

**LIST OF PERSONS OR BODIES WHO MADE SUBMISSIONS/OBSERVATIONS FOR THE  
PROPOSED AMENDMENTS TO THE DRAFT ARKLOW TOWN AND ENVIRONS  
DEVELOPMENT PLAN (FEBRUARY 2011)**

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

1

**Leonora Earls**

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**From:** Margaret Killeen [Margaret.Killeen@environ.ie]

**Sent:** 15 February 2011 15:21

**To:** Planning - Planning and Development Secretariat

**Subject:** Comments on Amendments to the Draft Arklow Town and Environs DP

Attached please find comments from the Minister for the Environment, Heritage and Local Government on the above proposal. Hard copy to follow.

Please confirm that you received this.

Thanking you,

Margaret Killeen  
margaret\_killeen@environ.ie  
Ph: 01-8882418



15/02/2011

15 February, 2011.

Mr. Des O'Brien  
Director of Services  
Planning and Development  
Wicklow County Council  
Whitegates  
Wicklow Town  
Wicklow.

**Re: Amendments to the Draft Arklow Town and Environs Development Plan  
2011-2017**

Dear Mr. O'Brien,

I am directed by the Minister for the Environment, Heritage and Local Government to refer to your recent request for submissions in respect of the above Development Plan and set out hereunder observations for consideration by the Council.

***Core Strategy***

Neither the Draft Development Plan or the proposed amendments include a map as required in terms of section 10(2B) of the Planning and Development Acts. Furthermore, no table is provided along the lines set out in Appendix 2 of the Department's *'Guidance Note on Core Strategies'* dated November 2011.

***Transport***

In section 5.8.3 reference is made to NRA *'Policy Statement on Development Management and Access to National Roads'* (May 2006). It would be more appropriate if the reference were to the *'Draft Spatial Planning and National Roads'* Guidelines issued in June 2010, or to any subsequent versions of these Guidelines.

***Phasing***

Section 3.3.3 deals with phasing of residential development. It sets out three conditions under which Phase 2 lands would be required for development. It is

suggested that an additional condition be added, namely, that if 75% or more of the Phase 1 lands are developed.

### ***Residential Density***

It is noted that in the draft DP the R1 zoned residential land would be developed at a density of about 20 dwellings per hectare. The '*Sustainable Residential Development in Urban Areas*' Guidelines (May 2009) indicate that in outer suburban/greenfields areas residential development should take place in the range 30-35 dwellings per hectare (net) and that net densities of less than 30 dwellings per hectare should be discouraged.

It is suggested that the Planning Authority give consideration to increasing the R1 density provision in order to be in line with the Ministerial Guidelines.

### ***Airport***

Objective AHMP3 of the draft DP states "*To promote Arklow as a location for a new international airport ...*" It should be pointed out that development of an international airport would be a major infrastructure project and that such a project in Arklow is not mentioned in the '*Regional Planning Guidelines for the Greater Dublin Area 2010-22*'. In view of the fact that DPs need to be consistent with RPGs it is suggested that the objective be amended to exclude reference to promoting Arklow as a location for a new international airport.

### ***SEA and AA***

The material amendments have been subject to screening and in all cases it was determined that no changes were needed to the screening SEA and AA reports produced at the draft DP stage, which concluded that there would be no significant impact on the environment or on Natural 2000 sites.

The Department remains available to provide advice to the Council on the foregoing, including as necessary on the Core Strategy provisions.

Yours sincerely,

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Patrick O'Sullivan,  
Planning System and Spatial Policy.

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## Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022



1st February, 2011

Town Clerk,  
Arklow Town Council,  
Avoca River House,  
North Quay,  
Arklow,  
Co. Wicklow.



RE: Submission on the amendments of the Draft Arklow Town and Environs  
Development Plan 2011-2017

Dear Sir/Madam,

On behalf of the Dublin and Mid-East Regional Authorities, I attached herewith for your information the submission of the joint members, which was agreed at their meeting on Thursday 27<sup>th</sup> January, 2011, on the amendments to the Draft Arklow Town and Environs Development Plan 2011-2017.

Yours sincerely,

Patricia Potter,  
Director  
Dublin Regional Authority

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Regional Planning Guidelines Office, Mainscourt, 23 Main Street, Swords, Co. Dublin.  
Ph: 01-8074482 F: 01-8901355 E: info@rpg.ie

## Regional Planning Guidelines for the Greater Dublin Area 2010 - 2022

### SUBMISSION OF THE JOINT MEMBERS OF THE DUBLIN AND MID-EAST REGIONAL AUTHORITIES ON THE AMENDMENTS OF THE DRAFT ARKLOW TOWN & ENVIRONS DEVELOPMENT PLAN 2011-17

(in accordance with S.27 of the Planning and Development Act, as amended).

#### Introduction

The Regional Planning Guidelines (RPGs) 2010-2022 aim to direct the future growth of the Greater Dublin Area up to 2022 by implementing the strategic planning framework set out in the National Spatial Strategy (NSS) and by supporting the forthcoming National Transport Authority Strategy. The population and housing policy of the NSS are translated through the Regional Planning Guidelines to the Council level, with updated population targets for the GDA and gateway prescribed by the Department of the Environment Heritage and Local Government. In this regard the RPG population allocations inform the core strategies and housing strategies of Development Plans within the GDA. The RPGs also provide a framework for, and policy guidance to, local authorities in the areas of economic development, infrastructure, rural development, flood risk, heritage and the environment and social infrastructure.

#### RPG Population and Housing Targets for County Wicklow

	2006	2016	2022
Population Target	126,194	164,280	176,800
Housing Allocation	49,088	68,351	82,012

Table 7 of the Regional Planning Guidelines also sets out metropolitan population and housing distribution targets for the County Wicklow up to 2016, with a population allocation of 56,213 (existing and proposed) and housing allocation of 8,090 (42%)

#### Observations on the Amendments to the Draft Arklow Town Plan 2011-2017

Following a review of the amendment to the Draft Arklow Town and Environs Plan 2011-2017, the Regional Authorities make the following comments:

- The amendment of the core strategy to include reference to the National Spatial Strategy & Regional Planning Guidelines for the Greater Dublin Area is welcome and recognises the linkages between national, regional and local planning tiers.
- The settlement strategy, consequent of amendments within Chapter 3 of the Draft Arklow & Environs Plan, is considered to be aligned with the population targets established within the Wicklow County Development Plan for Arklow.
- It is recommended that a core strategy map should be considered for inclusion in a Town Plan for Arklow.
- It is noted that provision for an airport, as per the Draft Plan, is not an identified regional infrastructure project with the Regional Planning Guidelines.

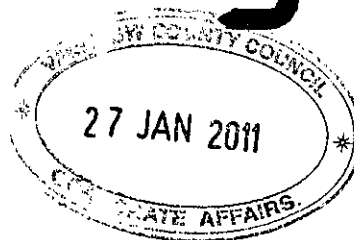
27<sup>th</sup> January, 2011

An Roinn Oideachais agus Scileanna  
Bóthar Phort Laoise  
An Tulach Mhór  
Uíbh Fhailí



Department of Education and Skills  
Portlaoise Road  
Tullamore  
Co. Offaly

Mr. Des O'Brien  
Director of Services  
Planning & Development  
Wicklow County Council  
Aras An Chontae  
Cill Mhantáin



26<sup>th</sup> January, 2011

**Re: Proposed Amendments to Draft Arklow Town & Environs Development Plan 2011-2017**

Dear Mr. O'Brien

I refer to your letter of 11<sup>th</sup> January 2011 regarding the above mentioned plan. The previous submission by the Department of Education & Skills in 2009 made recommendations for education provision based on a projected population for Arklow Town to 2016 as provided at that time. I note from the proposed amended plan that population projections are now provided to 2017 and therefore the changes to the education provision should be noted as follows:

**Information used to calculate educational infrastructural requirements**

At the outset, it might be useful to outline how the Department calculates the extent of primary and post primary provision needed in an area:

- 12% of the population at any given time is of primary school going age.
- 8.5% of the population at any given time is of post primary school going age.
- At primary level, school accommodation is calculated on the basis of a Pupil Teacher Ratio of 24.1 meaning each individual classroom in a school will have 24 pupils.
- New primary school buildings are generally provided in multiples of 8 classrooms. This is because there are eight individual class groupings between junior infants and 6th class. A 16 classroom school would mean that there are 2 junior infants' classes, 2 senior infant classes etc. with a 24 classroom school having 3 junior infant classes etc.
- A new school ranging in size from 4 - 8 classrooms requires 0.77 hectares (1.9 acres)
- A new school ranging in size from 8 - 16 classrooms requires 1.14 hectares (2.8 acres)
- A new school ranging in size from 16 - 24 classrooms requires 1.6 hectares (4 acres)
- A new school ranging in size from 24 - 32 classrooms requires 2.2 hectares (5.47 acres)
- At post primary level, the Department refers to the size of a building by the number of pupils it will cater for because the number of pupils, together with the curriculum to be delivered (which is school specific), will dictate the range and extent of specialist facilities to be provided.
- Generally, the Department will not build a post primary school with greater than 1,000 places.

- 4.86 hectares (12 acres) are required for a new post primary school.

It is noted that, as per the recently provided indicative population for Arklow by 2017 of 19,670 persons, this represents an increase of 7,958 persons on the 2006 Census of 11,712 persons. Using the Department's criteria this projected increase in population could yield a potential additional 955 primary pupils (or a requirement for circa 40 additional primary classrooms) and a potential additional 676 post-primary pupils (which would indicate the requirement for an additional post-primary school if existing schools cannot be extended to cater this increase). It should be noted that any extension of existing facilities would be dependent upon size and suitability of existing buildings and sites and upon school agreement.

In light of the above the Department recommends that it would be prudent to reserve 3.2 hectares for primary school provision and 4.86 hectares for post-primary provision.

Some other general points worth making at this stage are:

- The Department always requests site reservations to be made as close as possible to community facilities such as sports facilities, libraries etc. so that these can be shared between the school and the community.
- The Department is also open to the concept of multi-campus school arrangements e.g. 2/3 primaries side by side or a primary and a post primary school sharing a site.

Both of these approaches can have the affect of reducing the land take for school development.

#### Site Suitability

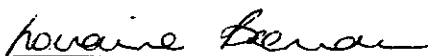
Please refer to our website [www.education.ie](http://www.education.ie) and Technical Guidance Document - 025 – Identification and Suitability of Sites for Primary School.

Your attention is also drawn to the Department of Environment, Heritage and Local Government guidelines titled "**Sustainable Residential Development in Urban Areas**" published in February 2008 which provides that no significant development should take place without an assessment on impact of school provision (refer to Chapter 4: Page 22). Please refer to Department of Environment, Heritage and Local Government website [www.environ.ie](http://www.environ.ie).

In addition the Department of Education & Science draws your attention to the Code of Practice for Planning Authorities and the provision of schools; in particular Item 2 and the need for consulting with this Department regarding the assessment of specific sites. Again this document is available on both the Department of Education & Science and Department of Environment, Heritage and Local Government websites.

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

Yours sincerely,



Lorraine Brennan,  
Executive Officer,  
Forward Planning Section.

Tel. No: 057-9324392

Email: [lorraine\\_brennan@education.gov.ie](mailto:lorraine_brennan@education.gov.ie)



Town Clerk  
Arklow Town Council  
Avoca River House  
North Quay  
Arklow  
Co. Wicklow

Teach Naomh Máirtín / Bóthar Waterloo / Baile Átha Cliath 4  
St. Martin's House / Waterloo Road / Dublin 4  
Teil: / Tel: + 353 1 660 2511 Facs: / Fax: + 353 1 668 0009

Dáta | Date 11 February, 2011

Ár dTag. | Our Ref.

NRA11-81250

Bhur dTag. | Your Ref.

**Re: Draft Arklow Town and Environs Development Plan, 2011 – 2017;  
Proposed Amendments**

Dear Sir/Madam,

The Authority welcomes referral of the proposed amendments to the Draft Arklow Town and Environs Development Plan, 2011 – 2017.

The Authority acknowledges the consideration of the NRA observations submitted in relation to the Draft Plan and welcomes the proposed amendments that have resulted on foot of that submission.

The Authority is greatly concerned that the opportunity to review the Draft Plan in the context of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities was not availed of. The Authority is further concerned that the proposed amendments make no reference to adherence to official policy concerning national roads as provided for in the DoEHLG Spatial Planning and National Roads (Draft) Guidelines, however the Authority notes with concern the Managers Response to the DoEHLG and the NRA submissions on the Draft Plan in this regard.

In relation to other specific proposed amendments on display, the Authority provides the following observations;

**Proposed Amendment No. 3;**

With reference to the proposed amendment to the text of section 5.8.3 concerning access to national roads, the Authority welcomes clarification in relation to cases that involve the improvement of existing accesses to national roads which provides that no intensification of use of the access is implied by any consent to improve same.

While the Authority notes that the proposed amendment also includes additional cases where access to national roads may be considered, the Authority would highlight, in relation to cases brought forward on the basis of section 3.2.6 of the NRA Policy Statement on Development Management and Access to National Roads, that section 3.2.6 of the Policy Statement only relates to plan led exceptional circumstances. Section 3.2.6 of the Policy Statement does not relate to exceptions brought forward on a case by case basis, generally through development management applications, therefore, the Council may wish to review this aspect of the proposed amendment.

The Authority would also highlight that the approach promoted in section 3.2.6 of the Policy Statement is consistent with the provisions of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities (2010) which indicates that any exceptions to the control of development accessing national roads should be brought forward in a plan led approach in

consultation with the NRA when relevant development plans or local area plans are being prepared, section 2.5 of the Guidelines refer.

**Proposed Amendment No. 4;**

It is noted that the Council have retained the proposed zoning objectives to the north and south of Arklow adjoining the M11 and associated junctions. The Authority has previously highlighted that particular care needs to be exercised in relation to the development of the subject lands and recommended the need to undertake Strategic Transport Assessment in accordance with the recommendations of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities. This remains the Authority's position.

The Authority requests that the foregoing observations are taken into consideration in the adoption of the Arklow Town and Environs Development Plan, 2011 - 2017.

Yours sincerely,



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Michael McCormack  
Policy Adviser (Planning)

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**Leonora Earls**

**From:** Owen Shinkwin [owen@nationaltransport.ie]  
**Sent:** 15 February 2011 14:32  
**To:** Arklow Development Plan  
**Subject:** NTA submission on the Arklow Draft Development Plan (proposed amendments)

Dear Sir/Madam,

Please find attached the National Transport Authority's submission on the Arklow Draft Development Plan - Proposed Amendments.

Yours sincerely,

Owen Shinkwin

*Owen Shinkwin*

**National Transport Authority**

Dún Scéine  
Harcourt Lane  
Dublin 2

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Ddi: + 353 (0)1 879 8314

Email: [owen.shinkwin@nationaltransport.ie](mailto:owen.shinkwin@nationaltransport.ie)  
Web: <http://www.nationaltransport.ie>



Town Clerk,  
Arklow Town Council,  
Avoca River House,  
North Quay,  
Arklow,  
Co Wicklow.

15<sup>th</sup> February 2011

Dear Sir/ Madam,

**Re: Proposed Amendments to the Arklow Town and Environs  
Development Plan 2011-2017**

The National Transport Authority (the Authority) submits the following report on the proposed amendments to the Arklow Town and Environs Development Plan 2011-2017. These comments focus on amendments within the following areas:

- Settlement and Housing Strategy
- Economic Development

Under each policy area, observations are presented in the following order:

- Comments
- Recommendations

In addition to these observations, which can be dealt with as part of the proposed amendments, a number of issues and concerns are reiterated that were previously raised by the Authority, but which are not addressed in the proposed amendments and which, accordingly, raise concerns in relation to their consistency with the draft Transport Strategy.

**Population and Housing**

***Proposed Amendment***

Chapter 3 amendments in relation to population targets (Table 3.1, 3.2), predicted housing need (Table 3.3), residential zoning (Table 3.4) and phasing (section 3.3.3).

### **Comments**

In its submission on the draft Arklow Development Plan 2011-2017, the National Transport Authority (hereafter referred to as the Authority) recommended that the development of residential zoned lands be prioritised in a manner which supports the sequential expansion of the town, focused on the town centre. The Authority welcomes the inclusion of a residential phasing scheme in Section 3.2.2 and Table 3.4 in the proposed amendments to the Draft Plan. In particular, the NTA welcomes the inclusion of the objective H5 (amendment) that ensures that *"lands closest to the centre or to existing transport and/or community infrastructure be developed prior to more outlying lands, unless in exceptional circumstances"*.

Section 3.3.3 includes new phasing conditions for the release of development lands. These state that Phase 2 lands 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"*

The NTA recommends that an additional condition be included in Section 3.3.3. to strengthen the implementation of Objective H5. This would effectively link the release the Phase 2 lands to the overall housing growth targets for County Wicklow. In the event of a downward revision of County level housing growth targets, the phase 2 lands would not be required for development.

The Regional Planning Guidelines for the Greater Dublin Area assigns significant housing and population growth within the region. This may be revised downward in the short term. In this event, it is likely that the number of new houses required in County Wicklow would be reduced and by association, this would impact on the amount of new houses required in Arklow.

Table 3.3 provides that the number of new residential units required by 2020 is 4,000. This projected level of housing development is high and exceeds the number of units required in Table 4.4C of the Wicklow County Development Plan. The draft NTA Transport Strategy is broadly based on the distribution of housing and population in the RPGs and the GDA County Development Plans. There is a risk to transport investment and development consolidation in the region if planned housing growth in Arklow significantly diverges from that planned for at county and regional level, particularly if regional housing targets in the GDA are revised downward.

### **Recommendation**

The Authority supports the inclusion of a residential phasing scheme and this should be retained in the adopted plan.

The Authority recommends that the phasing scheme be strengthened to reinforce the local authority objective of ensuring that lands closest to the centre or to existing transport and/or community infrastructure are developed prior to outlying lands.

The Authority therefore recommends that Section 3.3.3. be amended in order to strengthen the basis for Objective H5, by adding the following text:

*"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 4.4B of the Wicklow County Development Plan 2010-2016 and any amendment to these growth targets, following any revision RPG growth targets".*

## **Economic Development**

### ***Proposed Amendment***

Chapter 6 amendments in relation to availability of zoned lands (Section 6.6(i)) and employment phasing (Section 6.6(i), Table 6.2)

### ***Comments***

The Authority supports the development of Arklow as an employment centre for a range of employment types as this is consistent with Regional Planning Guidelines for the GDA and its role as a Large Growth Town II.

In its submission on the draft Arklow Development Plan 2011-2017, the NTA recommended that the zoning objectives E1 and E2 be amended to ensure that employment intensive development is not located on these lands. In general, for employment intensive uses, accessibility by public transport, cycling and walking and location within Arklow Town Centre should be the primary considerations. This criterion has not been referenced in the Draft Development Plan.

The amended Draft Plan introduces a phasing scheme for "business park" type development on the lands zoned E1 and E2. If trip intensive developments are to be located on these lands, the NTA supports the inclusion of an additional condition that provides that any future developments would be subject to the implementation of sustainable transport measures.

### ***Recommendation***

The Authority recommends that the following statement be added to the amended Section 6.6:

*"Any future development on the E1 and E2 zoned lands should be contingent on the concurrent provision of sustainable transport measures, which renders new employment sites accessible from within local walking and cycling catchments and serviceable by bus-based public transport".*

## Issues previously raised but not addressed in the proposed amendments

### Car Parking

To be consistent with the NTA's draft Transport Strategy, parking provision in all GDA development plans for new non-residential developments will need to reflect the maximum regional car parking standards set out in the Strategy (see Table 1 below).

**Table 1**

	Maximum Parking Standards (per floor area unless otherwise specified)	Threshold from which standard applies (gross floor space)
Employment, Including Offices	1 space per 50m <sup>2</sup>	1,500m <sup>2</sup>
Food Retail	1 space per 14m <sup>2</sup>	1,000m <sup>2</sup>
Non Food Retail	1 space per 20m <sup>2</sup>	1,000m <sup>2</sup>
Cinemas and Conference Facilities	1 space per 5 seats	1,000m <sup>2</sup>
Higher and Further Education	1 space per 2 staff + 1 space per 15 students	2,500m <sup>2</sup>
Stadia	1 space per 15 seats	1,500 seats

Source: Greater Dublin Area – Draft Transport Strategy 2011-2030

In addition, the level at which maximum standards are set is of great importance. Where they exist, maximum standards are usually applied with varying degrees of constraint, on the basis of defined locational factors such as centrality and public transport accessibility.

The Draft Development Plan does not currently reflect either the above recommended values or the approach to and application of maximum standards, proposed in the Authority's Draft Transport Strategy.

### Roads Objectives

The Authority notes the National Road Authority's position as represented in the Managers Report, that it would not be supportive of proposals for a third motorway junction at Lamberton. The Authority supports this position and reiterates that the proposed Lamberton interchange would facilitate the use of the N11/M11 Arklow Bypass by local traffic and as such would not be consistent with the strategic function of the N11/M11 as a national primary route.

### Airport Objective

The Authority reiterates its position that Arklow is not an appropriate location for an international airport in that it would be at some remove from any major centre of population and would require airport users to travel significantly longer distances,

compared to a location more proximate to the main concentrations of population within the Greater Dublin Area. Under these circumstances, the large majority of trips generated by such an airport are likely to be far more car dependent and as such, would be inconsistent with the objectives of Smarter Travel and the forthcoming Transport Strategy for the GDA.

## **Conclusion**

I trust that the Authority's recommendations pertaining to the proposed amendments will be addressed and would welcome the opportunity to discuss these, should you have any further questions relating to them. The Authority would also welcome the opportunity to further discuss the issues of outstanding concern, as outlined above.

Yours sincerely,



Hugh Creegan  
*Director of Transport Planning and Investment*



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Environmental Protection Agency  
An Ghníomhaireacht um Chaomhnú Comhshaoil

Regional Inspectorate, Inniscarra  
County Cork, Ireland

Cigireacht Réigiúnach, Inis Cara  
Contae Chorcaí, Éire

T: +353 21 487 5540  
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E: info@epa.ie  
W: www.epa.ie

LoCall: 1890 33 55 99

Mr Des O'Brien  
Director of Services  
Planning and Economic Development  
Wicklow County Council  
Aras an Chontae  
Cill Mhantain



11<sup>th</sup> February 2011

Our Ref: SCP091001

**Re. Proposed Amendments to the Draft Arklow Town And Environs  
Development Plan 2011-2017**

Dear Mr O'Brien,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 11/01/2011,  
regarding the above and notes its contents.

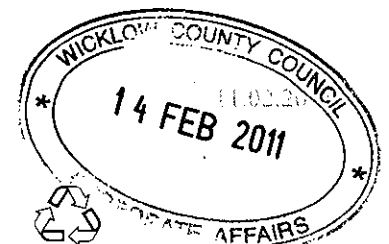
**SEA Determination**

Your position with regard to the need for Strategic Environmental Assessment (SEA) of the  
Proposed Amendments is noted.

**Specific Comments in relation to the Proposed Amendments**

- Consideration should be given to amending the proposed included text in Amendment 4 - Chapter 6 *Economic Development including Retail & Tourism* on page 15 as follows (suggested text in bold italic): *"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..."*
- The inclusion of the amended text in Amendment 5 (Objective W3) in relation to impacts on human health and water quality is welcomed.
- In the context of further strengthening Objective E3, consideration should be given to including a commitment to incorporate the recommendations the OREDP upon adoption of this Plan and as relevant to Wicklow County Council.
- The Agency acknowledges the inclusion of Section 3 of Addendum II to the SEA Environmental Report (ER) & Appropriate Assessment (AA) Screening Report detailing the updated to the ER and AA arising from submissions made during the 1<sup>st</sup> period of public display.

SCP091001 EPA Submission on Proposed Amendments  
to the Draft Arklow Town & Environs DP 2011-2017



### **Obligations with respect to National Plans and Policies and EU Environmental Legislation**

You are referred to your responsibilities and obligations in accordance with all national and EU environmental legislation. It is a matter for Wicklow County Council to ensure that, when undertaking and fulfilling their statutory responsibilities; they are at all times compliant with the requirements of national and EU environmental legislation.

### **SEA Statement**

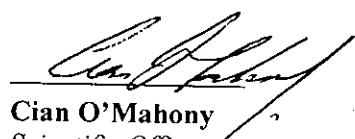
You are also referred to the requirement to prepare an SEA Statement outlining "Information on the Decision" as required by Article 13 of Planning and Development Regulations as amended by Article 7 of the SEA Regulations. This should summarise the following:

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

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

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

Yours sincerely,

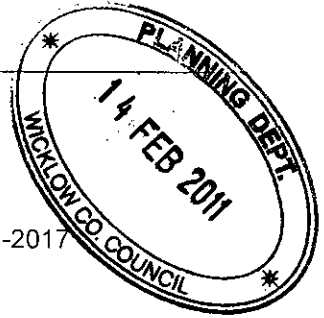


**Cian O'Mahony**  
*Scientific Officer*  
*Office of Environmental Assessment*  
*Environmental Protection Agency*  
*Regional Inspectorate*  
*Inniscarra, County Cork*

7

**Leonora Earls**

**From:** Carmel Conaty [Carmel.Conaty@dcenr.gov.ie]  
**Sent:** 14 February 2011 15:39  
**To:** Planning - Planning and Development Secretariat  
**Subject:** Proposed amendments to the Draft Arklow Town & Environs Dev Plan 2011-2017



Des O'Brien  
 Planning & Development  
 Wicklow County Council

Our Ref: 5771

**Proposed amendments to the Draft Arklow Town & Environs Dev Plan 2011-2017**

Dear Des,  
 With reference to your correspondence dated 11<sup>th</sup> January 2011 re above.

The Department of Communications, Energy & Natural Resources has no comments/observations to make at this time.  
 This is without prejudice to any comments/observations Inland Fisheries Ireland may have in this regard.

Kind Regards,

Carmel Conaty  
 Co-ordination Unit

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Deimhnítear leis seo freisin nár aimsíodh víreas sa phost seo tar éis a scanadh.



Roinn Cumarsáide, Fuinnimh agus Acmhainní Nádurtha  
Department of Communications, Energy and Natural Resources

29-31 Bóthar Adelaide  
Baile Átha Cliath 2

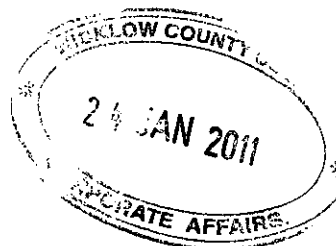
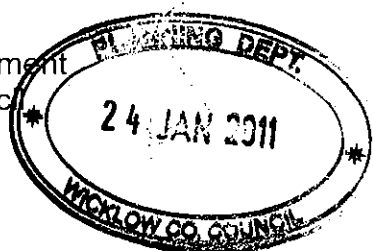
Oifig an Aire  
Office of the Minister

29-31 Adelaide Road  
Dublin 2

20 January 2011

~~Y-2011-11-00000~~

Mr O'Brien  
Director of Services  
Planning and Development  
Wicklow County Council  
Aras and Chontae  
Cill Mhantáin



Dear Mr O'Brien

On behalf of Mr Eamon Ryan T.D., Minister for Communications, Energy and Natural Resources I wish to acknowledge receipt of your recent letter regarding the proposed amendments to the draft Arklow Town and Environs Development Plan 2011-2017.

This correspondence will be brought to the Ministers attention.

Yours sincerely

Colm Ó Conaill  
Private Secretary to the  
Minister for Communications, Energy & Natural Resources



Office of the Minister for Agriculture, Fisheries and Food, Dublin 2.

Oifig an Aire Talmhaíochta, Iascaigh agus Bia, Baile Átha Cliath 2.

8

17 January 2011



Mr Des O'Brien  
Director of Services  
Planning & Development  
Wicklow Co Council  
Áras An Chontae  
Cill Mhantáin

PLEASE QUOTE REF NUMBER ON ALL CORRESPONDENCE.

Our Ref: 2011/38933N /JC HO

Dear Mr O'Brien

I wish to acknowledge receipt of your recent correspondence addressed to the Minister for Agriculture, Fisheries and Food, Brendan Smith, TD concerning Proposed amendments to the draft Arlow Town and Environs Development Plan 2011-2017.

I will bring your letter to the Minister's attention.

Yours sincerely,

  
PP Kevin Galigan  
Private Secretary





HEALTH AND SAFETY  
AUTHORITY

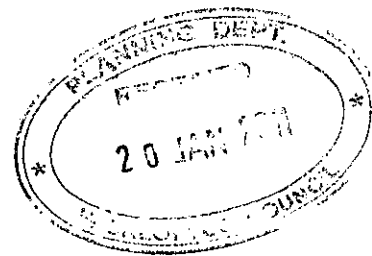
HSA Head Office, Metropolitan Building, James Joyce Street, Dublin 1  
Telephone: 1890 289 389 Website: <http://www.hsa.ie>



9

19/01/2011

Planning & Development Section,  
Wicklow County Council,  
County Hall  
Station Road  
Wicklow



**Re: Proposed Amendments to the Draft Arklow Town and Environs Development  
Plan 2011-2017**

A Chara,

I wish to acknowledge receipt of your correspondence dated 11/01/11, regarding the above which has been noted.

Is mise le meas,

Olivia Walsh

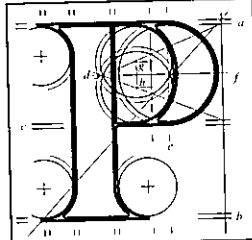
Olivia Walsh  
Inspector – Process Industries Unit.

10

Des O'Brien  
Director of Services  
Planning & Development  
**Wicklow County Council**  
Áras an Chontae  
Cill Mhantáin



An Bord Pleanála



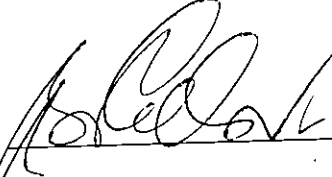
17<sup>th</sup> January 2011

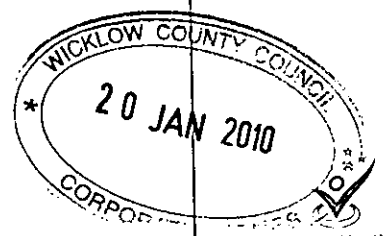
**Re: Proposed Amendments to the Draft Arklow Town and Environs  
Development Plan 2011-2017**

A Chara,

I wish to acknowledge receipt of your letter dated 11<sup>th</sup> January 2011 regarding the  
above and to thank you for same.

Is mise, le meas,

  
Bill Coleman  
Administrative Assistant  
[b.coleman@pleanala.ie](mailto:b.coleman@pleanala.ie)  
Ph: (01) 8737254



64 Sráid Maoilbhríde,  
Baile Átha Cliath 1.

Tel: (01) 858 8100  
LoCall: 1890 275 175  
Fax: (01) 872 2684  
Web: <http://www.pleanala.ie>  
email: [bord@pleanala.ie](mailto:bord@pleanala.ie)

64 Marlborough Street,  
Dublin 1.

11

**Leonora Earls**

**From:** Kevin Byrne [kevin.byrne@opw.ie]  
**Sent:** 15 February 2011 16:46  
**To:** Arklow Development Plan  
**Subject:** OPW Comments on Proposed Amendments for the Draft Arklow Town and Environs Development Plan

Dear Sir / Madam,

The OPW wishes to comment on the above as follows:

1. The OPW welcomes the inclusion of Flood Risk Management in the Draft Development Plan, the carrying out of a Flood Risk Assessment, and the following of the Flood Risk Management Guidelines.
2. The OPW welcomes the clarification that the Flood Risk outline maps shown in the Draft Plan are predictive flood maps.
3. The OPW would like to see more detail in the Flood Risk Assessment, on how specific lands identified as at risk of flooding have satisfied the Flood Risk Management Guidelines Justification Test, in particular for the proposed zoning in the Waterfront Area. This area is appears not to be within or adjoining the core of the established or designated urban settlement, as required by the Justification Test. The majority of this area is within Flood Zones A and B, yet it is proposed that residential will be the primary use of development in this area, with 800 units mentioned in the Proposed Amendments documents.

Regards,

Kevin Byrne  
Engineering Services



\*\*\*\*\*  
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South Beach, Arklow, Co. Wicklow  
Tel: 1890 AWD AWD (1890 293 293)

12

**Submission from Arklow Waste Disposal in relation to South Quay zoning in the 2011-2017 Arklow Town Plan**

A Chara,

In order to protect and preserve employment in Arklow Town and to assist the continuous use of existing buildings, we submit that the zoning on the South Quay be changed from Water Front to Employment 1.

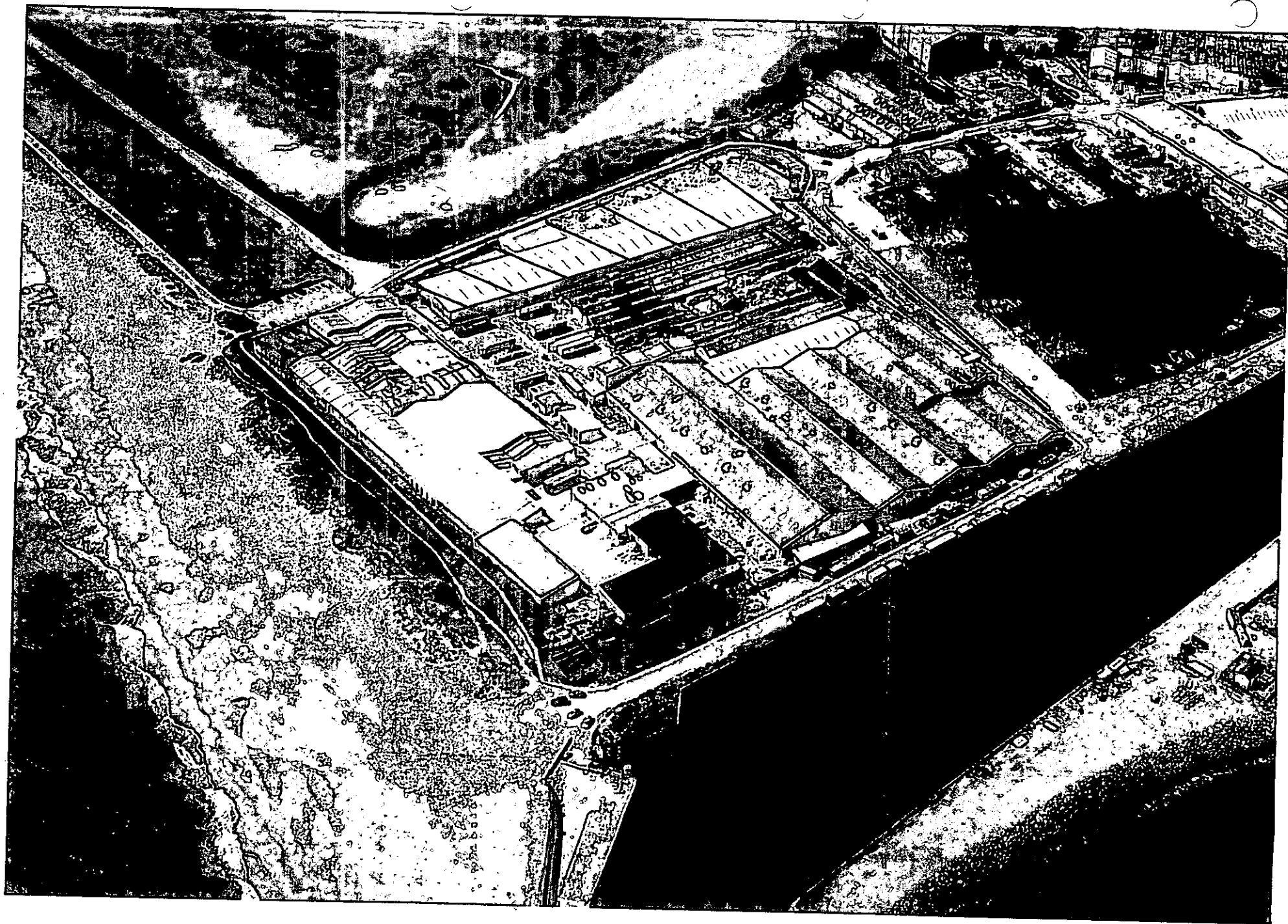
This will greatly improve the opportunities for companies to locate in this area.

From an Arklow Waste Disposal point of view we could even suggest that the Qualceram shed alone could be changed, if not the whole area. I enclose a picture of the shed in question (hatched Blue).

Kind Regards

Shane Byrne  
Director





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

Mr Des Nichols,  
Arklow Town Clerk,  
Arklow Town Council,  
Avoca River House,  
North Quay,  
Arklow.



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

Tel: 0402 26909  
Fax: 0402 26969

Email: [chamber@arklow.ie](mailto:chamber@arklow.ie)  
Web: [www.arklow.ie](http://www.arklow.ie)

11<sup>th</sup> Feb 2011

**Submission from Arklow Chamber of Commerce in relation to the Town Plan  
Zoning**

Dear Sir,

On behalf of the Chamber of Commerce in Arklow, please accept his letter and enclosures as a submission in relation to the Water Front Zoning Objectives in the New Town Plan.

It is the view of the Arklow Chamber that this zoning is too restrictive in respect of future development and does not take proper account of the new reality in relation to the future development of Arklow.

As you can agree it is evident that things have moved on from these types of zoning objectives due to the fact of the severe economic down turn and in particular plans for future hotels and apartments. Obviously the Chamber would have welcomed these developments had they happened but the reality is that all of these plans will probably be put on hold for at least the life of this plan.

The Chamber has carried out a full review of the infrastructure and current buildings in the waterfront zone and we feel that precluding any proposed use that would inhibit future industrial or port type development being considered in these areas.

It would be our view that waterfront zoning should operate alongside an E1 zoning for future employment at least for the duration of this plan.

There is a considerable amount of quality buildings and built infrastructure in the area, which will likely be allowed to turn derelict, such as other areas have done in the recent past. This should not be allowed to happen and if more buildings in the industrial areas of the town were turned to waste through their prolonged vacancy then further vandalism and no doubt further arson attacks will also occur.

To prevent the possibility of further negative aesthetic damage being caused to our town then we strongly urge the Council to desist from precluding specific industry locating in these existing industrial areas at this time.

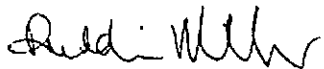
Obviously, should any industry locate in the current vacant structures in this area it will also have a huge positive impact on the rates base for the town, which I'm sure must be a strong enough reason for allowing as many businesses as possible to locate in the town given the pressure on employment and budgets in the current climate.

We also believe that any small degree of re-generation of these areas will attract additional industry and jobs to the area.

The focus of any Town Plan has to be the creation and supporting of employment and development; in light of the serious shift away from residential and leisure development at this time, we believe the Council should re-consider precluding specific uses in this area.

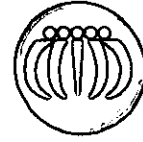
Thank you for your kind attention in this matter.

Yours Faithfully,



---

Freddie Millar  
Chamber President



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

**Submission from Freddie Miller Arklow Chamber of Commerce in relation to the Town Plan Zoning**

This submission relates to the North and South Quay parts of the town currently designated as Water Front Zoning

In order to take proper cognisance of the existing built infrastructure in the South and in this area that the following inserted into the town plan.

That this tandem with the objectives set out in the Town Plan for this area under the Water front Zoning that all commercial and industrial activity as permitted under E 1 zoning be included for the duration of this plan.

14

late Submission.

Leonora Earls

**From:** Mark Johnston [markjohnston@sla-pdc.com]  
**Sent:** 16 February 2011 09:31  
**To:** Arklow Development Plan  
**Subject:** Proposed amendments to Arklow Town & Environs Plan

Dear Brendan,

Further to our conversation I attach a copy of a submission on behalf of our clients, Dawnhill Properties. The submission relates to proposed Amendment No. 2.

The submission did not go through yesterday by e-mail and we trust that you can take our clients views into account.

Regards,

Mark Johnston  
Associate Director  
**STEPHEN LITTLE & ASSOCIATES,**  
Chartered Town Planning & Development Consultants,  
6 Upper Mount Street,  
Dublin 2.

**Tel.** (01) 676 6507  
**Fax.** (01) 676 6509  
**Web** <http://www.sla-pdc.com/>



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16/02/2011



**STEPHEN LITTLE & ASSOCIATES**  
Chartered Town Planning and Development Consultants

Town Clerk  
Arklow Town Council  
Avoca River House,  
North Quay  
Arklow  
Co. Wicklow

Our Ref: 10129

15 February 2011

**RE: PREPARATION OF THE ARKLOW TOWN & ENVIRONS DEVELOPMENT PLAN 2011-2017 – PROPOSED AMENDMENTS TO THE DRAFT DEVELOPMENT PLAN 2011-2017**

**FORMAL SUBMISSION REGARDING PROPOSED AMENDMENT NO. 2**

Dear Sir/Madam,

We are instructed by our client Dawnhill Properties, 4 The Courtyard, Carmanhall Road, Sandyford, Dublin 18 to make this submission in relation to the Arklow Town & Environs Development Plan. This submission is being made in response to the publication of the Proposed Amendments to the *Draft Development Plan 2011-2017*, currently on public display until 15<sup>th</sup> February 2011.

This submission is made by Stephen Little & Associates, Chartered Town Planning and Development Consultants, 6 Upper Mount Street, Dublin 2.

We confirm that we have carefully considered the content of the Proposed Amendments to the Draft Arklow Town & Environs Development Plan and the reports and Council meetings, which led to the Proposed Amendments, prior to preparing this formal submission. We are familiar of the Development Plan Guidelines for Planning Authorities and the provisions of the Planning & Development Acts, as amended, in particular regarding the requirements of a Core Strategy.

We request that Arklow Town Council has due regard to the contents of this submission when preparing and adopting the *Arklow Town & Environs Development Plan 2011-2017*.

**1 Objective of this Submission**

This submission relates specifically to Proposed Amendment No. 2, which relates to amendments to the text of Chapter 3: Settlement & Housing Strategy.

On review of the Manager's Report (November 2010) prepared in respect of the *Draft Arklow Town & Environs Development Plan 2011-2017*, it would appear that the Manager recommended significant amendments to Chapter 3 of the Draft Plan in response to submissions made by the Department of Environment, Heritage & Local Government and the Department of Transport.

We respectfully request that the Planning Authority reconsiders the allocation of residential development in the phasing strategy for Arklow and Environs, to ensure a more balanced and sustainable development of the area. The rationale for altering the phasing strategy is set out in Section 3 of this submission.

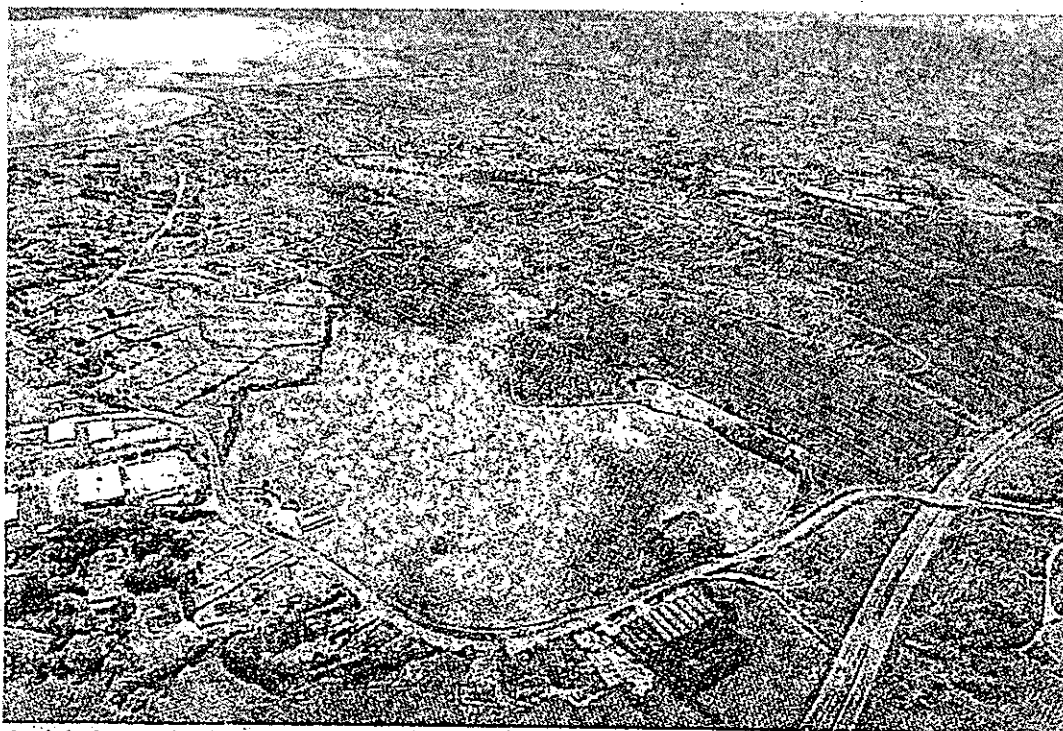
## 2 Subject Lands

Our client, Dawnhill Properties, controls c. 68 hectares of land in Kilbride. It is a Greenfield site for which a Masterplan has already been prepared, in consultation with Wicklow County Council, in order to guide sustainable, mixed use development of the overall lands.

The site is well located to assist in the orderly delivery of the sustainable expansion of Arklow, through the provision of a new residential neighbourhood and employment opportunities. The draft Masterplan includes a reserved site for a primary and secondary school, in addition to a neighbourhood centre, playing fields and amenity walkways linking the site back to the town centre core.

The site is bounded to the south by the town marsh. In this regard, the potential for flooding in the area has been given detailed consideration in accordance with the Flood Risk Guidelines issued by the Department of Environment, Heritage & Local Government. The lands zoned for development lie outside the flood risk areas established by the Draft Plan.

Furthermore, the service infrastructure required for the lands has been designed in full by our client's engineers. The services would be provided on a phased basis, as part of the overall Masterplan strategy.



*Aerial photo of subject lands*

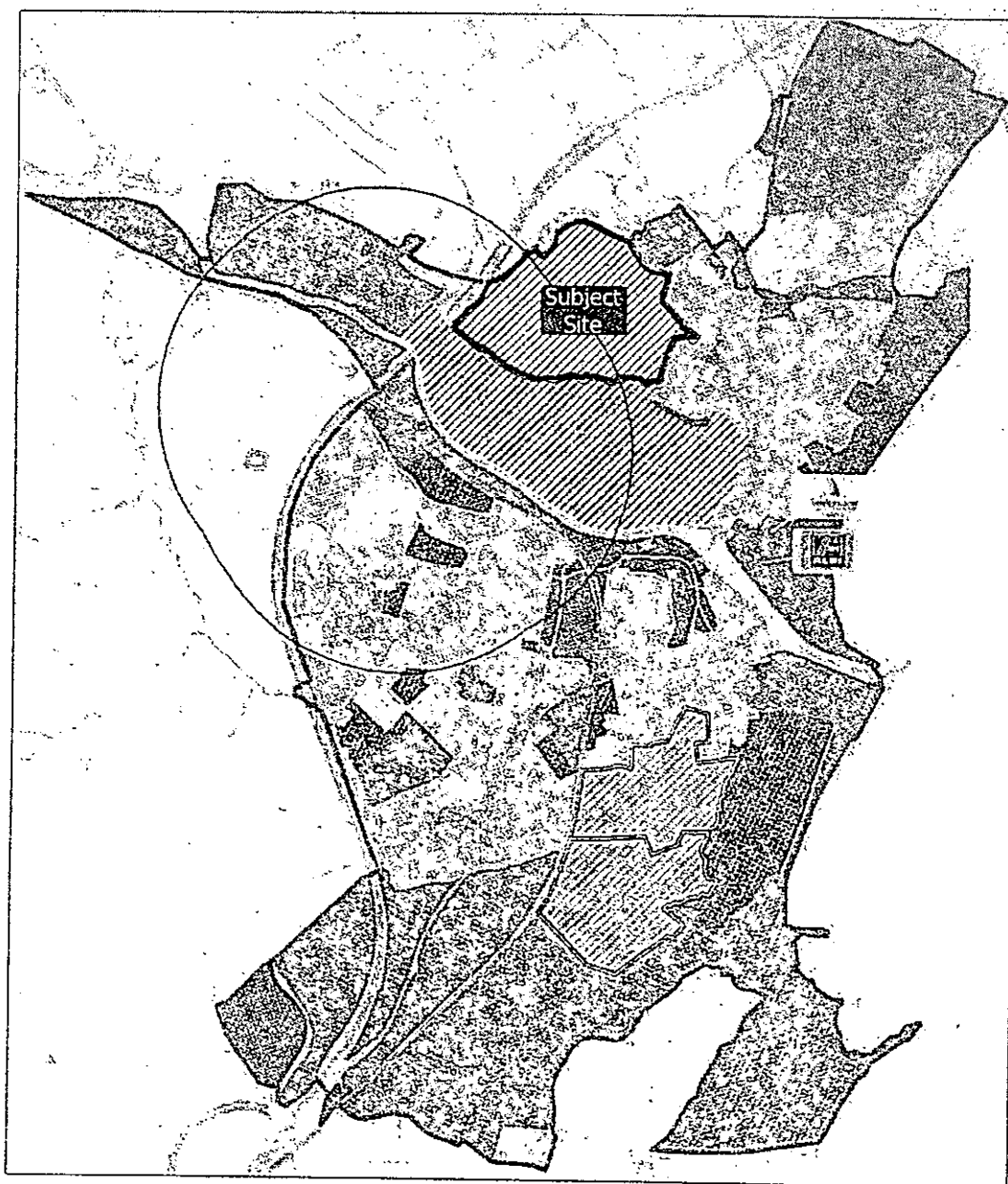


### 3 Planning Considerations

The draft Arklow Town & Environs Development Plan identifies the subject lands as an 'Action Area'. There are three Action Areas identified within the Plan boundary, two at Tinahask and our client's lands at Kilbride. The Amended Draft Plan states that these areas are suitable for a high proportion of the new residential development required in the plan area. Specifically, it noted at paragraph 2.3.3 of the Amended Draft Plan that:-

*"Three areas have been designated for significant mixed use development during the plan period these are referred to as Action Area Plans"*

The Kilbride lands have been identified for immediate development in the now current Development Plan for these lands - zoned R2. As a result, our clients have spent a considerable period of time and expenditure over the past 2-3 years agreeing an Action Plan for the lands with the Council and for determining a workable scheme for accessing and servicing the development of the lands.



The draft zoning map above indicates the subject lands and its proximity to the evolving urban core of Arklow, being the recent commercial developments at Ferry Bank such as Bridgewater Shopping Centre, Cinema and Aldi.

### 3.1 Serviceable Lands

As a result of the present zoned nature of the lands at Kilbride, our clients have spent the past number of years working with Wicklow County Council, Planning, Roads, Drainage and Water Services Departments to determine the optimum use of these lands.

Arising from these discussions, with Michael Tinsley of Water Services in particular, solutions have been arrived at which result in the lands being capable of being served by all necessary environmental services.

In relation to foul drainage, it is proposed to provide a Waste Water Treatment Plant on the Kilbride lands, which will not only service the development of these lands, but which will also treat effluent from the adjoining existing residential development in the North Arklow Environs. This Treatment Plant has been designed by RPS, Consulting Engineers.

Specifically, our clients have completed extensive site investigations across their land holding to source an adequate supply of potable water from ground wells. White Young Green, Consulting Engineers were commissioned in 2008 to undertake a comprehensive series of site tests to prove the water supply provision from these ground wells. It is again worth noting that the water supply from the Kilbride lands also has the potential to supply fresh water to the wider Kilbride/North Arklow Environs given the extent of reliable supply found on the lands.

Overall, the water supply and foul drainage proposals which can cater for the development of the Kilbride lands would result in a considerable boost to the existing public water and waste water treatment services for Arklow.

Vehicular access to the lands is readily available from the public road network.

### 3.2 Settlement Strategy

We note that the proposed Amendment No. 2 includes a new table, which details the intended capacity of the various residential zonings around Arklow and Environs. The table is listed as follows:

*Proposed amended 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

<b>TOTAL</b>		<b>4000</b>	
<b>Phase 1 (2011-2017)</b>		<b>2,150</b>	
<b>Phase 2 (post 2017)</b>		<b>1,850</b>	

The proposed amendments at Section 3.3.2 state that the development of zoned lands shall be permitted on a phased basis as set out in Table 3.4. Our clients were shocked to see 100% of their lands targeted for development post-2017 given the considerable dialogue and progress that had been made to date with the Planning Authority as regards the development of these lands.

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 can 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. We submit that in reality it is possible to determine that the lands will not meet the population targets now.

When regard is had to the expressed demand for 'total new residential units' at Table 3.3 of the Amended Plan (2,700 units to 2017) and that the Plan should make provision for 4,000 dwellings overall, these figures do not seem to bear any relationship to the Phase 1 (2011-2017) allocation at Table 3.4 of 2,150 units. This is 550 dwellings short of the 2,700 unit target set elsewhere in the Amended Plan. It would appear on the face of it therefore that there is a greater allocation to Phase 2 than is stated to be required elsewhere within the Plan. This may enable an allocation of some Phase 1 dwellings to our clients lands at Kilbride. In the context of the statement within the Amended Plan at paragraph 2.3.3 referred to above, we consider it would be appropriate and equitable to allocate a modest number of dwellings to the Kilbride lands, being the only zoned lands with no Phase 1 provision. The Planning Authority is requested to clarify this position.

We respectfully submit that the Planning Authority should also give consideration to reworking this phasing table in order to ensure the sustainable expansion of Arklow in a more balanced manner. In this regard, we submit that the subject site at Kilbride is well situated to deliver a modest portion of the required housing units in the first phase of the Plan, whilst not undermining the overall stated intention of the Plan as regards phased implementation.

In particular, we respectfully contend that the Planning Authority has overestimated the likely eventual capacity of lands as set out in the table above and certainly the timescale in which they are likely to occur. For example, if each of the above residential land use types delivered only 10% less than the capacity currently envisaged by the Planning Authority, then there would be a shortfall of some 215 units in Phase 1.

This shortfall could have a critical negative impact on the growth of Arklow Town and its environs. We submit that a 10% shortfall in the predicted totals is highly probable, given the

nature of the planning process and the particular issues associated with some areas identified for development in Phase 1.

For example, there is huge sensitivity around infill zones, where the protection of established residential amenities and established character of the area is of paramount concern. Therefore we would question the delivery of 250 units purely through infill around the town centre. In addition, these sites are in a myriad of disparate ownerships many of which may not come up for development in the lifetime of the Plan. These types of holdings generate development very infrequently as a result of these constraints.

Similarly, the Residential Consolidation zone primarily constitutes established residential areas with some potential for development are in a series of multiple ownerships where there is little chance of redevelopment occurring. These are people's homes and are not perceived as 'development opportunities' *per se*. It is more likely that each dwelling will consolidate in the form of extensions, etc but not that a significant uplift in dwelling numbers will arise. We acknowledge that there are exceptions to this scenario within the Plan area.

In addition, we submit that the issue of flooding will be a significant consideration at the Waterfront zone, which is likely to have an impact on the quantum of development that can be achieved once all the necessary flood assessments have been carried out. Furthermore, the land use zoning of 'Waterfront' has an objective "*To promote and provide for mix use development*". This zoning includes a wide variety of uses that are permitted in principle. We ask the Planning Authority to reconsider the predicted total of 800 units within the Waterfront Zone.

The proposed Amendments to the Plan state that a total of 2,700 new residential units are required in Arklow Town and Environs by 2017. Table 3.4 only allocated 2,150 units to the Plan period. We submit that the phasing plan proposed by the Planning Authority on the basis of its capacity assessment does not adequately ensure that this target will be met.

We note that the Plan continues to indicate the significant role the Kilbride lands will have in meeting the overall objectives for Arklow. In light of the serviced nature of the lands, together with its relative proximity to existing facilities, including the Bridgewater Centre, we would invite the Planning Authority to facilitate a modest quantum of development to occur on the Kilbride lands in Phase 1 in order that the new community may be allowed to establish itself.

In light of the constraints noted above in relation to the Infill Lands, the Waterfront area and the Residential Consolidation zone, we submit it would be prudent for the Planning Authority to include a modest allocation of housing at Kilbride in Phase 1, to account for the likely shortfall in the housing provision across the other sites identified above.

We consider it is noteworthy also to highlight that the development process is such that it will be several years before any house is actually occupied in Kilbride, even were it allocated a modest portion of the Phase 1 lands. The planning process itself, will typically take 12-18 months to be complete commencing with the making of a planning application. That is preceded by a pre-planning process, the preparation of a revised Masterplan given the change in the extent of zoning, all of which could add another year to the process. Thereafter you have to add the time it will take to comply with Conditions of a permission and then the construction phase, all of which occur before a dwelling is occupied.

It is therefore somewhere between two to two and a half years before a dwelling would be occupied at Kilbride. This is before account is had of the time it will take to adopt the new Arklow Plan, the period involved in constructing the necessary services to cater for the development and the vagaries of market forces. This would mean that a dwelling would not be occupied in Kilbride until early to mid.2013 at the earliest.

We propose therefore that Table 3.4 is altered to include 150 units at Kilbride in Phase 1 so as to enable the commencement of delivering this new community for Arklow. For convenience, we have highlighted the amendments to Table 3.4 in red text below.

*Table 3.4 Residential Zoning As Amended by this Submission*

<b>Location</b>	<b>Zoning</b>	<b>Capacity</b>	<b>Phase</b>
<i>Infill – Various</i>	<i>RE/TC</i>	<i>200</i>	<i>1</i>
<i>Waterfront Zone</i>	<i>WZ</i>	<i>750</i>	<i>1</i>
<i>Residential Consolidation – Various</i>	<i>R1</i>	<i>550</i>	<i>1</i>
<i>Tinahask – Abbeylands AA</i>	<i>AA</i>	<i>500</i>	<i>1</i>
<i>Tinahask – Money Big AA</i>	<i>AA</i>	<i>350</i>	<i>2</i>
<i>Kilbride AA</i>	<i>AA</i>	<i>150</i>	<i>1</i>
<i>Kilbride AA</i>	<i>AA</i>	<i>1,350</i>	<i>2</i>
<b>TOTAL</b>		<b>4000</b>	
<b>Phase 1 (2011-2017)</b>		<b>2,150</b>	
<b>Phase 2 (post 2017)</b>		<b>1,850</b>	

Our client is committed to developing the zoned lands at this location, as evidenced by the detailed consultation with the Planning Authority since August 2009. Releasing a modest portion of units in Phase 1 would enable the initial stages of the Masterplan to be implemented and ensure that there is adequate housing provided to meet with targets established by wider policy.

It is worth highlighting that this submission is not seeking to increase the number of dwellings within what is defined as Phase 1, merely it is seeking to allocate a modest 150 dwellings to the Kilbride area in Phase 1, having regard to the difficulties that are most likely to be encountered in achieving the number of dwellings in both the Infill, Waterfront and Residential Consolidation areas. Equally it is worth highlighting that the number of dwellings planned for these areas in the slightly amended phasing proposals under this submission remains ten times the number planned for the lands at Kilbride.

We would point out that the 150 dwellings being sought to be allocated to Kilbride is less than 7% of the required housing demand for Arklow as a whole over the Plan period.

As a result, the concept of developing a more compact urban core is still being achieved, as is the over-riding principle of sequential development and the overall intent of the phasing provisions of the Plan is maintained.

#### 4 Conclusion

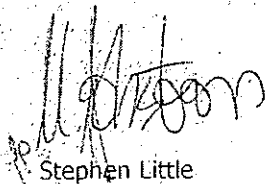
Our Client welcomes the opportunity to make this submission to Arklow Town Council in respect of the Proposed Amendments to the *Arklow Town & Environs Development Plan 2011-2017*.

In summary, our client is seeking a modest alteration to the allocation of Phase 1 residential development, such that 150 units are allocated to the growth area of Kilbride and a consequential drop of 50 units each from the 'Infill', 'Waterfront' and 'Residential Consolidation' areas from Phase 1 to accommodate this.

We would ask that Arklow Town Council and Wicklow County Council be mindful of the content of this submission in their preparation of the *Arklow Town & Environs Development Plan 2011-2017*. We request that any further correspondence be directed to this office.

We would welcome formal written confirmation of receipt of this submission, in due course.

Yours sincerely,



Stephen Little  
Managing Director  
**STEPHEN LITTLE & ASSOCIATES**