

Section 3

Addendum II

TO THE
**SEA ENVIRONMENTAL REPORT & APPROPRIATE ASSESSMENT
SCREENING REPORT**

OF THE
**DRAFT ARKLOW TOWN & ENVIRONS DEVELOPMENT PLAN
2011-2017**

**ENVIRONMENTAL CONSEQUENCES OF
PROPOSED AMENDMENTS**

&

**UPDATES TO THE SEA ENVIRONMENTAL REPORT & APPROPRIATE
ASSESSMENT SCREENING REPORT ARISING FROM SUBMISSIONS
MADE DURING THE 1ST PERIOD OF PUBLIC DISPLAY
(AS COMMENTED ON IN ADDENDUM I)**

DECEMBER 2010

Table of Contents

1.	Introduction	2
1.1	Terms of Reference	2
1.2	Process for Making a new Development Plan for Arklow Town	2
2.	Environmental Consequences of Proposed Amendments	3
2.1	Summary and Key Issues	3
2.2	Amendment 1 Core Strategy	4
2.3	Amendment 2 Settlement and Housing Strategy	9
2.4	Amendment 3 Transport	16
2.5	Amendment 4 Economic Development, including Retail & Tourism	17
2.6	Amendment 5 Service Infrastructure-Water, Waste & Energy	20
2.7	Amendment 6 Land Use Zoning	21
3.	Updating of the SEA Environmental Report and Draft AA Arising from submissions	23

1 Introduction

1.1 Terms of Reference

This is the second addendum to the Strategic Environmental Assessment (SEA) Environmental Report and the Appropriate Assessment (AA) Screening Report of the Draft Arklow Town Development Plan 2011-2017.

Section 2 of this document identifies, with regard to the Environmental Report and AA Screening Report, the consequences of the implementation of the Proposed Amendments to the Draft Plan to the environment generally (as required by the Strategic Environmental Assessment process) and to the Natura 2000 network (as required by the Appropriate Assessment process).

Section 3 identifies updates which require to be made to the final Environmental Report and AA screening report which have arisen from the consideration of submissions made during the public display of the Draft plan and associated ER and AA Screening Report.

It should be noted that changes are not made to the original SEA Environmental Report or Draft AA at this stage; this Addendum forms part of the documentation of the ongoing SEA/AA/Plan-making process. It supplements and should be read in conjunction with the Environmental Report, the AA Screening Report and Addendum I¹. On adoption of the Plan the findings of this Addendum will be used to update the Environmental Report and AA Screening Report, as appropriate. These documents will also be amended to take account of any submissions on this Addendum and any modifications made to the Proposed Amendments by the Elected Members. The final SEA Environmental Report and AA Screening Report, together with an SEA Statement² will be made available to the public alongside the adopted Plan.

1.2 Process for making a new Development Plan for Arklow Town & Environs

The Proposed Amendments to the Draft Plan constitute a further stage in the process of making a new Development Plan for Arklow Town & Environs.

The Draft Plan and accompanying SEA Environmental Report and AA Screening Report were put on public display in August 2010. The Manager prepared a report on the submissions received during the display period and submitted it to the Elected Members for their consideration. Addendum I to the SEA Environmental Report and AA Screening Report was prepared at that stage.

Having considered the Draft Plan, the SEA Environmental Report, the AA Screening Report and the Manager's Report, the Members of Arklow Town and Wicklow County Councils, by resolution, resolved to amend the Draft Development Plan in accordance with the provisions set out in Section 12(6) of the Planning and Development Act as amended. The Proposed Amendments are required to be placed on public display for a period of not less than four weeks in accordance with Section 12(7) (b) of the Planning and Development Act as amended. Written submissions or observations with respect to the Proposed Amendments which are received will be taken into consideration by the Members of the Councils before the making of actual amendments to the Draft Plan.

¹ Addendum I details responses to the submissions on the SEA Environmental Report and AA Screening Report which were made during the first period of public display of the Draft Plan, SEA Environmental Report and AA Screening Report (and was included in the Manager's Report on submissions and observations). It proposes updates to the SEA Environmental Report and AA Screening Report as a result of these submissions, as appropriate.

² The SEA Statement will detail, inter alia, how environmental considerations have been integrated into the Plan.

2 Environmental Consequences of Proposed Amendments

2.1 Summary and Key Issues

A number of Proposed Amendments would be likely to improve the protection of the environment while a number would potentially conflict with this protection. Potential conflicts would be mitigated through adherence to the provisions of the Development Plan including those which have been integrated through the SEA/Plan-preparation process.

Note:

The text in black is the text as contained in the Draft Plan and is not changing.

Proposed amendments involving additional text are shown in red

Proposed amendments involving deletion of text are shown in ~~blue~~

Content of the Draft Plan which does not comprise policies or objectives is not within the scope of the SEA and therefore was not evaluated in the initial SEA Environmental Report or AA Screening Report. Consequently proposed amendments to such content are generally not considered by this Addendum. Where supporting text, referred to in policies is being amended and where such amendments would change the evaluation provided in the SEA Environmental Report and AA Screening Report, then such amendments are considered.

Responses to the Proposed Amendments with regard to the SEA and AA are shown in green text.

Proposed Amendment No. 1

Chapter 2: Core Strategy

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

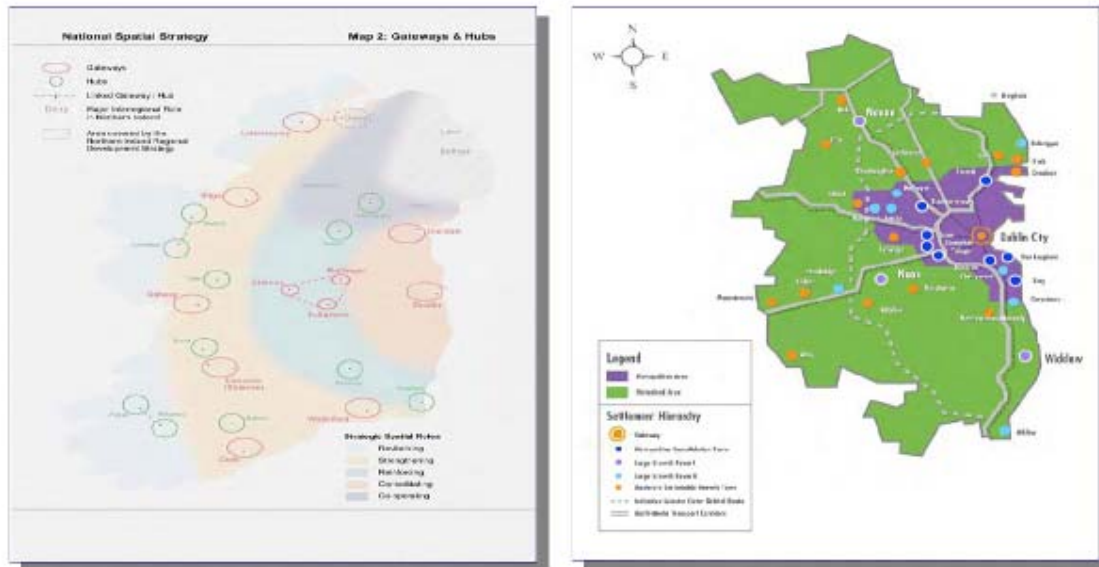
The settlement objectives for County Wicklow and for Arklow flow directly from the National Spatial Strategy and the Regional Planning Guidelines for the Greater Dublin Area as described in Chapter 1 of this plan.

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

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 Plan³. Therefore this plan must ensure a framework for the delivery of c. 2,965 residential units up to 2020;~~
- ~~▪ 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;~~
- 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;

³ 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.

⁴ '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

- 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;

- 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.

The proposed amendments set out above to Chapter 2 essentially comprise:

- a. Clarifying the adherence of the plan strategy to the NSS and the RPGs (Section 2.3.1);**
- b. Simplification of the presentation of the housing growth requirement figures (Section 2.3.3). It should be noted that no overall change is provided for the total growth in the number of households required up to 2020 which remains c. 4,000.**

Strategic Environmental Assessment

This proposed amendments would not therefore change the assessment provided in the ER of the Draft Plan

Appropriate Assessment

This proposed amendments would not therefore change the assessment provided in the AA Screening Report of the Draft Plan

Proposed Amendment No. 2

Chapter 3: Settlement and Housing Strategy

3.1 Introduction

This development plan shall have a 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 plan⁵.

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).

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

⁵ 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".

~~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~~.

~~2.1.1.1 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 plan⁶. 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 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.

⁶ This is at the lower end of the range for headroom suggested in the (draft) RPG'S 2010-2022.

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 Ballyraire. **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:

3— 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.

The proposed amendments set out above to Chapter 3 essentially comprise:

- a. Clarifying the population target for the settlement (Section 3.1);
- b. Simplification of the presentation of the housing growth requirement figures (Section 3.2). It should be noted that no overall change is provided for the total growth in the number of households required up to 2020 which remains c. 4,000;
- c. A reduction of the number of units likely to be developed in the Waterfront Zone (Section 3.3.1) from 1,000 to 800;
- d. Clarification of the amount of undeveloped R1 zoned lands available for housing development;
- e. The provision of the phasing programme for the delivery of the identified 4,000 new housing units (Table 3.4 and Section 3.3.3);
- f. The additional of a new objective underpinning the proposed phasing programme.

The only change of relevance to the Environmental Assessment is the provision of a phasing requirement.

Strategic Environmental Assessment

The phasing of residential developments would not be likely to result in adverse impacts on the environment with regard to the SEO's used in the Strategic Environmental Assessment.

Code	SEO
B1 Biodiversity	To ensure compliance with the Habitats Directive and National Biodiversity Plan with regard to protected species and habitats both within and outside of designated sites in accordance with the provisions of Articles 6 and 10 of the Habitats Directive.
B2	To avoid significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats, geological features, species or their sustaining resources in designated ecological sites such as Arklow Marsh, Arklow Rock Askintinny and Arklow Sand Dunnes, by development within or adjacent to these sites
B3	To ensure compliance with Article 10 of the Habitats Directive with regard to the management of features of the landscape – by sustaining, enhancing or - where relevant - preventing the loss of ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity
HH1 Human Health	To protect human health from hazards or nuisances arising from exposure to incompatible land uses in particular from the re-use of brown field lands in areas where previous uses may have contaminated lands such as the Water front Development Zone in Arklow.
R1 Re-use/Regeneration	Maximise the sustainable re-use of brownfield lands, and maximise the use of the existing built environment rather than developing greenfield lands
W-S Water Surface	To maintain and improve, where possible, the quality of Rivers, Lakes and other surface waters
W-G Water Ground	To prevent pollution and contamination of ground water
W-F Water Flooding	To prevent development on lands which pose - or are likely to pose in the future - a significant flood risk
AQ1 Air Quality 1	To reduce travel related greenhouse emissions to air
AQ2 Air Quality 2	To reduce car dependency within the plan area by way of, inter alia, encouraging modal change from car to more sustainable forms of public transport and encouraging development which will not be dependent on private transport
WW Waste Water	To serve new development with appropriate waste water treatment
DW Drinking Water	To serve development within the Plan area with drinking water that is both wholesome and clean
AH1 Archaeological Heritage	To protect the archaeological heritage of Arklow including entries to the Record of Monuments and Places – including the towns Zone of Archaeological Potential - and the context of the above within the surrounding landscape where relevant
AH2 Architectural Heritage	To preserve and protect the special interest and character of Arklow's architectural heritage including entries to the Record of Protected Structures, and their context within the surrounding landscape where relevant
L1	To protect and avoid significant adverse impacts on the landscape of Arklow, including landscape features such as the coastal region, Arklow Sand Dunes and designated views and prospects within the plan area.

	Likely to Improve status of SEOs	Probable Conflict with status of SEOs- unlikely to be mitigated	Potential Conflict with status of SEOs likely to be mitigated	No Likely interaction with status of SEOs
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.	B1 B2 B3 HH1 R1 AQ1 AQ2 L1		B1 B2 B3 HH1 W-S W-G W-F WW DW AH1 AH2 AQ1 AQ2	

H5- The provision of new developments on a phased basis has the potential to improve the regeneration/re-use of town centres and is likely to improve the status of SEO's relating to biodiversity by restricting direct impacts on such areas however the provision of lands in itself for development may during excavations/construction also impact on the status of biodiversity within the plan area through the break up of ecological networks etc. The appropriate zoning of lands in close proximity to existing amenities is likely to improve air quality through reduced emissions and thus human health, potential conflicts occur during the construction phase of such development with increased dust levels, noise etc. In phasing lands closest to the town centre the impacts on water quality can be reduced through the provision of appropriate infrastructure capable of facilitating such development although potential conflicts do occur if such development was to take place in the absence of such infrastructure. Recognition of sites of Archaeology and protected structures through appropriate zoning helps to facilitate preservation although the zoning of lands in close proximity to such sites or structures may have potential impacts.

Appropriate Assessment

The proposed changes that make up Proposed Amendment No. 2 will have no impacts on Natura 2000 sites and therefore would not change the assessment set out in the AA Screening Report.

Proposed Amendment No. 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.

This Proposed Amendment brings the objective with regard to a new means of access onto a national road in line with national policy as expressed in the NRA policy statement.

Strategic Environmental Assessment

The Strategic Environmental Assessment process is concerned solely with the evaluation of the strategies, policies and objectives of the Plan, rather than the development control standards. Therefore this change does not alter the assessment as set out in the Environmental Report.

Appropriate Assessment

The proposed change set out in Proposed Amendment No. 3 will have no impact on Natura 2000 sites and therefore would not change the assessment set out in the AA Screening Report.

Proposed Amendment No. 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 an 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 of 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.

This Proposed Amendment essentially provides:

- a. Additional explanation for the rationale for the employment zonings contained in the draft plan but does not alter the overall number of jobs which the draft plan aims to provide for through the appropriate zoning of land;
- b. For a phasing programme for the delivery of zoned employment land.

Strategic Environmental Assessment

The phasing of employment development would not be likely to result in adverse impacts on the environment with regard to the SEO's used in the Strategic Environmental Assessment.

Appropriate Assessment

The proposed change set out in Proposed Amendment No. 4 will have no impact on Natura 2000 sites and therefore would not change the assessment set out in the AA Screening Report.

Proposed Amendment No. 5

Chapter 8 Service Infrastructure – Water, Waste & Energy

Objective 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’.

This Proposed Amendment simply emphasises that the environmental impacts of most concern when it comes to dealing with wastewater are those impacts on water quality and human health.

Strategic Environmental Assessment

The proposed amendment would not alter the assessment of this objective as set out in Section 8.2.7 of the Environmental Report

Appropriate Assessment

The proposed change set out in Proposed Amendment No. 5 is likely to have positive impacts on Natura 2000 sites surrounding the plan area through emphasising the importance of impacts of water quality. It would therefore change the analysis set out in the AA Screening Report that full Appropriate Assessment is not required.

Chapter 8 Service Infrastructure – Water, Waste & Energy

Objective 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**

In order to future proof this plan, it is considered appropriate to make reference to the National Offshore Renewable Energy Development Plan although it is only currently at draft stage. Given the uncertainty however what this plan will contain, it is not possible to fully evaluate the impacts of the implementation of this proposed amended objective. However, this plan is also undergoing Strategic Environmental Assessment / Appropriate Assessment and therefore adverse impacts on the environment or the Natura 2000 network are either unlikely or will be mitigated.

Proposed Amendment No. 6

Chapter 11: Land Use Zoning

Proposed Amendment 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

Strategic Environmental Assessment

The Strategic Environmental Assessment process is concerned solely with the evaluation of the strategies, policies and objectives of the Plan, rather than the development control standards. Therefore this change does not alter the assessment as set out in the Environmental Report.

Appropriate Assessment

The proposed change set out in Proposed Amendment No. 6 (a) will have no impact on Natura 2000 sites and therefore would not change the assessment set out in the AA Screening Report.

Proposed Amendment 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

Waste Transfer Station	X	X	X	X	P	X	X	X	X	X	X	X	P
-------------------------------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------	----------

Strategic Environmental Assessment

The Strategic Environmental Assessment process is concerned solely with the evaluation of the strategies, policies and objectives of the Plan, rather than the development control standards. Therefore this change does not alter the assessment as set out in the Environmental Report.

Appropriate Assessment

The proposed change set out in Proposed Amendment No. 6 (b) will have no impact on Natura 2000 sites and therefore would not change the assessment set out in the AA Screening Report.

Proposed Amendment 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.

Strategic Environmental Assessment

The proposed amendment would not alter the assessment of the Environmental Report

Appropriate Assessment

The proposed amendment would not alter the assessment of the AA Screening Report

3. Updating of the SEA Environmental Report and AA Screening Report Arising from Submissions

The following section identifies updates to the SEA Environmental Report (ER) and AA Screening Report which have arisen from submissions which were made on the Draft Plan, SEA Environmental Report and AA Screening Report while they were on public display.

Section 1 General

- A) To include the following sentence at the end of the 1st paragraph in Section 7.3 of the Environmental Report Strategic Environmental Objectives:**

The interactions between the SEOs and the alternatives determine the likely significant effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

- B) To update Section 8.1 of the Environmental Report Strategic Environmental Objectives:**

This section evaluates the Draft Plan provisions. Strategic Environmental Objectives (SEOs) are used for this purpose as outlined under Section 7.3. Use has also been made of the environmental baseline descriptions and the maps of the individual environmental components and the overlay of environmental sensitivities provided in Section 3.

The interactions between the SEOs and the provisions of the Plan determine the likely significant effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

- C) Update all reference in the Environmental Report to the now "Adopted Regional Planning Guidelines (GDA RPG;2010-2016).**

Section 2 Specific comments on the Non Technical Summary (NTS)

- D) Include new sub-section in the Non-Technical Survey relating to "how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the information", as required in Schedule 2B (h) of S.I. No. 436 of 2004.**

- E) To update Section 3.3.2 of the Environmental Report Baseline Environment Description to include the following:**

Included in the List of Figures (in the Table of Contents) is Figure 3.2 *Corine Land Cover Mapping 2000*; however reference is made in Section 3.3.2 to Corine 2006 Land Classification. This should be updated as appropriate; where time permits this database should be consulted.

- F) To Update Section 3.6.2 of the Environmental Report Risk Assessment as follows:**

The footnote (no.11) relating to the Avoca Estuary should be updated to refer to "...**benthic**..." rather than "...*bottom of the sea*..."

- G) To update Section 3.6.12 of the Environmental Report 'Future Influences of flood risk' as follows:**

The footnote (no.11) relating to "OSPAR Nutrients should be updated to refer to "...**benthic**..." rather than "...*bottom of the sea*..."

H) Under 'Existing Problems' in Section 3.6.8 *Register of Protected Areas* highlights water bodies in the plan area as being (1b) rather than (1a). This should be amended to refer to the correct classification (1a) representing *water bodies at significant risk of not achieving good status by 2015*.

I) To update Section 7.3 of the Environmental Report 'Strategic Environmental Objectives' and add the following sentence:

The interactions between the SEOs and the alternatives determine the likely significant effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

J) To update Section 8.1 of the Environmental Report 'Summary of Evaluation Of Draft Plan Objectives' by adding the following text:

This section evaluates the Draft Plan provisions. Strategic Environmental Objectives (SEOs) are used for this purpose as outlined under Section 7.3. Use has also been made of the environmental baseline descriptions and the maps of the individual environmental components and the overlay of environmental sensitivities provided in Section 3.

The interactions between the SEOs and the provisions of the Plan determine the likely significant effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects

K) To update Section 10.5 of the Environment Report 'Reporting' to include the following sentence:

Indicators, targets and corrective and remedial actions will be reviewed during the preparation of the preliminary monitoring evaluation report.