, but is a strong and active growth town, economically vibrant with high quality transport links to larger towns/city.

The Arklow Town and Environs Plan 2011-2017 has included a Core Strategy which has demonstrated how the strategy for Arklow and its environs complies with the strategic regional objectives for the town, as included in the RPG's.

Section 3 SUBMISSIONS & MANAGERS RECOMMENDATIONS

3.1 ASSESSMENT OF SUBMISSIONS & MANAGER'S RECOMMENDATIONS

THIS SECTION WILL REPRODUCE EACH OF THE PROPOSED AMENDMENTS IN FULL AS PUBLISHED AND THEN SET OUT A SUMMARY AND RESPONSE OF THE SUBMISSIONS MADE ON EACH AMENDMENT.

Amendment 1

Chapter 2 Core Strategy

Amend Chapter 2 as follows:

2.1 Introduction

The purpose of this chapter is to set out the vision for the future of the plan area and to provide a 'core strategy' for its spatial organisation over the plan period. This core strategy will be amplified and expanded upon in the seven strategic goals set out in this chapter and in the objectives of the entire plan to follow.

2.2 Vision

For Arklow town and its Environs (plan area) to be a cohesive community of people enjoying distinct but interrelated urban and rural environment; where natural surroundings and important resources are protected; where opportunities abound to live and work in a safe atmosphere, allowing people to enjoy the benefits of well paid jobs, a variety of housing choices, excellent public services, ample cultural and leisure opportunities, and a healthy environment.

2.3 Core Strategy

The purpose of the core strategy is to illustrate that the development objectives in the Town and Environs Development Plan are consistent as far as practicable, with national and regional development objectives as set out in the National Spatial Strategy 2002 – 2020 and the Regional Planning Guidelines for the Greater Dublin Area and the Wicklow County Development Plan 2010-2016.

2.3.1 Settlement Strategy

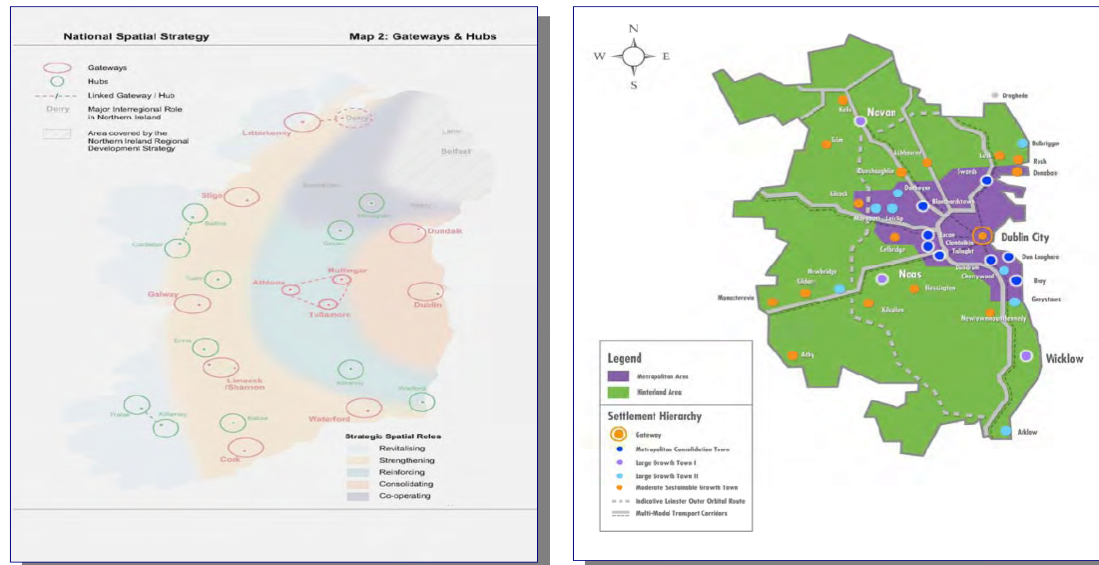
The settlement objectives for County Wicklow and for Arklow flow directly from the National Spatial Strategy and the Regional Planning Guidelines for the Greater Dublin Area as described in Chapter 1 of this plan.

National Spatial Strategy & Regional Planning Guidelines for the Greater Dublin Area

The National Spatial Strategy embodies a spatial structure of Gateways and Development Centre Hierarchy leading the development of the regions, including hubs, towns, villages and rural areas having complementary roles within the structure. The entirety of County Wicklow is located in the 'consolidation zone' around the 'gateway' of Dublin.

The Regional Planning Guidelines for the Greater Dublin Area further expand on the spatial structure in this Dublin Region.

The Wicklow County Settlement Strategy accords with both the NSS and the RPGs, as shown in the following table and maps.



Arklow is located in the Dublin centred 'consolidation zone' under the NSS, in the 'hinterland' zone of the Greater Dublin Area under the RPGs and has been identified as a Large Growth Town II under the RPGs. This development plan reinforces this designation with appropriate strategies and objectives to reflect this designation. ~~Arklow is strategically located on a national route the N11/M11. The town centre of Arklow contains a number of historic buildings and recreational green spaces in the form of parks, playgrounds and walking routes. In recent times there has been a shift away from the main street to the North Quay in terms of commercial and retail function. The main street of Arklow town is in need of rejuvenation and this plan will address this issue namely in chapter 4 "Main Street Strategy". Arklow Environs is rural in nature with dispersed housing and a concentration of industrial areas.~~

	NSS	RPGs	Wicklow CDP	Arklow Town & Environs Development Plan
Arklow	Consolidation Zone	Hinterland Area Large Growth Town II	Hinterland Area Large Growth Town II	Large Growth Town II

Arklow Town and Environs

2.3.2 Population & settlement

The population ~~and settlement~~ objectives flow from allocations made at the different strategic levels within the national planning hierarchy. The Minister allocates population to each Regional Authority, and the members of the Mid East Regional Authority in turn decide how much of their allocation goes to each county. Finally, the members of Wicklow County Council, through the County Development Plan, decide on the share of this population to be given to each settlement and town in the County.

Arklow town's population has been increasingly modestly since 1991, with annual increases in the range of 1.5 % – 2%, increasing to around 4% per annum between 2002 and 2006.

Population – Arklow Town

Year	1971	1981	1986	1991	1996	2002	2006
Population	6,948	8,646	8,388	7,987	8,557	9,993	11,759

(Source: CSO Census of population)

Having regard to Arklow's designation as a Large Growth Town II in the Regional Planning Guidelines for the Greater Dublin Area and the Wicklow County Development Plan, Arklow and its environs is targeted in the Wicklow County Development Plan to grow to 19,000 persons up to 2016 and 23,000 persons up to 2022, at a faster rate than heretofore. In particular, the population target of 19,000 in 2016 will require a growth rate of c. 6% per annum between 2006 and 2016.

Population targets – Arklow Town & Environs

Year	2006	2016 target	2022 target
Population	11,759	19,000	23,000

(Source: Wicklow draft County Development Plan 2010)

The lifetime of this plan is between 2011 and 2017. In accordance with the Development Plan Guidelines issued by the Department of the Environment, Heritage and Local Government in 2007, in order to provide a robust strategy a development plan should make provision for the zoning of land for 3 years beyond the plan period i.e. up to 2020 in this case. Interpolating back from the 2022 figure the target population for 2017 is 19,670 persons and 21,670 persons for 2020.

2.3.3 Housing & Zoning

In order to accommodate this growth, it will be necessary for this plan to ensure that adequate provision is made for zoned housing / mixed use land. Chapter 3 of this plan sets out in detail the availability of land for housing, which is summarised as follows:-

- The plan area is planned to grow to a total population of 19,000 in 2016 and 23,000 in 2022;
- It is estimated that by 2017 average household size in Wicklow will have declined to 2.52 (in accordance with the Regional Planning Guidelines). Assuming this same household size for Arklow and its environs, there would be a need for 7,800 dwelling units in the settlement by 2017;
- Further declines in household size to 2020 will necessitate a total housing stock in the settlement of 9,000 units to meet the 2020 population target (a household size of 2.4 is projected for 2020, in accordance with the RPGs);
- It is estimated that there are currently (June 2010) c. 5,250 residential units in the plan area ~~and there is currently extant permission for 980 new units;~~
- The development plan will require to make provision for ~~c. 2,770~~ c. 4,000 new housing units up to 2020;
- Three areas have been designated for significant mixed used development during the plan period these are referred to as Action Area Plans.

~~It is essential that a surplus of zoned lands is provided to take account for lands that are not released to market and land that may not be developed due to normal market friction.~~

- ~~▪ For the purposes of this plan an 'excess factor' of 7% will be utilised in accordance with the RPGs and the Wicklow County Development Plan¹. Therefore this plan must ensure a framework for the delivery of c. 2,965 residential units up to 2020;~~

¹ This term describes the fact that demand for housing will exceed actual household formation due to:

- Some of the additional units being required to replace obsolete housing;
- Some units being vacant at any one time due to market frictional factors;
- Some units being second homes or pieds à terre.

This essentially means that not all new houses in the town will result in the formation of a new "household" as (a) the new occupants may have previously resided in the town, in now obsolete housing (b) the house may be vacant or (c) the house may be a second home for someone who resides permanently elsewhere.

- ~~Additional headroom of 30% will be allowed for in this plan². In this context, the plan must ensure sufficient land is designated for c. 3,850 new residential units;~~
- Notwithstanding the zoning of land for residential purposes, the Development Management Process shall monitor and implement the population targets and shall phase and restrict where necessary the granting of residential planning permissions to ensure these targets are not exceeded;
- Housing development shall be managed and phased to ensure that infrastructure and in particular community infrastructure is provided to match the need of the new residents.

2.3.4 Infrastructure

Roads

The plan area is served by one national route - the N11/M11. The N11 / M11 is part of Euroroute 01 and has undergone significant investment in the last 20 years. The final section of dual carriageway between Bray to the north and the Wexford to the south is due to be completed within the lifetime of the plan – the Ballinabarney to Arklow Scheme. Having regard to the limitations of the mainline route in the County (see below), the N11/M11 will continue to be the principal access corridor in the eastern side on the County.

The plan area is served by a network of regional and local roads, which are essential for inter-county traffic and local movements.

- In light of the likely continuing car dependency to access the metropolitan region in the short to medium term, it is the strategy of this plan to facilitate and encourage measures to improve capacity and efficiency of the national routes and facilitates the improved use of the national routes by public transport;
- The priority for regional road improvement will be the east-west connector route i.e. the R747 (Arklow – Tinahely – Baltinglass).

Rail

The plan area is served by one mainline – the Dublin to Rosslare route and there is a functioning train station in the town.

- It is the strategy of this plan to encourage and facilitate significant improvements to rail infrastructure.

Water Services

Waste Water

The plan area is deficient in wastewater services. This lack of services is preventing the plan area from fulfilling its functions under the NSS and the RPGs as developments will be restricted due to the absence of waste water infrastructure in the plan area.

- It is the strategy of this plan to facilitate significant improvements to waste water infrastructure within the town.

Water Supply

The plan area is currently deficient in water services, however there is a replacement scheme in progress that will see most of the water being sourced from 16 new wells.

- It is the strategy of this plan to facilitate significant improvements to water infrastructure within the town.

Economic Development

In accordance with the role that Arklow has been designated by the RPG's as a Large Growth Town II it is considered that the level of enterprise and employment development has not kept pace with residential development;

² 'Headroom' or 'market factor' is the amount of extra land that should be zoned over and above the minimum amount needed to accommodate population targets, to allow for lands that are not released to the market for a variety of reasons over the plan period

- It is the strategy of this plan to increase the quantity and range of quality employment opportunities in Arklow;
- It is the priority of the plan to promote enterprise and innovation, particularly in services and the knowledge and green industries;
- It is the priority of the plan to ensure that strategic reserves of land are available for employment purposes.

Social Development

The plan area has a range of social and sporting facilities, buildings and clubs that cater for the large population of the plan area. New residential developments within the plan area shall make provision of social and recreational facilities.

- It is the strategy of this plan that sufficient lands are reserved for community uses;
- The expansion of the residential development shall be managed appropriately and commensurate with the community facilities available;
- It is the priority of this plan to ensure that the delivery of new community facilities as part of development proposals.

2.3.5 Retail

The County Development Plan for Wicklow includes a retail strategy for the entire County, which is consistent with the GDA Regional Retail Strategy. In accordance with the Retail Planning Guidelines, the retail strategy for Arklow includes the following:

- Definition in the plan of the boundaries of the core shopping area of the town centre;
- A broad assessment of the requirement for additional retail floorspace;
- Strategic guidance on the location and scale of retail development;
- Preparation of policies and action initiatives to encourage the improvement of the town centres;
- Identification of criteria for the assessment of retail development.

2.4 Key strategic objectives

In order to implement this vision and core strategy, it is necessary to set out a number of strategic objectives that will underpin all the objectives of this plan;

- To facilitate and encourage the growth of employment, enterprise and economic activity in the plan area, across all economic sectors and in all areas;
- To enhance existing housing areas and to provide for high quality new housing, at appropriate locations and to ensure the development of a range of house types, sizes and tenures in order to meet the differing needs of all in society and to promote balanced communities;
- To maintain and enhance the viability and vibrancy of Arklow as a major urban centre, to ensure that the town remains at the heart of the wider community and provides a wide range of retail, employment, social, recreational and infrastructural facilities;
- To protect and improve Arklow Town and Environs transport, water, waste, energy and communications infrastructure, whilst having regard to responsibilities to respect areas protected for their important flora, fauna or other natural features;
- To promote and facilitate the development of sustainable communities through land use planning, by providing for land uses capable of accommodating community, leisure, recreational and cultural facilities, accessible to and meeting the needs of all individuals and local community groups, in tandem with the delivery of residential and physical infrastructure in order to create a quality built environment in which to live;
- To protect and enhance the diversity of the plan area's natural and built heritage;
- To address the climate change challenge, as a plan dynamic, throughout the plan area, directly in the areas of flooding and renewable energy, and indirectly by integrating climate change and sustainable development into statements of plan policy, strategies and objectives.

Submission Received

No.	Name	Issues raised
1	DoEHLG	<ol style="list-style-type: none"> 1. A 'core strategy' map should be provided as required by Section 10(2B) of the planning Act (as amended). 2. A table setting out the amount and capacity of zoned land should be provided as recommended in Appendix 2 of the Department's "Guidance Note on Core Strategies".
2	GDA - RA	<ol style="list-style-type: none"> 1. The reference in the Core Strategy to the National Spatial Strategy & Regional Planning Guidelines for the Greater Dublin Area is welcomed. 2. The settlement strategy set out in the draft plan, as proposed to be amended, is considered to be aligned with the population targets established within the Wicklow County Development Plan for Arklow. 3. A 'core strategy' map should be provided as required by Section 10(2B) of the planning Act (as amended).

Managers Opinion

As a result of the submissions at the Draft Plan stage there were two maps inserted into the proposed amendment illustrating the location of Arklow in the settlement hierarchy, and the public transport links around the town. However it is noted that the core strategy map containing more detailed information in relation to Arklow town and its environs is required.

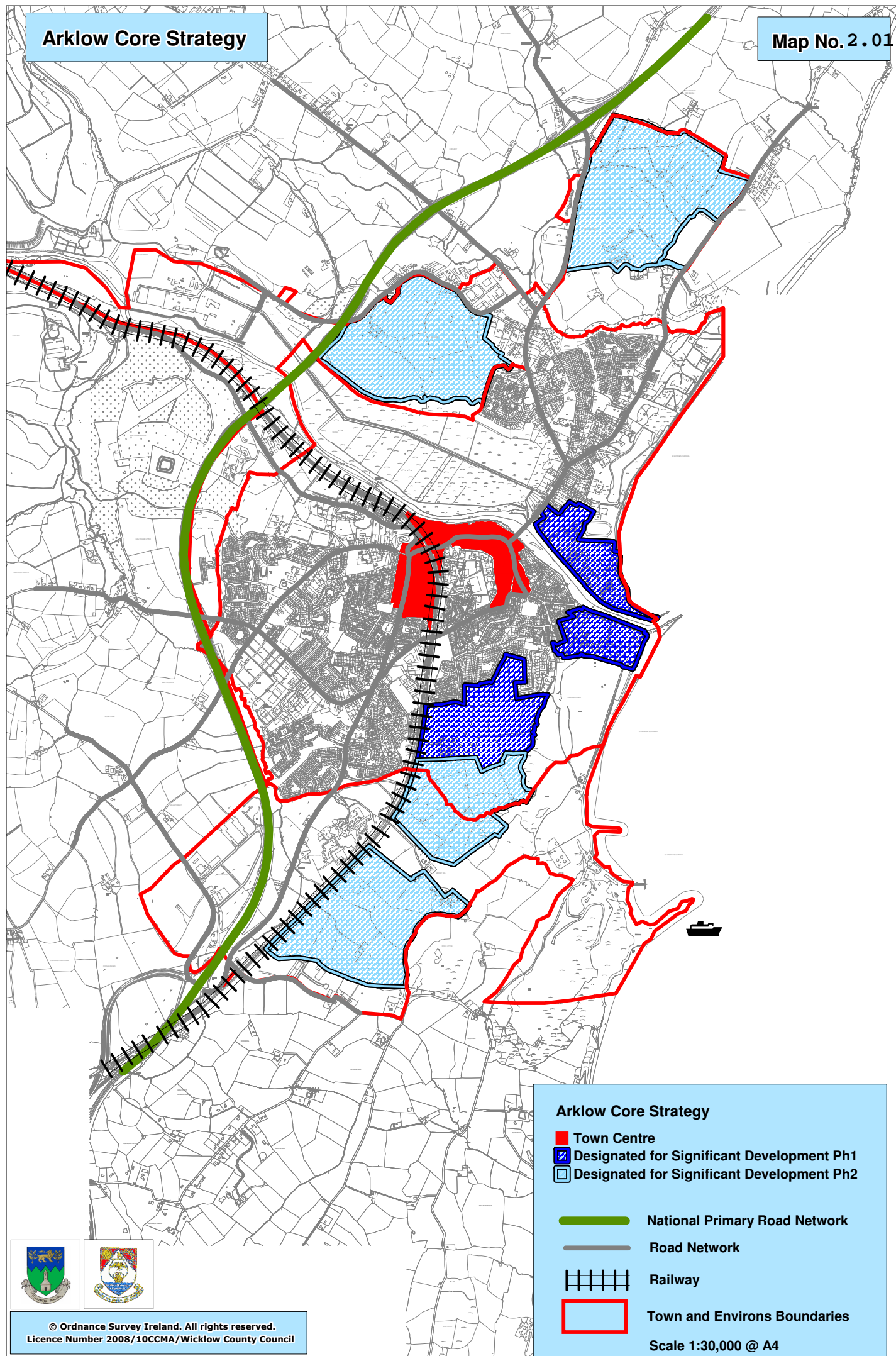
In regard to the requested 'core strategy table' as set out in Appendix 2 of the Department's "Guidance Note on Core Strategies", this is simply a recommended way of expressing a 'core strategy'. The information recommended to be contained in said table is already included in the draft plan (as proposed to be amended) and therefore it is considered that the plan will meet the 'core strategy' requirements of the Planning and Development Act.

(It should also be noted that the DoEHLG circular regarding these new guidelines was only circulated after the issuing of the Managers Report on the Proposed Amendments on the 19th November 2010).

Manager's Recommendation

Accept Proposed Amendment No. 1 and make the following further modification to the Proposed Amendment:

- Addition of a 'core strategy' map
-



Amendment 2

Chapter 3 Settlement and Housing Strategy

Amend Chapter 3 as follows:

3.1 Introduction

This development plan shall have duration of 6 years from 2011 to 2017. The Arklow population target for 2017 is extrapolated from the Wicklow County Development Plan targets for Arklow for 2016 and 2022.

Table 3.1 Wicklow County Development Plan 2010-2016 - population targets for Arklow 2016 and 2022

Year	2006	2016	2022
Arklow	11,759	19,000	23,000

Table 3.2 Arklow and environs Development Plan 2011-2017 - population targets 2017 and 2020

Year	2017	2020
Arklow	19,670	21,670

A population target for 2020 has also been extrapolated for 2020 in accordance with the 'Development Plan Guidelines' published by the DoEHLG in 2007, which recommend that development plans should make provision for zoning for at least 3 years beyond the lifespan of the plan³.

3.2 Demand for new housing

The 2006 Census revealed a total of 4,270 households in Arklow 'town', equating to an average household size of 2.75, which was below the County average of 2.89. It is estimated that (as of June 2010) there are 5,250 housing units in the entire settlement, the additional number being made up of:

- (a) additional units completed post 2006, and
- (b) units in the 'environs' area, which would not have been considered part of the 'town' in the Census, but are included in the new development plan area.

It is estimated that by 2017 average household size in Wicklow will have declined to 2.52 (in accordance with the Regional Planning Guidelines). Assuming this same household size for Arklow and its environs, there would be a need for 7,800 dwellings units in the settlement by 2017.

Further declines to 2020 will necessitate a total housing stock in the region of 9,000 units to meet the 2020 population target (a household size of 2.4 is projected for 2020, in accordance with the RPGs).

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

Table 3.3 Predicted housing need

	Number of households in 2010	Number of households in target year	Household growth required	Number of new residential units required
2017	5,250	7,800	2,550	2,700
2020	5,250	9,000	3,750	4,000

~~There are currently extant permission for c. 980 residential units in Arklow and its environs, that are either under construction or yet to commence. While some of these units may not be delivered, for the purposes of determining how much land requires to be designated for future residential development, it is assumed that these permissions will be delivered, or development of a similar quantum on the same sites should permissions expire.~~

~~Therefore the new development plan requires to make provision for c. 2,770 new housing units up to 2020.~~

~~'Excess & 'market' factor'~~

While it has been calculated that c. ~~2,770~~ 3,750 new residential units will be required ~~up to 2020~~ to meet the needs of a total population of 21,670, the plan must make provision for more than this minimum number to allow for housing that becomes obsolete during the lifetime of the plan, homes that are used as second homes in plan area and for normal market friction which means that some houses will be vacant due to market factors. This is known as the 'excess factor'. For the purposes of this plan an 'excess factor' of 7% will be utilised in accordance with the provision of the RPGs and the Wicklow County Development Plan.

Therefore this plan must ensure a framework for the delivery of c. ~~2,960~~ 4,000 residential units ~~up to 2020.~~

~~Headroom or 'market factor' is the amount of extra land that should be zoned over and above the minimum amount needed to accommodate population targets and is intended to allow for that element of zoned land that may not be released to the market for housing purposes during the Plan period. While it could be argued that by making provision for zoning for 3 years beyond the lifetime of that plan allows for this 'headroom' it is considered prudent given the current blockages in the release of zoned land in Arklow, additional headroom of 30% will be allowed for in this plan⁴. In this context, the plan must ensure sufficient land is designated for c. 3,850 new residential units.~~

3.3 Residential zoning

3.3.1 Capacity of undeveloped existing zoned land ~~(with no planning permission)~~

Town Centre

While the town centre of Arklow (i.e. that area zoned TC), is densely developed, there are numerous opportunities for redevelopment and infill development, particularly backlands of Main Street properties. Having regard to the high density of development that could be considered on such sites, it is estimated that there is capacity for up to 200 new residential units in the town centre.

Existing developed residential areas (RE)

Within the existing developed residential areas potential development sites range from small gap infill, unused or derelict land and backland areas, side gardens of existing houses, up to

⁴ This is at the lower end of the range for headroom suggested in the (draft) RPG'S 2010-2022.

larger vacant sites within established residential areas. While it is considered that higher residential densities are appropriate in the town core, an appropriate balance is required in the protection of the amenities and privacy of adjoining properties, the protection of established character and the requirement for residential infill developments. Proposals for such infill development will generally be permitted where it can be clearly demonstrated that the proposal respects the existing character of the area and would not have an adverse impact on the amenity value of properties in the area. It is estimated that there is capacity on such sites for up to 50 units.

Waterfront Development Zone

Within the waterfront area of Arklow there are a number of under-utilised or derelict sites which have the capacity for significant and high density development. The ground floors of development on these sites may be suitable for an element of commercial or community facilities, it is likely that residential will be the primary use of any development in this area, particularly given its attractive location proximate to the town centre and to water amenities. In total, there is c. 8.25ha that may be available for redevelopment and assuming a plot ratio of 2.5, this area may have capacity for up to 2,000 units (of 100sqm each). ~~However it is considered somewhat unrealistic to plan for thousands of apartment units in Arklow, given its location in the region and the County, and the demographic make up of the town.~~ For the purposes of this plan, and given the amenity/leisure potential of some of these lands, this will be reduced to ~~4,000~~ 800 units. It is noted that parts of the waterfront area may be susceptible to flooding, particularly the area around the former Qualceram site on the south side of the river and the area north of the river (see Chapter 8 in relation to flooding). However, the Flood Justification Test carried out as part of this plan justifies the designation of this land for future residential development and leisure facilities (subject to certain design controls) having regard to the close proximity to the town centre zone.

New Residential Zones (R1)

There is ~~c. 30 hectares a limited quantum~~ of existing zoned residential land in the plan area ~~without extant permission~~. These lands are dotted around the settlement, the largest blocks being located at Knockmore and Ballyraine. ~~These lands total 15ha and taking~~ It is estimated that these lands have development capacity of c. 600 units taking an average density of 20/ha ~~is assumed~~ given the edge of settlement location.

Action Areas

There are three Action Areas identified in the plan area – two at Tinahask and one at Kilbride, which were included in the previous development plans for the town and environs respectively. These areas are suitable for a high proportion of the new residential development required in the plan area.

Summary of residential zonings

In order to meet the housing needs of the plan area up to ~~2020~~ 2017, the plan will make provision for new residential development at the following locations and densities:

Table 3.1 Location of residentially zoned land

Location	Proposed Zoning	Units
Infill	TC / RE	250
Waterfront zone	WZ	1,000
Kilbride action area	AA	1,500
Tinahask action area	AA	800
Various	R1	300
Total		3,850

Table 3.4 Residential zoning

Location	Zoning	Capacity	Phase
Infill - various	RE / TC	250	1
Waterfront zone	WZ	800	1
Residential consolidation - various	R1	600	1
Tinahask – Abbeylands AA	AA	500	1
Tinahask - Money Big AA	AA	350	2
Kilbride AA	AA	1,500	2
Total		4,000	
Phase 1 (2011-2017)		2,150	
Phase 2 (post 2017)		1,850	

In addition an area of 5.6ha at Seabank is designated for low density, local need housing (R2).

3.3.3 Phasing

The development of zoned lands shall be permitted on a phased basis as set out in Table 3.4. If developed to their full capacity, the lands in Phase 1 would meet all of the housing needs up to 2017 i.e. the duration of the plan. Phase 2 lands therefore are only required for development pre-2017 if:

- Phase 1 lands don't deliver the quantum of development as envisaged in Table 3.4;
- Some barrier impedes the development of Phase 1 lands, that does not affect Phase 2 lands;
- Phase 1 lands are not released to the market during the plan period.

In this regard, Phase 2 lands will be considered for development **in 2014** if it can be shown that Phase 1 lands will not be able to deliver the number of new homes required to meet the population goal for the plan period with regard to the three reasons set out above.

Table 3.2 3.5 Summary of zoning objectives

Zoning Objectives	
TC: Town Centre	To protect and provide for the development and improvement of the town centre.
RE: Existing Residential	To protect, provide and improve residential amenities.
R1: New Residential	To provide for new residential development
R2 New Residential	To provide for low density housing (maximum 4 acre) for those living permanently for a period of at least 3 years in the area within 10km of the site prior to seeking of permission / purchase of a house in this zone.
Water Development Zones	To provide for the development and improvement of the waterfront zone including residential, commercial, leisure and amenity use.
Action Area Plans	To provide mixed-use development in accordance with the objectives set out in Action Areas 1, 2 and 3.

3.2 3.4 Settlement Objectives

- H1** To ensure sufficient zoned land is available in appropriate locations capable of meeting the housing needs of the projected population of the plan area over the plan period in a sustainable manner.
- H2** Notwithstanding the zoning of land for residential purposes, the Development Management process shall monitor and implement the population targets and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded.
- H3** Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new residents.
- H4** Encourage in-fill housing developments, the use of under-utilised and vacant sites and vacant upper floors for accommodation purposes and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.
- H5** The development of zoned land shall be phased to ensure lands closest to the centre or to existing transport and / or community infrastructure is developed prior to more outlying lands, unless exceptional circumstances apply.

Submission Received

No.	Name	Issues raised
1	DoEHLG	While Section 3.3.3, which sets out three conditions under which Phase 2 lands would be required for development, it is suggested that an additional condition would be added, namely that of 75% or more of the Phase 1 lands are developed.
2	GDA - RA	The amendments in relation to the settlement strategy are considered acceptable and are aligned with the population targets established within the Wicklow County Development Plan 2010-2016.
3	Department of Education and Skills	Proposed amendments to the indicative population figures require the provision of an additional 40-classroom primary spaces and an additional post primary school for the area.
5	NTA	<ol style="list-style-type: none"> 1. The inclusion of a residential phasing scheme in Chapter 3 and especially Section 3.3.3 and Table 3.4 is welcomed. 2. It is suggested that an additional objective be included in Section 3.3.3. to strengthen the implementation of Objective H5, by adding the following text: <i>"In addition to this, the release of the Phase 2 lands and the associated quantum of housing units will need to demonstrate consistency with the housing growth targets up to 2016 specified in table 4.4 b of the Wicklow County Development Plan 2010-2016 and any amendment of these growth targets following any revision RPG growth targets."</i>

Managers Opinion

The submission from the DoEHLG has been noted and is considered reasonable, as it would allow Phase 2 to be initiated once 75% of the Phase 1 was developed.

With regard to the NTA submission, it is considered that the growth targets and associated phasing provisions are consistent with the targets set out in the Wicklow County Development Plan but in the event of any revisions to the County targets, associated amendments will be made to this plan.

The submission from the Department of Education has been noted. This is not understood, as the population figures have been reduced by this amendment and thus no change is recommended.

Manager Recommendation

3.3.4 Phasing

The development of zoned lands shall be permitted on a phased basis as set out in Table 3.4. If developed to their full capacity, the lands in Phase 1 would meet all of the housing needs up to 2017 i.e. the duration of the plan. Phase 2 lands therefore are only required for development pre-2017 if:

- **More than 75% of the lands in Phase 1 are developed;**
- Phase 1 lands don't deliver the quantum of development as envisaged in Table 3.4;
- Some barrier impedes the development of Phase 1 lands, that does not affect Phase 2 lands;
- Phase 1 lands are not released to the market during the plan period.

In this regard, Phase 2 lands will be considered for development **in 2014** if it can be shown that Phase 1 lands will not be able to deliver the number of new homes required to meet the population goal for the plan period with regard to the three reasons set out above.

Amendment 3

Chapter 5 Transport

Amend section 5.8.3 Public Roads as follows:

5.8.3 Public Roads

National Road and Regional Road Development Control Objectives

- Any works carried out on national and regional roads shall comply with the National Roads Authority publication 'Design Manual for Roads & Bridges as may be amended and revised, unless local conditions determine otherwise;
- No development shall be permitted that would involve direct access to or from a motorway in accordance with Section 46 of the Roads Act (1993);
- ~~▪ A new means of access onto a national road will generally not be permitted, but may be considered where a new access is intended to replace an existing deficient one;~~
- A new means of access onto a national road will generally not be permitted, but may be considered if one of the following circumstances applies:
 - the national road passes through a designated settlement and a speed limit of less than 50km/h applies;
 - where the new access is intended to replace an existing deficient one ^{FOOTNOTE.}
 - where exceptional circumstances apply, as described in Section 3.2.6 of the NRA 'Policy Statement on Development Management and Access to National Roads' (NRA May 2006).

Footnote: This does not imply that permission will be granted for additional vehicular movements onto the national road on the basis that the existing access is being improved.

Submission Received

No.	Name	Issues raised
1	DoEHLG	This section makes reference to the NRA ' <i>Policy Statement on Development Management and Access to National Road</i> ' (May 2006). It would be more appropriate if the reference were to the ' <i>Draft Spatial Planning and National Roads</i> ' guidelines (June 2010) or any subsequent variations of these guidelines.
4	NRA	<p>1. The NRA welcomes the clarification provided by the second bullet point of the proposed amendment.</p> <p>2. The NRA draws attention to the fact that Section 3.2.6 of the NRA '<i>Policy Statement on Development Management and Access to National Roads</i>' does not in fact set out criteria to be applied in the consideration of applications for individual access points onto the national road, but rather it addresses criteria that should be utilised when designating land for development that is dependent on access to the national road. Therefore it is advised that this part of the amendment be reviewed.</p> <p>3. In this regard, it is advised that any exceptions to the control of development accessing the national road should only be brought forward in a plan led approach in consultation with the NRA.</p>

Managers Opinion

It is noted that the reference to Section 3.2.6 of the NRA '*Policy Statement on Development Management and Access to National Roads*' is not wholly appropriate and it is also agreed that new means of access on the national road should generally only be considered where the necessity of such access has been determined through the plan making process.

With regard to the "*Spatial Planning and National Roads*" (Draft) Guidelines for Planning Authorities, it is not possible at this stage of the planning making process, which is strictly concerned with the Proposed Amendments alone, to include new references to these draft guidelines. In addition it is questionable whether guidelines that are only in draft should be inserted into a 6-year plan.

As set out in the previous Manager's Report, the DoEHLG published the "*Spatial Planning and National Roads*" (Draft) Guidelines for Planning Authorities on the 28th June 2010. While it is noted that the Minister has stated that "*Pending finalisation of the guidelines, local authorities are requested to have regard to the recommended approach in the draft guidelines, when preparing or varying development plans and local area plans, and in regard to applications for planning permission*", these guidelines had not been published when the proposed draft plan issued to the elected members of Arklow Town Council and Wicklow County Council received the Draft Plan on the 4th June 2010. Therefore it was not possible to integrate the recommendations of these proposed new guidelines into the draft plan. To do so now, given the onerous requirements set out in the draft guidelines with regard to traffic assessments, would essentially require the cessation of the current process and a 're-start' on the plan as the amendments that would be required to the draft plan would essentially comprise a new plan rather than an amended plan. Clearly this is not feasible as the new plan is required, under the provisions of the Planning Acts, to be made within 6 years of the previous plan.

Manager's Recommendation

5.8.3 Public Roads

National Road and Regional Road Development Control Objectives

- Any works carried out on national and regional roads shall comply with the National Roads Authority publication 'Design Manual for Roads & Bridges as may be amended and revised, unless local conditions determine otherwise;
- No development shall be permitted that would involve direct access to or from a motorway in accordance with Section 46 of the Roads Act (1993);
- ~~A new means of access onto a national road will generally not be permitted, but may be considered where a new access is intended to replace an existing deficient one;~~
- A new means of access onto a national road will generally not be permitted, but may be considered if one of the following circumstances applies:
 - the national road passes through a designated settlement and a speed limit of less than 50km/h applies;
 - where the new access is intended to replace an existing deficient one ^{FOOTNOTE.}
 - ~~— where exceptional circumstances apply, as described in Section 3.2.6 of the NRA '*Policy Statement on Development Management and Access to National Roads*' (NRA May 2006).~~

Footnote: This does not imply that permission will be granted for additional vehicular movements onto the national road on the basis that the existing access is being improved.

Amendment 4

Chapter 6 Economic Development, including Retail & Tourism

Amend section 6.5 Employment Requirements as follows:

6.5 Employment Requirements

~~In order to achieve a 75% 'jobs ratio' for the plan area (which is the County target for 2022), it would be necessary to have c. 8,500 jobs available in Arklow in 2022 (given the target population of 23,000 in 2022).~~

~~However, Arklow provides an employment function for the entire south Wicklow region, and therefore provision must be made for the employment needs of an area wider than the town and its immediate environs — in this regard, it is considered that provision should be made for the employment needs of up to 35,000 people by 2020, which would equate to c. 13,000 jobs.~~

~~As set out above, in 2006, there were only c. 3,845 jobs in the town. Therefore a considerable expansion of employment is required for Arklow to fulfil its role as set out in the RPGs and Wicklow County Development Plan. While the provision of new employment will be dependent on numerous factors such as the economy, changing consumer demand, funding, suitable premises etc., this plan, being a land use plan, can only influence those factors relating to the use and servicing of land.~~

~~This plan will ensure that sufficient land is zoned and suitable objectives put in place to allow for significant employment creation, in the order of 9,000 new jobs.~~

While this plan is for the period 2011-2017, it is considered that employment 'planning' should be carried out for a longer time frame, to allow for both the planning of infrastructure and to bring certainty for potential employers. In this regard, the plan considered the needs of the settlement up to 2022.

In 2022, it is planned for Arklow to have a population of 23,000 persons. In accordance with the role envisaged for Arklow in higher order plans such as the National Spatial Strategy 2002 – 2020, Regional Planning Guidelines for the Greater Dublin Area 2010-2022 and the Wicklow County Development Plan 2010-2016, Arklow will become a major hub for employment in the south Wicklow region. While it is acknowledged that the proximity of the town to strategic transport corridors to the metropolitan region will continue to draw workers to the metropolitan area, it is considered that there should also be a considerable inflow of employees from central, south and south-west Wicklow, with Arklow being the major service centre for this large area. It is an inherent objective of the Plan to facilitate citizens' employment as close as possible to where they live.

In this regard, this plan makes provision for an employment 'catchment' of 35,000 persons by 2022, which is not considered unreasonable given the likely population of the area within 20km of Arklow in 2022, including all of Arklow and its environs (c. 23,000 persons), the towns of Aughrim, Tinahely, Carnew and Shillelagh in the south-west (a combined 2022 population of c. 6,000) and towns such as Avoca, Rathdrum and Ballinaclash to the north-west (combined 2022 population of c. 6,000 persons), the residents of the north Wexford area who would be attracted to employment opportunities closer to home (compared to the metropolitan region) and the population of all the rural areas in between.

Taking this combined 'catchment' of 35,000 and assuming that 2006 age breakdown and the labour force participation rate trends will continue up to 2022, there would be a demand for 17,290 jobs in this sub-region of the County in 2022.

The Wicklow County Development Plan aims to put in place an employment strategy that would allow an average 'jobs ratio' of 75% across the entire County (the jobs ratio is the ratio of jobs in the County to the number of people, resident in the County in the Labour Force). Clearly there

would be a range of 'jobs ratios' in different settlements / areas of the County having regard to the size of the settlement, proximity to a major town or the metropolitan area. Given Arklow's role as the major hub in this area, it is assumed that Arklow could provide the equivalent of 90% of the jobs required by its resident population by in 2022 and assuming the surrounding more rural areas achieve a jobs ratio of 50%, there would be a need to plan for c. 13,000 jobs in Arklow by 2022.

In 2006, at a time of high employment and occupancy of existing employment premises, there were 3,845 people at work in Arklow. It is assumed that these work places still exist, even if they are not fully occupied at the time of writing this draft plan due to the downturn in the economy. It is assumed that these work places could be brought back to full occupancy in the future. Therefore the draft plan makes provision for 9,000 new jobs through the zoning of sufficient lands to create this number of jobs.

Section 6.6 factors influencing employment creation

(i) Availability of Zoned Land

One of the key enablers to attract potential investment and employment to Arklow will be the availability of appropriately zoned lands. Within the plan area there is:

- c. 110ha of developed employment land
- c. 85 ha of undeveloped zoned employment land with current permission
- c. 135 hectares of zoned employment land with no permission

(Note: This solely relates to lands zoned for employment such as industrial, warehousing and commercial and does not take into account on other lands zoned for town centre, retail or leisure and amenity uses).

Of the 110ha of currently developed employment land, there is a significant block of 44ha (the land formerly occupied by the IFI plant), which has the potential for substantial redevelopment and employment growth. Other sites, while built out, do have a number of smaller scale infill and redevelopment possibilities. It is assumed that up to 1,000 future jobs could be generated on this 110ha.

The 85ha of employment-zoned land with permission has the capacity to generate up to 8,500 jobs assuming a mix between low-density employment uses (such as warehousing) and high density uses such as offices, which are allowed by the various permissions in place (i.e. employment density of 100 employees per hectare).

Combining these zoned areas, there is potential to accommodate the required growth in employment in the plan area, over the plan period. However, in accordance best practice, it is necessary to allow 'headroom' or 'market factor' in employment zoning, to allow for lands that are not released to the market for development. It is the experience over the past two decades that lands zoned for employment are slow to be taken up, far slower than the take up for residentially zoned lands.

In this regard, three additional blocks of employment land are provided in the plan area, two at Killinskyduff and one at Tinahask. Of these three, two are significant blocks (measuring 76.11ha at Killinskyduff and 56.56 ha at Tinahask) which are identified to provide for a particular type of employment provision, that is, to provide for large, single, undivided employment development, such as 'direct foreign investment' businesses, including microchip or similar manufacturing plants and would be likely to appeal to multinationals or significant IT (such a data centres) / green technology / pharmaceutical industries. It is considered necessary to reserve such strategic blocks of land in to ensure that Arklow can attract such employers and comply with its role as set out in the RPGs. Where permission is sought for a strategic, large scale development of this nature during the lifetime of the plan, it will be facilitated. However, where 'business park' type use is desired (which is allowed by this plan), these lands will only be considered suitable for development in a phased manner as set out in Table 6.2 below.

Table 6.2

Location	Zoning	Area (ha)	Jobs	Phase
Various	E1	110	1,000	1
Various	E1	85	8,500	1
Killinskyduff	E2	76	7,600	2
Tinahask	E2	56	5,600	2

Phasing

The development of employment-zoned lands shall be permitted on a phased basis as set out in Table 6.2. If developed to their full capacity, the lands in Phase 1 would meet all of the employment needs up to 2017 i.e. the duration of the plan. Phase 2 lands therefore will only be considered for business / office park type development pre-2017 if:

- Phase 1 lands don't deliver the quantum of jobs as envisaged in Table 6.2;
- Some barrier impedes the development of Phase 1 lands, that does not affect Phase 2 lands;
- Phase 1 lands are not released to the market during the plan period.

In this regard, Phase 2 lands will be considered for development **in 2014** if it can be shown that Phase 1 lands will not be able to deliver the number of new jobs required to meet the population goal for the plan period with regard to the three reasons set out above.

Submissions Received

No.	Name	Issues raised
4	NRA	The NRA notes that the proposed zoning objectives to the north and south of Arklow adjoining the N11 have been retained and it re-iterates that particular care needs to be exercised in relation to the development of these lands and recommends the need to undertake Strategic Transport Assessment in accordance with the recommendations of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.
5	NTA	1. The NTA recommends that lands designated as E1 and E2 should be amended to ensure that employment intensive development is not located on these lands. 2. It is recommended that where 'business park' type uses are allowed on E1 and E2 zoned lands, such development should be accompanied by the implementation of sustainable transport measures.
6	EPA	It is suggested that there should be amendment to Section 6.6 as follows: From: Where permission is sought for a strategic, large scale development of this nature during the lifetime of the plan, it will be facilitated To: Where permission is sought for a strategic, large scale development of this nature during the lifetime of the plan, it will be facilitated subject to the ability to provide adequate and appropriate infrastructure to service such developments.

Managers Opinion

1. The submission from the NRA has been noted, however the zoning at the northern and southern extremities of the plan area is completely consistent with maintaining the strategic capacity of the N11/M11. As stated in the Managers Report (November 2010) a Strategic Transport Assessment has not been carried out (as it was not a requirement at the time of drafting of the plan). The entire basis of the employment zoning of this plan is to redress the employment deficit of Arklow and its hinterland and to try and reverse the unsustainable commuting patterns northwards of Arklow. Reducing commuting will in fact increase strategic capacity of Route N11/M11.
2. In relation to the National Transport Authority's request that the uses allowable in the E1 and E2 zones be amended to ensure that 'employment intensive' uses are not permitted, the uses allowable in these zones is not the subject of this amendment and therefore this issue cannot be considered at this stage.
3. The draft plan from the outset has allowed for the development of 'business park' type use on E1 and E2 lands. The proposed amendment adds a phasing provision whereby the E2 lands can only be developed as business parks, rather than 'single undivided employment units' in Phase 2. The proposed amendment does not address the issue of 'sustainable transport' to these lands.

However, the provisions of Chapter 5 of the plan, in particular objectives PT5, CW1 and Section 5.8 require that sustainable transport measures to be incorporated into such large scale developments, so the NTA's requirements are already addressed in any case.

4. Objectives W1 – W9 set out in Chapter 8 of the plan address this concern and there is no need therefore to modify this amendment.

Manager's Recommendation

Adopt the amendment as proposed.

Amendment 5

Chapter 8

Service Infrastructure – Water, Waste & Energy

Amend Section 8.4.1 Water Objectives as follows:

- W3** Proposed developments within the plan area will only be permitted where it can be adequately demonstrated that sufficient waste water treatment infrastructure with adequate capacity is available or proposed to be available, capable of servicing the proposed development without causing any adverse **impacts on human health and water quality or other** environmental impacts.

Amend Section 8.12.2 Energy Objectives as follows:

- E3** To facilitate the development of off-shore wind energy projects insofar as onshore facilities may be required, **having regard to the provisions of the National Offshore Renewable Energy Development Plan.**

Submission Received

No.	Name	Issues raised
6	EPA	<ol style="list-style-type: none"> 1. The inclusion of the amended text in Amendment 5 (Objective W3) is welcomed. 2. It is suggested that the objective E3 should be amended to include a commitment to incorporate the recommendation of the OREDP upon adoption of the plan.

Managers Opinion

It is considered that the amendment to objective E3 is sufficient as the National Offshore Renewable Energy Development Plan (OREDPP) is currently at draft stage and it is considered sufficient that there will be regard to the document in facilitating offshore wind energy projects. It would be premature to state that there would be a commitment to incorporate the recommendations of the OREDP before the final document has been issued and its contents are unknown.

Manager's Recommendation

Adopt the amendment as proposed.

Amendment 6 (a), 6 (b) & 6 (c)**Chapter 11
Land Use Zoning****6 (a) Amend Table 11.2 as follows****From:**

Use	RE	R1	TC	NS	E1	E2	CE	WZ	T	AG	AOS	AM	EX
Industry (Light)	X	X	N	X	P	P	X	X	X	X	X	X	P

To:

Use	RE	R1	TC	NS	E1	E2	CE	WZ	T	AG	AOS	AM	EX
Industry (Light)	X	X	N	X	P	P	X	P	X	X	X	X	P

6 (b) Amend Table 11.2 as follows**Add in additional row “Waste Transfer Station” under the row “Recycling Centre”.****From:**

Use	RE	R1	TC	NS	E1	E2	CE	WZ	T	AG	AOS	AM	EX
Recycling Centre	X	X	N	N	P	X	P	X	X	X	X	X	P

To:

Use	RE	R1	TC	NS	E1	E2	CE	WZ	T	AG	AOS	AM	EX
Recycling Centre	X	X	N	N	P	X	P	X	X	X	X	X	P
Use	RE	R1	TC	NS	E1	E2	CE	WZ	T	AG	AOS	AM	EX
Waste Transfer Station	X	X	X	X	P	X	X	X	X	X	X	X	P

6 (c) Insert the following three definitions in Section 11.3

- (i) Recycling Centre: Use of a building or part thereof where the process by which materials otherwise destined for disposal are collected, reprocessed, or remanufactured, and are reused.
- (ii) Waste Transfer Station: Use of a building or part thereof where waste materials are taken from smaller collection vehicles and placed in larger vehicles for transport, including truck trailers and compaction trailers. Recycling and some processing may also take place at transfer stations.
- (iii) Wholesale outlet: Use of a building or part thereof or land used for the sale of goods by wholesale to traders only. Processing and manufacturing of such goods is excluded.

Submission Received

No.	Name	Issue raised
13	Arklow & District Chamber	It is requested no employment generating uses in the WZ be precluded in the plan.

Managers Opinion

Objectives AHMP2 and AHMP4 as set out below clearly support the future development of the port area for both leisure / recreational and marine / shipping uses.

AHMP2 To promote and facilitate through appropriate transport planning and land-use zoning the expansion or development of recreational facilities and marinas at the harbour in Arklow.

AHMP4 To support and facilitate the development of marine and shipping activity in Arklow, particularly the recreational use of the existing harbour/marina and the development of a roll on-roll off port at the existing Roadstone jetty.

In addition, Proposed Amendment 6(a) in fact would allow for additional uses (i.e. light industrial usage) in the WZ zone.

It is however considered appropriate to preclude the development of a waste transfer station in the WZ area, notwithstanding the potential employment generation, due to the impacts on visual and residential amenity that can arise from such activity (particularly use of external areas). There is significant quantum of land proposed to be zoned E1 in the draft plan that would be suitable for such use.

Manager's Recommendation

Adopt the amendment as proposed.

3.2 SUBMISSIONS / ISSUES RAISED NOT RELATED TO PROPOSED AMENDMENTS

No.	Name	Issues raised
1	DoEHLG	<ol style="list-style-type: none"> 1. It is suggested that the residential density on R1 zone lands should be increased from 20/ha to 30-35/ha in accordance with the "Sustainable Residential Development in Urban Area" Guidelines (2009). 2. As the development of an international airport in Arklow is not an objectives of the RPGs, this objective be excluded from the plan.
2	GDA	As the development of an international airport in Arklow is not an objectives of the RPGs, this objective be excluded from the plan.
4	NRA	The plan should make reference to official policy concerning national roads as provided for in " <i>Spatial Planning and National Roads</i> " (Draft) Guidelines for Planning Authorities.
5	NTA	<ol style="list-style-type: none"> 1. Car parking in the plan should be consistent with the NTA's draft 'Transport Strategy' 2. The NTA is not supportive of the provision of a third interchange at Lamberton. 3. The NTA does not consider Arklow an appropriate location for an international airport.
11	OPW	The OPW would like to see more detail in the Flood Risk Assessment.
12	Arklow Waste Disposal	The zoning of the waterfront area, in particular the former Qualceram site, should be changed from WZ to E1.
13	Arklow & District Chamber	The zoning of the waterfront area should be changed from WZ to E.

The Development Act 2000(as amended) under section 12(7,bii) specifically states that only submissions with respect to the proposed amendments can be made. Any other submissions/issues cannot therefore be considered.