

Public/Prescribed bodies submissions on Draft Arklow T & E Plan 2010.

ID	Name	Submission prepared by
1	Minister of the Environment, Heritage and Local Government	Patrick O'Sullivan, Planning System and Spatial Policy
	Prescribed Bodies	
2	National Transport Authority	Gerry Murphy, Chief Executive Officer
3	Department of Education and Skills	Lorraine Brennan, Executive Officer
4	Office of Public Works	Michael Caden, Assistant Principal Officer
5	Department of Communications, Energy & Natural Resources	Carmel Conaty, Co-Ordination Unit
6	Health and Safety Authority	Olivia Walsh, Process Industries Unit
7	Inland Fisheries Ireland	William Walsh, District Director
8	Department of Transport	Michelle Cooke, Clerical Officer
9	Environmental Protection Agency	Tadhg O'Mahony, Senior Scientific Officer
10	Electricity Supply Board	Colm Brophy, Estates Manager
11	Wexford County Council	Pauline Doyle, Senior Executive Planner
12	National Roads Authority	Michael Mc Cormack, Policy Advisor
	Public Submissions	
13	Jonathan O'Toole	
14	Community Centre Action Group	F. Cregan
15	Marie Tyrell	
16	Dawnhill Properties	Stephen Little and Associates

Leonora Earls

From: Catriona Barrett [catriona_barrett@environ.ie]
Sent: 26 October 2010 15:12
To: Arklow Development Plan
Subject: Arklow Draft Development Plan



26.10.10 - Letter re ATT709186.txt
Draft Ark...

Dear Town Clerk,

Please find attached the Department's observations in relation to the above, a hard copy of which is in the post.

Regards,

Catriona Barrett,
Planning System & Spatial Policy,
Dept. of the Environment, Heritage & Local Government,
Custom House,
Dublin 1.

Tel :01 8882808



26 October 2010

Mr. Des Nichols,
Town Clerk,
Arklow Town Council,
Avoca River House
Arklow,
Co. Wicklow.

Re: Draft Arklow Town and Environs County Development Plan 2011-2017

Dear Mr. Nichols,

I am directed by the Minister of the Environment, Heritage and Local Government to refer to your recent letter in relation to the above and set out hereunder observations for consideration by the Council.

Wicklow County Council and Arklow Town Council are commended on producing a very comprehensive and legible draft plan, with a clear vision and strategic goals, however, as set out below, some issues have arisen which would benefit from further clarification.

Settlement Hierarchy

The plan contains key strategic objectives, which outline the vision for the town and its environs. The vision and key objectives could usefully be expanded to include the role that Arklow plays within the hierarchy of settlements within the county and the region.

Infrastructure

It is noted that both the SEA and the draft plan indicate the serious difficulties in Arklow regarding the provision of a Waste Water Treatment Plant. It is unclear from the draft plan if there is a time scale involved in its provision, if this timescale is likely to be met within the period of the plan and if not, what arrangements are in place or proposed, to ensure the

sustainable development of the area in the interim, the Council are requested to clarify same. In addition it is noted that the populations proposed during the lifetime of the plan (2017) and slightly beyond (2022) are in excess of the pe of phase 1 of the WWTP. The Council are requested to clarify if this matter is being resolved, either through the prudent use of phasing of residential development over the lifetime of the plan, or through seeking to upgrade or extend the plant, when it does commence.

Population

It is noted that the draft plan uses figures contained within the draft county plan. The draft county plan has indicated that the figures used may need to be revised in the light of the final figures used in the adopted RPGs for the Greater Dublin Area. The alignment of the county figures with the adopted RPGs may have implications for the Arklow figures, and this should be borne in mind at the later stages of this draft plan and the Arklow figures revised accordingly.

In arriving at the number of housing units required for Arklow within the plan period, and up to 2022, the methodology used seems to arrive at a greater number of housing required than the plan period plus head room. These numbers should be re-examined, and if necessary, reduced or a phasing programme introduced to ensure a prudent use of infrastructure, particularly bearing in mind the waste water treatment plant issue.

Economy

While it is recognised that the draft plan indicates that the job ratio for Arklow is lower than the county average, there would appear to be a large amount of land zoned for employment purposes, for a large growth town II particularly when it is considered that the greatest employment growth for the county should be focused into the metropolitan area of County Wicklow and Wicklow town in the hinterland. Given the large amount of undeveloped zoned land (220 ha) it is unclear why large areas of additional lands are being zoned for this purpose. A variation process can be used if in fact, during the lifetime of the plan, more land for this purpose is required. In particular it is noted that there are areas to the west of the N11 zoned for employment and tourism purposes, and which appear to take

access of the N11, consideration should be given to deleting these zoned lands and concentrating employment development to the east of the N11, closer to public transport, and other economic and social facilities. In addition it is unclear if the NRA have been consulted/ agreed to access arrangements from the western side of the N11 (It is noted that these lands are zoned similarly in the current plan).

Core Strategy

Section 2 of the draft plan called 'core strategy' provides some of the information, required under section 7 of the 2010 amendment act (amending section 10 of the 2000 act). Other parts of the required information are found in section 3. It would be beneficial if this information, and other required information (including a map or diagram) was included in the development plan at the amendments stage, as the plan would then be compliant with the 2010 amendment act and a further variation would not be necessary.

Guidelines

The draft plan should be amended so as to include appropriate reference to the draft guidelines for Planning authorities '*Spatial Planning and National Roads*' June 2010.

Archaeological Heritage

The Department considers the draft plan to contain satisfactory objectives for protection of archaeological heritage.

Yours sincerely,

Patrick O'Sullivan,
Planning System and Spatial Policy.

2

Leonora Earls

From: Conor O' Donovan [Conor.ODonovan@nationaltransport.ie]
Sent: 26 October 2010 14:47
To: Arklow Development Plan
Subject: NTA Submission on the Draft Arklow Town and Environs Development Plan 11-17

FYI,

Please find attached the NTA Submission on the Draft Arklow Town and Environs Development Plan 11-17,

Rgds Conor

<<NTA Submission on Arklow DP 11-17.pdf>>

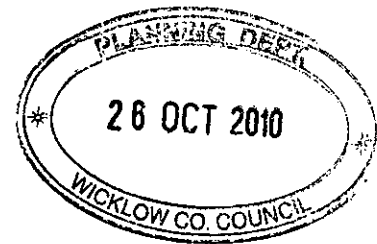
Conor O' Donovan

Údarás Náisiúnta Iompair

National Transport Authority
Floor 3, Block 6/7,
Irish Life Centre,
Lower Abbey Street,
Dublin 1.

Tel: + 353 (0)1 879 8300
Dir: + 353 (0)1 879 8317

Mail: conor.odonovan@nationaltransport.ie
Web: <http://www.nationaltransport.ie>



Town Clerk,
Arklow Town Council,
Avoca River House,
North Quay,
Arklow

26th October 2010

Dear Sir/Madam,

Re. Draft Arklow Town and Environs Development Plan 2011-17

The National Transport Authority (NTA) submits the following report on the draft Arklow Town and Environs Development Plan 2010-2016 (hereafter referred to as the Draft Plan). These comments focus on the following policy areas:

- Population and Housing
- Employment and Industry
- Parking
- Cycle/ Pedestrian Network
- Roads Objectives
- Airport Objectives

Population and Housing

Comments

In its submission on the preparation of the draft Arklow Development Plan 2011-2017, the NTA recommended that the Draft Plan should reflect the objective in the Development Plan Guidelines for Local Authorities (DOEHLG, 2007) that *“zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference”*.

The Draft Plan provides for enough zoned land to accommodate around 3,850 new residential units for the period up to 2022. This represents an additional 73% over the current total of c. 5,250 residential units in the plan area (June 2010).

Much of this land is peripherally located, including the Kilbride Action Area land which has the potential to accommodate 1,500 units. If these lands could develop prior to more centrally located lands, it will undermine the ability to achieve a more consolidated urban form, particularly if development and population growth occur at a lower rate than that anticipated in the Draft Plan.

Recommendation

The NTA recommends 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. This could be achieved on the basis of a phasing approach such as that in the Wicklow and Environs Local Area Plan which allows for the development of Wicklow Environs in an orderly manner and provides for the expansion of Wicklow Environs on lands closest to the town centre.

The above recommendation is consistent with the Planning and Development (Amendment) Act 2010 where "*a core strategy shall, in respect of the area in the development plan proposed to be zoned for residential use,... provide details of... (ii) how the zoning proposals accord with national policy that development of land shall take place on a phased basis*" (Section 7C, (d)).

Employment and Industry

Comments

Employment Zoned Land

The Draft Plan has provided for enough employment zoned land to accommodate 9,000 new jobs, representing a 234% increase over the number of jobs located in the town in 2006. Taking into account the relatively small current local employment base and the substantial decline in employment over the period 2008-2010, the achievement of this level of employment growth up to 2020 seems unlikely. Furthermore, for any employment growth assumption, some explanation of the basis for this growth, including a sectoral analysis, would be appropriate.

In light of these concerns, the NTA recommends that the Draft Plan be amended to clearly specify how the development of employment zoned land would be phased, designating a significantly smaller total area of land available for employment up to 2020 and, in doing so, provide a supporting rationale for both the quantum and type of employment envisaged. This may require the dezoning of some of the excess land zoned, especially lands located close to the two M11/N11 interchanges to the north and south of the town.

Employment and Population Growth

In its submission on the preparation of the draft Arklow Development Plan 2011-2017, the NTA stated that the "*linking of employment growth to population growth should...be a key objective in any development strategy for the town*". The Draft Plan acknowledges that "*the level of enterprise has not kept pace with residential development*" and it is the goal of the plan to "*facilitate an increase in the number of jobs in Arklow and to bring jobs closer to where people live*"(p48).

The Development Plan needs to ensure that future residential development and employment growth occur in tandem, to ensure that commuting to the Metropolitan Area does not increase significantly as the population of the town increases. This

might involve a mechanism by which employment levels within the town are monitored on a regular basis and linked to the release of residential zoned land.

Employment Intensive Development

To minimise the need to travel between activities, key person-trip intensive activities (e.g. office developments) should, insofar as possible, be located within Arklow Town Centre. 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 is critical to ensure that the development of peripherally located lands do not undermine the development potential of lands in more central and locally accessible locations.

There is a large amount of employment land to the North and South of Arklow which is designated with zoning objectives E1 and E2 in the Draft Plan. Inter alia, these zonings allow for office development of an unspecified scale. The NTA recommends that these zoning objectives should be amended to ensure that employment intensive development cannot be located on these lands.

Recommendation

The NTA recommends that the Draft Plan should be amended to clearly specify how the development of employment zoned land would be phased, designating a significantly smaller total area of land available for employment up to 2020 and, in doing so, provide a supporting rationale for both the quantum and type of employment envisaged. This may require the dezoning of some of the excess land zoned, especially lands located close to the two M11/N11 interchanges to the north and south of the town.

In the event that the employment growth targets are not achieved, the Development Plan needs to ensure that future residential development and employment growth occur in tandem, to ensure that commuting to the Metropolitan Area does not increase significantly as the population of the town increases. This might involve a mechanism by which employment levels within the town are monitored on a regular basis and linked to the release of residential zoned land.

In general, for employment intensive uses, accessibility by public transport, cycling and walking and location within Arklow Town Centre should be the primary considerations. The NTA recommends that the zoning objectives E1 and E2 should be amended to ensure that employment intensive development cannot be located on these lands.

Car Parking

Comment

In its submission on the preparation of the draft Arklow Development Plan 2011-2017, the NTA stated that "*car parking standards for new developments should be specified as maxima across all non-residential land uses, with the specific level of*

parking provision being determined on the basis of certain location criteria and development characteristics. These could include proximity to existing and future public transport services and proximity to the town centre, where complimentary land uses can facilitate shared car parking due to trip linking or non-conflicting trip patterns”.

Whilst, the Draft Plan recognises the principle of parking provision being determined on the basis of certain location criteria and development characteristics, the car parking standards are presented as “appropriate car parking provision” and not specified as maxima across all non-residential land uses. The NTA recommends that car parking be specified as maxima across all non-residential land uses.

The Greater Dublin Demand Management Study (GDDMS) recommends that parking provision for new developments should not exceed the maximum standards set out below in Table 6.2. The car parking standards in the Draft Plan should reflect the proposed maximum regional parking standards. The GDDMS can be viewed at the following web address: <http://www.dto.ie/web2006/TDMS.pdf>.

Table 6.2: Proposed Maximum Regional Parking Standards (non residential use)

	Maximum Parking Standard (per gross floor area unless otherwise specified)	Threshold from and above which standard applies (gross floor space)
Employment, including offices	1 space per 50 m ²	1,500 m ²
Food retail	1 space per 14m ²	1,000 m ²
Non food retail	1 space per 20 m ²	1,000 m ²
Cinemas and conference facilities	1 space per 5 seats	1,000 m ²
Higher and further education	1 space per 2 staff - 1 space per 15 students	2,500 m ²

Source: Greater Dublin Demand Management Study (DTO), p55

Recommendation.

The NTA recommends that car parking standards be specified as maxima across all non-residential land uses.

The car parking standards in the Development Plan should reflect the proposed maximum regional parking standards (see above).

Cycle/ Pedestrian Network

Comment

The Arklow IFPLUT recommendations included a cycle network for the town centre and its environs and this network was included in the current Arklow Town Development Plan 2005-2011. In its submission on the preparation of the Draft Plan, the NTA stated that this network may now need to be reviewed/ expanded to reflect recent development patterns and specific development objectives pertaining to the period of the next Development Plan.

The Draft Plan states that permeability of the town will be enhanced through the *"facilitation and promotion of opportunities for safe pedestrian and cycling linkages to and within the town centre, employment areas, schools and public transport nodes"* (p34). However, the details of the potential cycle and pedestrian network has not been specified in the Draft Plan.

Recommendation.

The NTA recommends that a cycle and pedestrian network be specified in the Development Plan.

Roads Objectives

Comment

Objective NR2 (p34) of the Draft Plan proposes the *"facilitation of the construction of a new third interchange at Lamberton, providing a connection to the western distributor road as allowed for in the design of the Arklow Bypass"*. This proposed 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 interurban route. The NTA recommends that this interchange be excluded from the Development Plan.

The scale of local road provision proposed in the Draft Arklow Plan is substantial. In general, the inclusion of the other roads objectives included in the Development Plan should be clearly objective led and consistent with the policies set out in *Smarter Travel* (DoT). A phased approach to roads provision in line with the phased development of related zoned lands should be set out in the Draft Plan.

Recommendation

This proposed interchange at Lamberton should be excluded from the Development Plan.

A phased approach to roads provision should be included in the Development Plan, in line with the phased development of related zoned lands.

Airport Objective

Comment

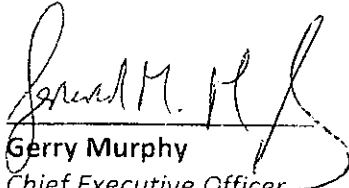
Objective AHMP3 in the Draft Plan promotes Arklow as a location of a new international airport. The NTA considers that Arklow is a wholly inappropriate location for an international airport for the following reasons.

An international airport at this location, at some remove from any major centre of population, would require airport passengers and employees, to travel significantly longer distances on average, compared to a less remote location. Under these circumstances, as the large majority of these trips are likely to be by road, the proposal is clearly contrary to *Smarter Travel* and emerging NTA Strategy objectives.

Recommendation

The objective to promote Arklow as a location for a new international airport should not be included in the Development Plan.

Yours sincerely,


Gerry Murphy
Chief Executive Officer



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

18th October, 2010

Re: Draft Arklow Town & Environs Development Plan 2011-2017

Dear Sir/madam,

I refer to the recent letter from Ms. Leonora Earls of Wicklow County Council regarding the above mentioned plan and invitation for submissions on same.

It is noted that the Department of Education & Skills criteria for calculating the amount of additional school places required and the need or otherwise for additional schools has been applied by the Local Authority using the projected population figures for the town. The Department agrees with the provision of 3 additional schools will be required to meet the needs of Arklow up to 2022.

In the circumstances, the Department has no further comment to make on the plan.

Trusting the above is in order.

Yours sincerely,

Lorraine Brennan

Lorraine Brennan
Executive Officer
Forward Planning Section



Leonora Earls

From: micheal caden [michael.caden@opw.ie]
Sent: 26 October 2010 18:07
To: Arklow Development Plan
Cc: Kevin Byrne; Peter Lowe
Subject: Fwd: OPW Comments on the Draft Arklow Town and Environs Development Plan

Dear Sir / Madam,

Please see below, OPW's comments in relation to flood related aspects of the draft Plan. If you have any queries in relation to the comments please contact Mr. Peter Lowe Tel 01-647 6743.

1. The OPW welcomes the following of the Planning and Flood Risk Management Guidelines by the Draft Town Development Plan, and the identification of flood zones for the town of Arklow. However it is not defined in the Draft Plan whether the flood zones shown are indicative or predictive. Could this be clarified in the Plan?
2. We welcome the statement in the Draft Plan that the future development of the urban settlement has satisfied the justification test. However there is no detail in the Draft Plan as to how the zonings for different lands in the flood zones have satisfied the justification test. Has a Flood Risk Assessment been carried out to an appropriate level of detail? Is there another document which has details of how the justification test was satisfied for these lands?
3. We note that the justification test is included as a Flood Management Objective in the Draft Plan. While we welcome the inclusion of certain aspects of the justification test as Flood Management Objectives, we feel that the justification test and sequential approach should have already been used by the Local Authority to determine the zoning of that land, and that it would not be appropriate for use in planning applications.

Yours sincerely,

Michael Caden
Assistant Principal Officer
Engineering Services

Important Notice

The information in this e-mail and any files transmitted with it are confidential and may also be legally privileged intended solely for the individual or entity to whom they are addressed and are not intended to be relied upon by any person without subsequent written confirmation of its contents. The content of this e-mail is the personal view of the sender and does not represent the advice, views or opinion of the Office of Public Works. Accordingly, the Office of Public Works disclaims all responsibility and accepts no liability (including in negligence) for the consequences of any person acting, or refraining from acting, on such information prior to the receipt by those persons of subsequent written confirmation. In particular (but not by way of limitation) the Office of Public Works disclaims all responsibility and accepts no liability for any e-mails or their attachments which are defamatory, offensive, racist or which in any other way are in breach of an individuals rights, including breach of confidence, privacy or other rights. If you have received this e-mail message in error, inform us immediately at info@opw.ie and delete it and all copies from your system.

This footnote also confirms that this e-mail message has been checked for the presence of computer viruses.

Leonora Earls

From: Carmel Conaty [Carmel.Conaty@dcenr.gov.ie]
Sent: 26 October 2010 17:25
To: Arklow Development Plan
Subject: Draft Arklow Town and Environs Development Plan 2011-2017



Tuesday, 26 October 2010

Town Clerk
 Arklow Town Council
 Avoca River House
 North Quay
 Arklow

Our Ref: 5466

Draft Arklow Town and Environs Development Plan 2011-2017

To whom it may concern,
 With reference to your correspondence dated 14th August 2010 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

Disclaimer:

This electronic message contains information (and may contain files), which may be privileged or confidential. The information is intended to be for the sole use of the individual(s) or entity named above. If you are not the intended recipient be aware that any disclosure, copying, distribution or use of the contents of this information and or files is prohibited. If you have received this electronic message in error, please notify the sender immediately.

This is also to certify that this mail has been scanned for viruses.

Tá eolas sa teachtaireacht leictreonach seo (agus b'fhéidir sa chomhaid ceangailte leis) a d'fhéadfadh bheith príobháideach nó faoi rún. Is le h-aghaidh an duine/na ndaoine nó le h-aghaidh an aonáin atá ainmnithe thuas agus le h-aghaidh an duine/na ndaoine sin amháin atá an t-eolas. Murab ionann tusa agus an té a bhfuil an teachtaireacht ceaptha dó bíodh a fhios agat nach gceadaítear nochtadh, cóipeáil, scaipeadh nó úsáid an eolais agus/nó an chomhaid seo. Más trí earráid a fuair tú an teachtaireacht leictreonach seo cuir, más é do thoil é, an té ar sheol an teachtaireacht ar an eolas láithreach.

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



HSA Head Office, Metropolitan Building, James Joyce Street, Dublin 1

18/08/2010

Town Clerk
Arklow Town Council
Avoca River House
North Quay
Arklow

Re: Draft Arklow Town Development Plan 2011-2017 & your letter of 14th August 2010

Dear Sir/Madam,

The Health & Safety Authority is an Authority prescribed under Article 13 of the Planning & Development Regulations 2001-6 and as such is required to be consulted in relation to Development Plans under sections 11-13 & 24 of the Act.

The approach of the Authority to Land-use Planning is set out in the document 'Policy & Approach of the Health and Safety Authority to COMAH Risk-based Land-use Planning'. It is available from our website at

[http://www.hsa.ie/eng/Your Industry/Chemicals/Control of Major Accident Hazards/Land Use Planning/](http://www.hsa.ie/eng/Your_Industry/Chemicals/Control_of_Major_Accident_Hazards/Land_Use_Planning/)

The document should be consulted to fully understand the advice given in this letter.

The Authority would expect the planning guidelines to contain:

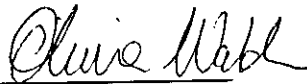
1. An indication of planning policy in relation to major accident hazard sites notified under the regulations, which reflects the intentions of Article 12 of Directive 105/2003/EC.
2. The consultation distances supplied by the Health & Safety Authority to Wicklow County Council in relation to such sites. These distances to be indicated on the various maps included in the plan, as well as any more specific distances and advice supplied by the Authority .

3. A policy on the siting of new major hazard establishments, taking account of Article 12 and the published policy of the Authority in relation to new developments, including developments in the vicinity of such establishments.
4. Mention of the following notified site.

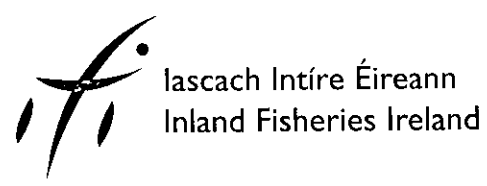
Sigma- Aldrich Ireland Limited, Vale Road, Arklow

If you have any queries please contact the undersigned.

Yours sincerely



Olivia Waish
Process Industries Unit



Town Clerk
Arklow Town Council
Avoca River House
North Quay
Arklow
County Wicklow

20 August 2010

Re: Draft Arklow Town & Environs Development Plan 2011 – 2017

Dear Sir,

With reference to the above, please note that a number of watercourses run through the areas covered by the Arklow Town and Environs Plan.2011 – 2017. One of these is a tributary of the Ballyduff / Avoca system, the other is the Templeraíne Stream. Significant stretches of the lands adjoining the Ballyduff / Avoca tributary have been zoned for commercial, residential and industrial development. We welcome the fact that a the lands adjoining the Templeraíne Stream have been designated as a “Green Route” as have the some of the lower reaches of the Ballyduff stream tributary.

Our policy is to maintain watercourses in their open natural state in order to prevent habitat loss, preserve and enhance biological diversity and aid in pollution detection. Given the importance of the watercourses we request that the entire Ballyduff Stream tributary and a stretch of land on either side be zoned as a “Green Route” - linear park / wildlife corridor. It is important that this designation be extended to the headwaters of the system through the townlands, Bogland, Kish, Ballynattin and Money Little. Disturbance of riparian habitats should be minimised and an undisturbed buffer zone between development area and river bank should be maximised (10m minimum) where development takes place in these areas. Riparian vegetation should be retained in as natural a state as possible at all times.

The extension of the “Green Route” - linear park / wildlife corridor through the industrially zoned area in the Kish area (referred to above) would be in line with the Draft County Wicklow Heritage Plan 2009-2014 which includes a number of actions including “Support the development of a ‘Green corridors’ strategy for the Council, to identify and encourage integrity and connectivity between important sites such as waterways and woodlands”.

Yours faithfully

William Walsh
William Walsh
District Director

W. Sted



21 October 2010

Town Clerk
Arklow Town Council
Avoca River House
North Quay
Arklow

Draft Arklow Town and Environs Development Plan 2011-2017

A chara,

The Department of Transport have no observations to make in relation to the Draft Arklow Town and Environs Development Plan 2011-2017.

Yours sincerely

Michelle Cooke
Clerical Officer
Management Services Unit
Department of Transport
25 Clare Street
Dublin 2

Ph: 01-6041313

Email: managementservicesunit@transport.ie



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

12th October 2010

Our Ref: SCP091001

Re. Draft Arklow Town and Environs Development Plan 2011 – 2017 and Strategic Environmental Assessment Environmental Report

Dear Town Clerk,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 14th August 2010, regarding the above. Please find attached the Environmental Protection Agency's submission in relation to the Draft Arklow Town & Environs Development Plan and Draft Environmental Report, (hereafter referred to as the Plan).

We refer you to Annex 1 of Directive 2001/42/EC (SEA Directive) and Schedule 2B of European Communities of S.I. No. 436 of 2004- Planning and Development (Strategic Environmental Assessment) Regulations 2004, the SEA Regulations, for "*Information to be contained in an Environmental Report*".

The EPA is a statutory environmental authority under the SEA Regulations. In its function as a statutory SEA environmental authority, the EPA does not approve Draft Plans. This submission highlights key issues, which have been raised through various reporting and assessment functions of the EPA.

The main purpose of this submission is to promote the full integration of the key findings (mitigation measures and recommendations) set out in the SEA Environmental Report (ER) and the HDA are fully integrated in a transparent manner within the Plan.

The Agency welcomes and acknowledges the inclusion of many of the points made in our scoping submission.

Specific Comments on the Plan and the SEA Environmental Report

Clarify how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, (i.e. "*secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects*"), have been assessed and documented. In particular, you are referred to potential cumulative effects / in-combination effects in relation to other Plans / Programmes / Strategies / Projects.

Clarify how the SEA has influenced the location of and proposed development of the Action Areas within the Plan. This is of particular relevance in the context of potential significant environmental effects including cumulative and in-combination effects.

It should be ensured that proposed zoning of lands and development within the Plan area is subject to provision of adequate and appropriate Wastewater Treatment Infrastructure. It is of ongoing concern to the Agency, that the wastewater treatment plant serving Arklow is non-compliant with the overall requirements of the Urban Wastewater Treatment Regulations (2001) and the proposed upgraded treatment plant is still outstanding.

It should be ensured that in the Plan Objectives/Policies, prioritisation is given to including a definite commitment to addressing wastewater treatment and capacity issues within the lifetime of the Plan, given the lack of secondary treatment to date.

Section 3.5 *New Residential Development* of the Plan highlights areas proposed for significant development in the Plan through the establishment of three "Action Areas" at Tinnahask, Money Big & Kilbride. The Plan should promote the integrated planning for adequate and appropriate infrastructure to service any development proposed and authorised during the lifetime of the individual land use plans within the Plan area. The development of these "Action Areas" should be carried out in a phased and appropriate manner.

The inclusion of *Section 8.12.2 Energy Objectives* is acknowledged. The reference in Objective E2 to the development of wind energy developments being in accordance with the *County Wicklow Wind Energy Strategy* is noted. Clarification should be provided whether SEA has been applied to this Strategy. You are reminded of Article 9 of S.I. No. 435 of 2004 pertaining to the "*Requirement to carry out environmental assessment*" for energy related plans/programmes/strategies. The requirements of the Habitats Directive in relation to the above Strategy should also be considered as appropriate.

Section 5.7 Aviation, Harbours, Marinas & Ports includes *Objective AHMP3* which promotes Arklow as a location for a new international airport and associated development. Any such development proposal should be in line with Regional Planning Guidelines and promote sustainable development in accordance with National and EU Legislation as appropriate and relevant. A clear justification should be provided for the need to provide an international airport rather than improving transportation links to existing aviation infrastructure.

Amendments to the Draft Plan

You are reminded that it is a matter for Wicklow County Council and Arklow Town Council to determine whether or not the implementation of any proposed amendments to the Draft Plan likely to arise from consultation would be likely to have significant effects on the environment.

This assessment should take account of the SEA Regulations Schedule 2A Criteria (S.I. No. 436 of 2004) and should be subject to the same method of assessment as undertaken in the "environmental assessment" of the Draft Plan. Screening should also be undertaken of any proposed amendments, for Habitats Directive Assessment requirements where appropriate.

SEA Statement

You are also referred to the requirement to prepare an SEA Statement outlining "*Information on the Decision*" as required by Article 16 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.

Should you have any queries or require further information in relation to the above, please contact the SEA Unit at sea@epa.ie.

Yours sincerely

Tadhg O'Mahony
Senior Scientific Officer
SEA Section
Office of Environmental Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork
email: sea@epa.ie



**Draft Arklow Town and Environs Development Plan 2011 – 2017
and Strategic Environmental Assessment (SEA) Environmental
Report
Environmental Protection Agency Comments 6th October 2010**

**SECTION 1: INTEGRATION OF ENVIRONMENTAL
CONSIDERATIONS IN THE LAND USE PLANS**

The comments below relate to the integration of the environmental considerations and recommendations that have been set out in the Environmental Report, as well as the additional information highlighted by the EPA, within the Plan. Suggestions are put forward for consideration with a view to addressing the integration of a number of key environmental considerations within the Plan.

The EPA is a statutory Environmental Authority under the SEA Regulations. The EPA's role in SEA in relation to Land Use Plans focuses on promoting full integration of the findings of the Environmental Assessment into the Plan. It is not the function of the EPA to either approve or enforce Land Use Plans.

It should be clarified how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, (i.e. "*secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects*"), have been assessed and documented. In particular, you are referred to potential cumulative effects / in-combination effects in relation to other Plans / Programmes / Strategies / Projects.

Clarify whether the SEA has influenced the location of and proposed development of the Action Areas within the Plan, in terms of the assessing likelihood for potential significant environmental effects including cumulative and in-combination effects.

It should be ensured that proposed zoning of lands and development within the Plan area is subject to provision of adequate and appropriate Wastewater Treatment Infrastructure. It is of ongoing concern to the Agency, that the wastewater treatment plant serving Arklow is non-compliant with the overall requirements of the Urban Wastewater Treatment Regulations (2001) and the proposed upgraded treatment plant is still outstanding.



SUMMARY OF KEY ENVIRONMENTAL ISSUES AND KEY RECOMMENDATIONS

Waste Water	Recommendations
Lack of Secondary Wastewater Treatment	<p>It should be ensured that in the Plan Objectives/Policies, prioritisation is given to including a definite commitment to addressing wastewater treatment and capacity issues within the lifetime of the Plan, given the lack of secondary treatment to date.</p> <p>It should be ensured that proposed development is subject to the ability to provide adequate and appropriate wastewater treatment to cater for current and projected population of the Plan area.</p>
Wastewater disposal and treatment systems & Septic Tanks	<p>Consideration should be given to inclusion of a specific policy to require the <i>Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e ≤ 10)</i>, (EPA, 2009) is taken into account, where connection to the town's wastewater treatment system is unfeasible.</p>

Drinking Water	Recommendations
Drinking Water Quality	<p>It should be ensured that the Arklow Public Water Supply currently on the EPA's Remedial Action List is appropriately mitigated.</p>

Flooding	Recommendations
Flood Risk Assessment	<p>Consideration should be given into assessing existing zoned undeveloped lands for flood risk in the context of ensuring appropriateness of landuse. Zoning, De-zoning or re-zoning options should be considered as appropriate in areas of high flood risk.</p>



1 WATER

1.1 Water Framework Directive

The Plan promotes the protection of surface water, groundwater, coastal and estuarine water resources and their associated habitats and species, including fisheries through inclusion of numerous Objectives highlighted in particular in *Chapter 7 Natural & Built Heritage*. This is welcomed and acknowledged.

You are also referred to the full range of Protected Areas within the Eastern River Basin Districts (RBDs) as set out in Annex IV 1(i) – (v) inclusive of the Water Framework Directive. These should be taken into account in the Drafting of the Plan. This should include reference to RPA Beaches adjacent to the Plan area (Clogga beach to the South, and Brittas Bay South to the North of the Plan area.). In proposing the upgrading of wastewater treatment facilities servicing the town, consideration should be given to ensuring protection of these protected areas.

The Plan should refer to the recent Surface Water legislation '*Environmental Objectives (Surface Waters) Regulations 2009*' 2009 (S.I. No 272 of 2009), where relevant and appropriate. You are referred to the Legislation at:

<http://www.environ.ie/en/Environment/Water/WaterQuality/EnvironmentalObjectivesSurfaceWatersRegulations2009/>

1.2 Drinking Water/Water Supply

The SEA and Plan making processes seek to address drinking water supply capacity, leakage and quality in the Plan area, through a series of Objectives outlined in *Chapter 8 Service Infrastructure-Water, Waste & Energy. Section 8.4.1 Water Objectives* contains a number of specific Objectives in relation to drinking water which are acknowledged. In the context of strengthening the commitment to provide drinking water, consideration should be given to amending Objective W6 to refer to "*To provide an adequate and appropriate town water supply, which is safe and secure....*"

The Plan should implement the European Communities (Drinking Water)(No.2) Regulations 2007 and should implement and include, as appropriate, the relevant recommendations set out in *The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007-2008, (Office of Environment Enforcement- EPA, 2009)*. You are referred to this Report at: <http://www.epa.ie/downloads/pubs/water/drinking/>

The Plan should refer to the EPA guidance handbook on the *Implementation of the Regulations for Water Services Authorities for Public Water Supplies* that has been prepared under the European Communities (Drinking Water) (No.2) Regulations 2007. This guidance is available at <http://www.epa.ie/downloads/pubs/water/drinking/>. It contains guidance for local authorities on the implementation of the Drinking Water Regulations, including statutory and binding guidance on certain issues as is required under the Regulations.

The Plan should include, where applicable, specific objectives for the improvement of any water supplies in the Plan area, in particular the Plan should address the specific objectives to be achieved where these water supplies are included on the EPA's Remedial Action List. This list can be found at: <http://www.epa.ie/downloads/data/water/>. Guidance has also been published by the EPA on the Remedial Action List (RAL) and is available in the Drinking Water Handbook mentioned above at <http://www.epa.ie/downloads/pubs/water/drinking/>.



It is noted that in the most recent RAL, the drinking water plant serving Arklow, is present for the following reason “*Supply identified by the HSE where further investigation or improvement maybe required*”. It is noted that the proposed action measures include “*Treatment plant to be upgraded and recommendations of the EPA audit to be implemented*”, however this is still outstanding.

The EPA has also published a series of Drinking Water Advice Notes, which cover the following areas:

- Advice Note No. 1: Lead Compliance Monitoring and Surveys
- Advice Note No. 2: Action programmes to restore the quality of drinking water impacted by lead pipes and lead plumbing
- Advice Note No. 3: E.coli in Drinking Water
- Advice Note No. 4: Disinfection By-Products in Drinking Water
- Advice Note No. 5: Turbidity in Drinking Water
- Advice Note No. 6: Restoring Public Water Supplies Affected by Flooding

These can be found at: <http://www.epa.ie/downloads/pubs/water/drinking/>

These Advice Notes set out EPA guidance on the actions that are necessary following exceedances of these parameters and also the preventative measures that should be taken to improve the security of the supply to prevent a repeat failure in the future. This is provided in the context of the EPA recommended approach to managing a drinking water supply i.e. the Water Safety Plan Approach. Please be aware that EPA Lead Guidance Circulars No.s 1 and 2 have been reissued as Advice Notes No.s 1 and 2 though there has been no change to the text of these documents.

As set out in the recommendations referred to above, the Local Authority must develop appropriate solutions that may involve abandoning or replacing drinking water sources, upgrading the treatment facilities or improving management and operational practices.

1.3 Waste Water Treatment

The Plan, in *Chapter 8 Service Infrastructure-Water, Waste & Energy*, includes a number of Objectives relating to wastewater treatment. In *Section 8.4.1 Water Objectives*, consideration should be given to inclusion of an Objective to prioritise the provision of an upgraded treatment plant at Seabank, within the lifetime of the Plan. Development and the zoning of lands as proposed in the Plan should only be approved subject to provision of adequate and appropriate service infrastructure being in place prior to approval being granted. With a view to strengthening Objective W1, consideration should be given to amending as follows “...collected and discharged after ***adequate and appropriate*** treatment in a safe and sustainable manner...”

The Plan should highlight the requirement under *The Waste Water Discharge (Authorisation) Regulations* for all for all wastewater discharges, including storm water discharges which come within the scope of these Regulations to be licensed. In this regard, the Plan should highlight the specific requirements of Regulations 43 & 44 of the *Waste Water Discharge (Authorisation) Regulations, 2007*, S.I. No. 684 of 2007, regarding the consideration of proposals and consultation on such proposals by Planning Authorities and An Bord Pleanála, where applications for proposed development are being considered and decided upon.

<http://www.environ.ie/en/Environment/Water/WaterQuality/RHLegislation/FileDownload,15542,en.pdf>



The Plan should implement the Urban Waste Water Treatment Regulations 2001 and 2004 and promote, as appropriate, specific provisions for the implementation of the relevant recommendations set out in *Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2006 and 2007* (EPA, 2009). You are referred to this Report at: <http://www.epa.ie/downloads/pubs/water/wastewater/>

The EPA has published a *Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e ≤ 10)*, (EPA, 2009). This Code of Practice (CoP) establishes an overall framework of best practice in relation to the development of wastewater treatment and disposal systems, in unsewered rural areas, for protection of our environment and specifically water quality. The Code replaces previous guidance issued by the EPA on wastewater treatment systems for single houses (EPA, 2000) and incorporates the requirements of new European guidelines, recent research findings and submissions and comments received during the consultation process. It is available from the link provided above.

The Plan through Objective W3 commits to only permitting development proposals subject to the provision and maintenance of adequate and appropriate wastewater treatment infrastructure to service zoned lands and developments within the Plan area, which is welcomed and acknowledged.

Where the introduction of additional lands for development is being proposed within the Plan area, relevant Policies/objectives should be included in the Plan, and as appropriate, to promote assessment of the adequacy of the existing wastewater treatment facility (ies) in terms of both capacity and performance and the potential risk to human health and water quality. Where relevant, the potential impact on habitats and species of ecological importance should be addressed.

The Plan should include as appropriate measures to ensure that trade effluent in the area covered by the Plan is managed properly and discharged to sewer in accordance with relevant discharge licences where appropriate.

1.4 Groundwater Protection

The Plan includes clear Objectives for the protection of groundwater resources and associated habitats and species, through inclusion of Objectives W7, WS2, WS4 and AG3 which are acknowledged and welcomed.

Consideration should also be given, where relevant and appropriate, to promotion of the inclusion of Objectives in the Plan for the following:

- *Enforcement of Planning Conditions related to installation, operation and maintenance of on-site wastewater treatment / septic tank systems.*
- *Connection of all remaining houses within Town Boundary to the Wastewater Treatment Plant.*
- *The development of a wastewater leak detection programme. The use of a strategic metering system to aid in leak detection should be considered*
- *The implementation and enforcement of the European Communities (Good Agricultural Practice for Protection of Waters) Regulations 2009.*



1.5 Bathing Water

The most recent report on Bathing water quality '*The Quality of Bathing Water in Ireland – A Report for the Year 2009, (EPA, 2010)*' sets out the status of Irish Seawater and Freshwater Bathing areas. You are referred to this report at:
<http://www.epa.ie/downloads/pubs/water/bathing/>

"The purpose of the Bathing Water Regulations is the protection of human health", and the relevant local authorities, where appropriate, "should ensure that where any bathing water fails the mandatory bathing standards that the public are made ware of this fact by means of information notices posted at the bathing area." To this effect the Plan should include as appropriate a Policy/ Objective to ensure this requirement is complied with.

You are also referred to the new "*Directive on bathing water (Directive 2006/7/EC)*" which came into force on 24 March 2006 and which will repeal the existing 1976 Directive with effect from 31 December 2014. The new Directive is implemented in Ireland by the new *Bathing Water Quality Regulations 2008 (S.I. No. 79) of 2008.*

The Plan should promote the protection of waters within the Plan area that are used for bathing. The Water Framework Directive Register of Protected Areas, identifies two Protected Beaches (Clogga Beach and Brittas Bay South), outside the Plan area which should be taken into consideration, in particular in the context of the proposed upgrading of the wastewater treatment plant and potential for cumulative and in-combination effects.

1.6 Water Conservation

The commitment given in Objective W9 to promote conservation of water is acknowledged and welcomed. In this context, the development of a Water Conservation Strategy should be considered, and where relevant addressed in combination with adjoining local authorities. The Strategy should address new and existing developments within the Plan area. Where such a Strategy is being developed, specific timescales should be assigned to its preparation with clear responsibilities and timescales for its implementation.

1.7 Water Services Act 2007- Strategic Water Services Plans

The Plan should consider the inclusion of an Objective to promote / support proper planning and sustainable development including sustainable use of water resources.

1.8 Flood Prevention and Management

Section 8.5 Flooding includes a number of Objectives in relation to flood risk. The Plan should however, promote the appropriate zoning of lands and restriction of use in areas liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas. It is noted that Objectives are included to provide for/promote appropriate flood risk assessments to be undertaken, where development(s) and zoning are being proposed in the Plan area where there is risk of flooding. The Plan includes a commitment to integrate appropriate Sustainable Urban Drainage Systems through Objectives FL5 and W5 which is acknowledged.

It should, however be clarified whether an assessment of existing zoned undeveloped lands or proposed zoning of lands have been carried out, in the context of determining appropriateness of land use. It should also be clarified if any zoning/de-zoning/rezoning of lands have resulted from the flood risk assessment carried out in line with the *Flood Risk Management Guidelines (DoEHLG/OPW 2009)*.



The Plan provides, in Objective FL6, for protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary. See definition of "Wetlands" in - *Wetlands Conservation and Protection in EPA Code of Practice: Environmental Risk Assessment for Waste Sites (EPA, 2007)*. The full report is available at:

http://www.epa.ie/downloads/pubs/other/corporate/oeecop_waste_sites_consultation_draft.pdf

1.9 Integration of infrastructure, zoning and development

Where zoning/rezoning of lands and the introduction of new development is being proposed within the Plan area, the Plan should ensure the adequacy of the existing water supply/wastewater treatment facilities and associated networks are assessed. This should address both capacity and performance and the potential risk to human health, water quality and water quantity. The potential impact on habitats and species of ecological importance should also be addressed as appropriate, from pressures impacting on water quality and quantity.

Zoning for development within the Plan area should be linked to availability and adequacy of water supply/waste water treatment infrastructure and capacity. The provision of adequate and appropriate infrastructure in advance of development within the Plan area should be promoted through the Plan.

The above requirements should be promoted in the Plan and as appropriate should be reflected in relevant Policies/Objectives associated with relevant Land Use and other relevant Plans within the Plan area.

2 BIODIVERSITY

2.1 EU Protected Habitats and Species in Ireland

The Plan includes a clear Objective to protect all designated habitats and species within the area through. Refer to the Water Framework Directive Register of Protected Areas in particular those relating to biodiversity, which may be relevant for the Plan area.

The Plan should include Policies/Objectives to ensure that the local authority, in fulfilling its responsibilities in the supply of services, zoning of lands and authorisation of development, addresses the threatened habitats and species identified in the National Parks and Wildlife Service Report "*The Status of EU Protected Habitats and Species in Ireland*", (NPWS, Department of the Environment, Heritage and Local Government, 2008) which occur within or adjoining the LA areas.

http://www.npws.ie/en/media/Media_6440.en.pdf

The inclusion of Objective BD2 which commits to maintaining the favourable conservation status of all proposed and future Natural Heritage Areas (NHAs and pNHAs) including the Arklow Marsh is welcomed and acknowledged. The inclusion of Objective BD3 which commits to protecting native natural linkages such as hedgerows, trees and watercourses are important ecological corridors is also noted.

The Plan should include any sites listed on the Water Framework Directive Register of Protected Areas in particular those relating to biodiversity, occurring in the Plan area.



Fisheries

The Plan should promote the guidance from the Regional Fishery Boards, including where appropriate and relevant:

- *Fishery Guidelines for Local Authority Works* (DCENR, 2008)
See: <http://www.nrfb.ie/environment/las.htm>
- *Guidelines on the Planning, Design, Construction & Operation of Small-Scale Hydro-Electric Schemes and Fisheries* (DCENR, 2007).
See: <http://www.cfb.ie/publications/hydro.htm>
- Eastern Regional Fisheries Board Guidance Notes '*Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites*' (Eastern Regional Fisheries Board, 2006). See:
<http://www.fishingireland.net/environment/constructionanddevelopment.htm>
- *Maintenance and Protection of the Inland Fisheries Resource during Road Construction and Improvement Works - Requirements of the Southern Regional Fisheries Board* (Southern Regional Fisheries Board, 2007). You are referred to this guidance note at: <http://www.srfb.ie/about/roads.html>

Mineral Abstraction and Natura 2000 Sites

You are referred to the recent EU guidance in relation to "*Undertaking Non-Energy Extractive Activities in Accordance with Natura 2000 Requirements*" which should be taken into consideration and referenced as appropriate and relevant to the Plan. In relation to ongoing mining operations at Avoca, in the vicinity of the Plan area, there would be merits in applying this guidance, as appropriate and relevant, to the protection of nationally designated protected species and habitats.

You are referred to this guidance at:

http://ec.europa.eu/environment/nature/natura2000/management/docs/neej_n2000_guidance.pdf

Appropriate Assessment

The Plan includes a clear Objective (Objective BD7) that sets out a requirement for Appropriate Assessment Screening for new/reviewed/amended Plans or proposed projects, being prepared by the local authority for the Plan area that may have the potential to impact on Natura 2000 sites. The potential for cumulative / in-combination effects associated with other relevant Plans/ Programmes / Projects should also be determined.

Buffer Zones

The Plan promotes the provision/application of appropriate buffer zones between designated ecological sites and areas zoned for development through inclusion of Objectives WS5 and BD3. Where the application of buffer zones is being considered, you should consult with the National Parks and Wildlife Service (NPWS) of the Department of Environment, Heritage & Local Government (DOEH&LG) with regard to their application and implementation. The Regional Fisheries Board should also be liaised with where fisheries protection is a concern / objective.



2.2 Non-Designated Habitats and Species

The Plan has taken into account existing Local Heritage / Biodiversity Plans, including the County Wicklow Heritage Plan (2009-2014) and Arklow Urban Habitat Mapping (2008) which is acknowledged. The Plan promotes the protection non-designated habitats, species and local biodiversity features including rivers, wetlands, hedgerows, individual trees, streams, grassland, coastal areas etc. through numerous Objectives put forward in *Chapter 7 Natural and Built Heritage* which are welcomed. Consideration should be given to the provision of appropriate buffer zones between local biodiversity features and areas zoned for development.

2.3 Alien species and Noxious Weeds

The Plan should promote the implementation of measures to control and manage alien/invasive species (e.g. Japanese knotweed, Giant Hogweed, Zebra Mussel etc.) and noxious weeds (e.g. Ragwort, thistle, dock etc.) within the Plan area.

Invasive Species Action Plans are available for a number of species on the Invasive Species Ireland website. Information on invasive species can be found at:

<http://www.invasivespeciesireland.com/>

The National Roads Authority has produced a report entitled the "Management of Noxious Weeds and Non-Native Invasive Plant Species on National Roads" which can be found at: <http://www.nra.ie/Publications/DownloadableDocumentation/Environment/file.16172,en.pdf>

The measures set out in these documents should be applied at a Plan level where appropriate and could control further spread of these species at county and local level as appropriate.

2.5 Inland waters – rivers, streams, wetlands

The inclusion of Objectives WS1 - WS5 relating to protecting rivers and stream corridors and valleys by reserving riparian zones / ecological corridors, maintaining them free from inappropriate development, minimising alterations and discouraging culverting or realignment is noted and welcomed.

3 AIR, NOISE AND CLIMATIC FACTORS

3.1 Noise

The inclusion of a number of noise related objectives as described in *Chapter 8 Service Infrastructure-Water, Waste & Energy*, as highlighted in *Section 8.10 Noise Pollution* is noted.

3.2 Air & Climatic Factors

The Plan includes a number of Objectives in relation to reducing greenhouse gas emissions / improving air quality as provided for in *Section 8.9 Air Emissions*, and *Section 5.2 Public Transport* are acknowledged.

The Plan should promote specific Objectives and associated provisions for the development and promotion of appropriate climate change adaptation and mitigation measures that can be implemented through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc.

The objectives of EU and Irish air quality legislation is "to avoid, prevent or reduce harmful effects on human health and the environment as a whole", and the relevant local authorities,



where appropriate, “*shall promote the preservation of best ambient air quality compatible with sustainable development.*” To this effect the Plan should include as appropriate an Objective to ensure this requirement is complied with.

Consideration should be given to promoting specific Policies / Objectives in the Plan for the protection and improvement, as appropriate, of air quality within the Plan area, particularly in areas zoned for increased urban and transport related development.

4 ENERGY CONSERVATION/RENEWABLE ENERGY

The inclusion of *Section 8.12.2 Energy Objectives* is acknowledged. The reference in Objective E2 to the development of wind energy developments being in accordance with the County Wicklow Wind Energy Strategy is noted. Clarification should be given whether SEA has been applied to this Strategy. You are reminded of Article 9 of S.I. No. 435 of 2004 pertaining to the “*Requirement to carry out environmental assessment*” for energy related plans /programmes/strategies. The requirements of the Habitats Directive in relation to the above Strategy should also be considered as appropriate.

The commitment to facilitate the development of offshore wind energy projects (Objective E3) should be mindful of the National Offshore Renewable Energy Development Plan which is currently undertaking SEA. It should be ensured that the development and approval of these projects will take into consideration any objectives/policies and related likely to be made as relevant and appropriate.

In relation to Objectives E3 and E5, the requirements of the EIA and Habitats Directives are also brought to your attention.

Consideration should be given to the inclusion in the Plan, as appropriate, of a Policy/Objective in relation to the preparation and implementation of “An Energy Conservation Strategy” and associated awareness campaign within the Plan area. Specific timescales should be assigned to the preparation of such a strategy.

The Plan promotes, where appropriate, the use of renewable energy systems (e.g. solar, wind, geothermal etc.) within the Plan area through inclusion of a number of Objectives which is welcomed. The Plan also provides for the promotion of energy conservation measures in buildings, which is acknowledged.

5 LANDSCAPE CHARACTER ASSESSMENT

The Plan promotes the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of regional, county and local value through inclusion of Objective VP1. There would be merits in also assessing particular areas of seascape, coastscape and riverscape areas of significant landscape character in/adjacent to the Plan area to be afforded protection in the Plan.

The Plan should also take into account the landscape character adjoining the Plan area. There is a need to take into account landscape features and designations adjoining the Plan area.

Consideration should also be given to promoting the requirement for an appropriate “Visual Impact Assessment” for proposed development with potential to impact adversely on



significant landscape features within the Plan area. The Plan should promote the application of standard impact assessment methodology for all such development.

Consideration should also be given to the promotion of the designation, and use of, agreed and appropriate viewing points for these assessments. The scope of each assessment should be agreed in consultation with the relevant Planning Department staff.

The Plan should promote the recognition of visual linkages between established landmarks and landscape features including seascape, coastscape and views which should be taken into account when land is being zoned and when individual development proposals are being assessed / considered within the Plan area.

6 HUMAN HEALTH / QUALITY OF LIFE

The Plan should ensure provision of adequate and appropriate infrastructure and to serve both the existing community and likely future predicted increases in population within the Plan area.

In preparing the Plan, there would be merits in exploring current practice and opportunities with respect to promoting the protection and, as appropriate, improvement of "Quality of Life". Where relevant, the application of existing "Quality of Life Indices" would be considered in consultation with relevant statutory and non-statutory bodies/organisations.

You are also referred the relevant aspects already referred to above under water, biodiversity, air, energy.

7 TRANSPORTATION

The Plan promotes the provision of sustainable modes of transport in Objectives put forward in *Chapter 5 Transportation*. It is noted that Objective PT5 promotes the provision for large scale employment and residential developments with a feeder bus services for an initial period. Clarification should be given on how sustainable transportation links will be provided for after this initial period. An assessment of the adequacy of existing and proposed public transportation services should be factored into to the approval process for large scale employment and residential developments.

Section 5.7 Aviation, Harbours, Marinas & Ports includes *Objective AHMP3* which promotes Arklow as a location for a new international airport and associated development. Any such development proposal should be in line with Regional Planning Guidelines and promote sustainable development in accordance with National and EU Environmental Legislation as appropriate and relevant. A clear justification should be provided for the need to provide an international airport rather than improving transportation links to existing aviation infrastructure. Clarify the extent to which this assessment in the SEA.

Development proposals including harbour, marina and port developments should take into account the requirements of the EIA and Habitats Directives as appropriate, including an assessment of cumulative environmental and in-combination environmental effects.

The Plan should promote the development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions within the Plan area. In particular the preparation of Integrated Traffic Management Plans, where relevant and



appropriate, for the *existing urban areas and proposed new urban developments* should be promoted as appropriate through the Plan. This approach should address the short, medium and long-term traffic management requirements within the Plan area.

8 TOURISM

Chapter 6 Economic Development, including Retail & Tourism includes a number of Objectives as outlined in Section 6.11.2, in relation to Tourism aspects of the Plan. The Plan should however, promote where relevant and appropriate long term, sustainable planning for tourism within the Plan area. There may be merits in considering the promotion of the preparation of Integrated Sustainable Regional Tourism Strategy for the Plan and adjoining areas. Development of tourism related infrastructure should also be linked to the availability to provide adequate and appropriate service infrastructure, in accordance with the relevant Legislation and Guidance, in advance of proposals. It should also be ensured that an assessment of the existing availability and capacity of holiday homes be assessed prior to the approval of further such development proposals.

9 INFRASTRUCTURE PLANNING

Section 3.5 - *New Residential Development* of the Plan highlights areas proposed for significant development in the Plan through the establishment of three "Action Areas" at Tinnahask, Money Big & Kilbride. The Plan should promote the integrated planning for adequate and appropriate infrastructure to service any development proposed and authorised during the lifetime of the individual land use plans within the Plan area. The development of these "Action Areas" should be carried out in a phased and appropriate manner.

These Action Areas are further described in *Chapter 10 Action Areas*. It should be clarified if these proposed development areas have been assessed as part of this SEA or whether they will be assessed at a later stage, given the significant amount of lands proposed for development (38.5ha for Tinnahask-Money Big and 60.8 ha for Kilbride.) It should also be clarified to what extent has the SEA considered alternatives with respect to these Action Areas. Has the proposed zoning taken into account the most recent population predictions in the GDA RPG 2010 - 2022. It should also be clarified these Action Areas will be subject to assessment under the SEA and Habitats Directives.

In particular, the Plan should promote the provision of adequate and appropriate wastewater treatment, water supply, surface and storm water drainage, transport, waste management, community services and amenities etc. on planned and phased basis to address any current problems and/or deficits and to reflect predicted increases in population during the life of individual plans adopted within Plan area.

10 URBAN WASTE WATER DISCHARGE LICENSING

The Plan should refer to the requirement under The Waste Water Discharge (Authorisation) Regulations, (highlighted above in Section 1.3) for all for all wastewater discharges, including storm water discharges which come within the scope of these Regulations to be licensed. The EPA is currently in the process of licensing discharges from wastewater treatment facilities.



11 WASTE MANAGEMENT

Section 8.7 Solid Waste Management of the Plan contains numerous Objectives (WM1 – WM6) in relation to the management of solid waste and enforcement of littering / illegal dumping within the Plan area which are welcomed and acknowledged.

The Plan should promote the integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity. Priority should be given to provision of adequate and appropriate waste related infrastructure in advance of any development.

The Plan should also seek to incorporate relevant guidance and legislation to address issues such as Waste Prevention, Food Wastes, Identification of Historic Landfill Sites, Backyard Burning, Brown Field Development etc

12 ENVIRONMENTAL IMPACT ASSESSMENT (EIA)

The Plan should highlight that under the EIA and Planning and Development Regulations certain projects that may arise during the implementation of the Plan may require an Environmental Impact Assessment. There are also requirements with regard to EIA for sub-threshold development. In this regard, you are referred to the following Publications:

- “*Guidelines on Information to be contained in Environmental Impact Statements*” EPA, 2002.
- “*Advice Notes on Current Practice in the preparation of Environmental Impact Statements*”, EPA 2003.

In addition to the above, you are referred to the Department of the Environment, Heritage and Local Government’s Publication:

- “*Environmental Impact Assessment (EIA) Guidance for consent Authorities regarding sub-threshold development*”, DoEH&LG, 2003.

These documents can be downloaded at: <http://www.epa.ie/downloads/advice/ea/guidelines/>

It should be noted that the Projects would also be required to be screened with respect to the requirement for Habitats Directive Assessment/Appropriate Assessment as required by Article 6 of the Habitats Directive.

You are also referred to the recently published DoEHLG guidance available in relation to Appropriate Assessment ‘*Appropriate Assessment of Plans and Projects in Ireland*’ (DoEHLG, 2009) at:

<http://www.npws.ie/en/media/NPWS/Publications/CodesofPractice/AA%20Guidance.pdf>

13 STRATEGIC ENVIRONMENTAL ASSESSMENT(SEA)

Consideration should be given to the inclusion of a specific Policy/Objective in the Plan to ensure full compliance, with the requirements of *Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment – The SEA Directive* and the associated *Planning and Development (Strategic Environmental Assessment) Regulations, 2004*.

Arklow Town Council and Wicklow County Council (the LA’s) need to be cognisant of their responsibilities with respect to the SEA Directive and related SEA Regulations through the



Plan. This is of relevance to County Development Plans, Town Plans, Local Area Plans including reviews, variations and amendments etc.

The Plan should promote the development and implementation of Procedures to ensure compliance with the requirements of the SEA Directive and related SEA Regulations for all Land Use Plans within the Plan area.

14 OBLIGATIONS WITH RESPECT TO NATIONAL PLANS AND POLICIES AND EU ENVIRONMENTAL LEGISLATION

The Plan should refer to the LA's responsibilities and obligations in accordance with all national and EU environmental legislation. It is a matter for the Local authorities 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.

Environmental Liabilities Directive

As outlined in DoEHLG Circular Ref: EPS/01/09, the LA should be cognisant of the Environmental Liability Directive (2004/35/CE), (ELD), which enforces the Polluter Pays Principle and has been transposed and is now in force in Ireland. In many aspects of their work local authorities are considered "operators" under the legislation and are now liable for any Environmental Damage (damage to water; soil; and species and habitats as defined in the legislation) which they commit.

The EPA has been designated as the competent authority for the ELD and has obligations to pursue remediation in cases where Environmental Damage has occurred; or seek preventative measures where an imminent threat of Environmental Damage is posed due to the actions of any operator, whether they are public or private sector.

The EPA will be publishing comprehensive guidance on the Environmental Liability Directive in 2010. More information on the directive is currently available at www.epa.ie and the Environmental Liability Unit of the Agency can be contacted at eluinfo@epa.ie

15 EPA REPORT: IRELAND'S ENVIRONMENT 2008 "MAIN ENVIRONMENTAL CHALLENGES"

The Plan should include relevant Policies and Objectives are included, to address, where appropriate, the "Main Environmental Challenges" for Ireland as set out in Chapter 16 – "Main Environmental Challenges" of EPA Ireland's Environment 2008 (EPA, October 2008). These are as follows:

Limiting and Adapting to Climate Change

1. Mitigating the causes and effects of climate change
2. Adapting to climate change impacts
3. Improving our understanding of climate change

Reversing Environmental Degradation

1. Preventing eutrophication and other water pollution
2. Protecting natural habitats and species populations
3. Remediation of contaminated land

Complying with Environmental Legislation and Agreements

SCP... Draft Development Plan and Environmental Report
EPA Comments 12.10.2010



1. Building of a culture of compliance
2. Enforcement of legislation at national and local levels
3. Meeting EU and other international obligations

Mainstreaming of Environmental Considerations

1. Incorporating environmental considerations into policies and plans
2. Ensuring environmentally responsible businesses
3. Changing behaviours

This Chapter can be downloaded at:

<http://www.epa.ie/downloads/pubs/other/indicators/irlenv/43366%20epa%20report%20chap%2016.pdf>

The LA in implementing the Plan and in fulfilling its responsibilities should ensure Plan – making authorities take into account and address, where appropriate, the relevant Environmental Challenges” set out above.

SECTION 2: ENVIRONMENTAL REPORT

The comments below relate to the Strategic Environmental Assessment Process and the Environmental Report. Comments and suggestions in this Section are put forward for consideration and mainly relate to the key stages and outputs of the SEA Process.

The inclusion of environmental sensitivity maps in addition to the other environmental maps / figures are welcomed and acknowledged. It is evident that there is a clear integration between the SEA and Draft Plan. Clarification however, should be given whether the SEA including these maps has influenced the location of and proposed development of the Action Areas within the Plan, in terms of the assessing likelihood for potential significant environmental effects including cumulative and in-combination effects.

The promotion of aviation related infrastructure and the proposed “Action Areas” should also be assessed with regards to these sensitivity maps and in the context of the surrounding environment, in conjunction with other key influential plans such as the Wicklow County Development Plan, Regional Planning Guidelines, and National Development Plan etc.

Clarify how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, (i.e. “*secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects*”), have been assessed and documented. In particular, you are referred to potential cumulative effects / in-combination effects in relation to other Plans / Programmes / Strategies / Projects. The use of a table to summarize the assessment of environmental effects should be considered.

It should be ensured that proposed zoning of lands and development within the Plan area is subject to provision of adequate and appropriate Wastewater Treatment Infrastructure. It is of ongoing concern to the Agency, that the Arklow wastewater treatment plant serving the Plan area remains non-compliant with the overall requirements of the Urban Wastewater Treatment Regulations (2001) and that the proposed upgraded treatment plant is still outstanding.

SCP... Draft Development Plan and Environmental Report
EPA Comments 12.10.2010



Update References to Greater Dublin Area Regional Planning Guidelines (GDA RPG) 2010-2022

Consideration should be given to amending the references to the Draft Greater Dublin Area Regional Planning Guidelines to refer now to the adopted Regional Planning Guidelines (GDA RPG) 2010-2022.

Specific Comments on the Non Technical Summary

In general the Non-Technical Summary presents the environmental sensitivities of the Plan area in a clear and concise manner which is welcomed. Consideration however, should be given to including in the Non Technical Summary (NTS) of a sub-section 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.

Section 3.0 Summary of Baseline Environment / Existing Environmental Problems facing the Plan area

- Consideration should be given to inclusion in the NTS of *Figure 3.11 Flooding* from the Environmental Report under the appropriate heading.

Section 4.0 Strategic Environmental Objectives

- Consideration should also be given to inclusion of SEO's for energy conservation, water conservation and amending existing Biodiversity SEO's for invasive species management and control.

Section 5.0 Alternative Plan Scenarios

- There would also be merits in providing a table showing the assessment of each development alternative against each SEO to highlight the reason for selection of the preferred alternative. This assessment should also address the full range of effects as required under the SEA Directive including *short, medium, long, cumulative effects* etc.

Specific Comments on the Environmental Report

Section 3 Baseline Environment Description

- 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.
- The inclusion of *Section 3.3.10 Urban Habitat Mapping Study* is welcomed and acknowledged.
- *Section 3.4 Population and Human Health* refers to an estimated population for the Plan area in the region of 19,000 persons by 2016. It is noted that the proposed upgraded wastewater treatment plant would only cater for a capacity of 18,000p.e. The projected population targets should involve the phased introduction of residential lands subject to capacity and appropriate treatment being established.



- *Section 3.6.2 Risk Assessment:* The footnote relating to the Avoca Estuary should be updated to refer to "...**benthic**..." rather than "...*bottom of the sea*..." as appropriate, given that Benthic riverine/estuarine/marine flora and fauna may be affected. A similar correction should be considered for the footnote on page 42.
- *Section 3.6.7 Water Supply:* It should be noted that the Arklow Public Water Supply is currently on the EPA's Remedial Action List for the following reason "*Supply identified by the HSE where further investigation or improvement maybe required*". The proposed Action Programme involves "*Treatment plant to be upgraded and recommendations of the EPA audit to be implemented*".
- 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*. It may be a clerical error to be updated as appropriate.
- *3.6.9 Flooding:* It should also be acknowledged that the OPW have identified recurring instances of flooding at numerous locations within the Plan area, South Quay Fairgreen, South Green, Condren's Lane, Ferrybank, the Brook, Porters Bridge and along the Avoca River as highlighted on www.floodmaps.ie
- *3.6.11 Flood Risk Management Guideliens for Local Authorities* on Page 40 refers to "SEA may recommend ...removal of existing zonings for all types of development on the basis of unacceptable high level of flood risk..." Clarify whether the SEA has proposed zoning changes in relation to flood risk within the Plan.
- *Section 3.8 Waste Water:* The description of a projected population for the Plan area by 2016 of 19,000 persons in the context of a proposed upgraded wastewater treatment plant with a capacity for 18,000 p.e would appear to conflict with the principles of sustainable development. Consideration should be given to ensuring development progressed/permitted in line with the ability to provide adequate and appropriate wastewater treatment capacity.

Section 4 Strategic Environmental Objectives

The format of this section is to be welcomed, as is the description of SEO's and associated indicators and targets.

- In the context of strengthening SEO B2, consideration should be given to amending this SEO to refer also to "*invasive species control and management*" as appropriate and relevant.
- Drinking Water SEO DW should also consider inclusion of a reference to a "*safe and secure*" water supply being provided.
- Consider inclusion of SEO's in relation to Energy Conservation and Water Conservation.

Section 5 Context for the Development Plan

- The inclusion of this section shows a clear example of integration between the Plan and the SEA. The context of the Plan in relation to other influential Plans / Programmes etc is acknowledged.



Section 7 Evaluation of Alternative Plan Scenarios

- The inclusion of Figure 7.1 *Overall Sensitivity Map* is acknowledged as is the assessment methodology.
- The inclusion of Table 7.5 *Evaluation Against SEO's* is noted. Consideration should also be given to assessing the full range of effects as provided for in Schedule 2B(f) of S.I. No. 436 of 2004 including in particular cumulative effects, short term effects, medium term effects etc

Section 9 Mitigation Measures

The inclusion of specific Objectives from the Draft Plan which relate to the different environmental topics is welcomed and acknowledged.

In relation to flooding, consider inclusion of another mitigation measure for assessment of potential rezoning/dezoning of existing zoned undeveloped lands required / provided for as means of mitigating flood risk, following an assessment of appropriateness of land use.

Section 10 Monitoring

- Section 10.4 should consider inclusion of a reference to review excluded monitoring data / indicators / targets during the lifetime of the Plan and take account of and incorporate relevant information as it becomes available.

Consideration should be given to the following:

- The addition of appropriate corrective action thresholds for unauthorised development, illegal waste activity and water pollution incidents not involving oil spills.
- The inclusion of monitoring frequencies.
- Monitoring of both positive and negative effects, where they occur.
- Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly defined.

The Monitoring Programme should be flexible to take account of the various stages of the Plan and should be able to deal with specific environmental issues as they arise. The programme must be able to deal with the possibility of cumulative effects. Proposed Plan implementation monitoring should be linked with the proposed SEA related environmental monitoring.

The Monitoring Programme should include information on how the monitoring proposed will allow unforeseen adverse effects to be identified and responded to as appropriate. Who has responsibility for this? What will trigger appropriate remedial action?

Leonora Earls

From: Sara Byrne [sara.byrne1@esb.ie]
Sent: 21 October 2010 16:26
To: Arklow Development Plan
Subject: Submission to Draft Arklow & Environs Plan 2011-2017
Importance: High

SCANNED

To whom it may concern,

Please find attached submission to the Submission to Draft Arklow & Environs Plan 2011-2017 on behalf of ESB.

I would be grateful if you could acknowledge receipt of this submission by return of email.

Regards,

Sara Byrne

Estates Management BSc (Surv) MIAVI
ESB, 27 Lower Fitzwilliam Street, Dublin 2, Ireland
Tel: +353(0)1 7026860

sara.byrne1@esb.ie

 Please don't print this email unless you really need to



Shared Services

Excellence in service solutions for ESB



Submission acknowledged
[Signature]



ESB Property

ESB Estates Management,
27 Lower Fitzwilliam Street,
Dublin 2,
Ireland.

Castle Park, Arklow

SCALE

REVISED BY	DESIGNED BY	Revisions:	By	Date	1:1000
MADE BY	DATE				INDEX NO.
EMN	16/09/10				2173

© Reproduced by permission of Ordnance Survey Ireland Licence Number E11/0020708-13

DRAFT ARKLOW TOWN AND ENVIRONS PLAN 2011-2017



**SUBMISSION BY ELECTRICITY SUPPLY BOARD
WITH REGARD TO THE ESB PROPERTY,
CASTLE PARK, ARKLOW**

OCTOBER 2010

Town Clerk
Arklow Town Council
Avoca River House
North Quay
Arklow

By email: arklowplanreview@arklowtc.ie

21st October 2010

RE: DRAFT ARKLOW AND ENVIRONS DEVELOPMENT PLAN 2011 - 2017

To whom it may concern,

Electricity Supply Board (ESB) welcomes the publication of the Draft Arklow and Environs Development Plan 2011-2017, and wishes to take the opportunity to make a submission at this stage in the review process in relation to its Operations Centre at Castle Park, Arklow.

Site Description

ESB owns and operates its local operations centre from its property at Castle Park. The property as identified on the attached map is located to the rear of the main street in Arklow town centre. The site comprises approximately 0.28 hectares and there is currently a single storey commercial building on the site incorporating ground floor offices and stores and yard to the rear. A new bulk lock-up and quad stores building were recently added to the facility.

There are approximately 15 Networks staff operating from this location including local networks managers, supervisors, clerical officers and engineering officers. The centre supports Engineering Design, Construction Operations, Customer Service and Fault Response activities. The offices are open to the general public between normal office hours, usually by appointment. This division serves 44,346 customers from this centre within a fifty mile radius including North Wexford, West Wicklow, East Carlow and Newtownmountkennedy in North Wicklow.

ESB has an obligation, under licence from the Commission of Energy Regulation (CER), to respond to all faults within one hour. To meet response timelines ESB requires speedy access to the engineering centre for tools and equipment and to an uncongested road infrastructure to the fault location. The Castle Park site is extremely suited to its purpose, with good access to the town's population and easy connections to the wider rural hinterland.

ESB has occupied the premises for nearly 30 years and, given the long term requirement for an Operations Centre, ESB intends to continue to use the existing facility for the foreseeable future, and future needs may entail extension of its facilities. It is critical that the site is safeguarded in order to meet current operational needs and possible future expansion.

Zoning Issues

In the existing Arklow Town Development Plan 2005-2011 the Castle Park facility is zoned for CE-Community/Educational/Institutional: *To provide for and improve community, educational and institutional facilities.*

It is recognised that the Draft Arklow Town and Environs Plan has attempted to rationalise the zoning pattern across the town centre, including retaining the existing CE zoning on the ESB site. It has been previously stated that ESB intends to use the existing facility for the foreseeable future. However should ESB choose to relocate a CE zoning would restrict future land uses permissible on such a strategic site.

While it is accepted that the CE zoning matrix permits a number of uses it does not support the mix of uses that are currently carried out at the ESB facility nor does it provide flexibility for future development requirements.

It is our opinion that a 'Town Centre' zoning is the most appropriate for the subject site. which would also facilitate the delivery of some of the core strategies as outlined in Chapter 2 of the written statement:

2.4 Key strategic objectives

- *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 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.*

Conclusion

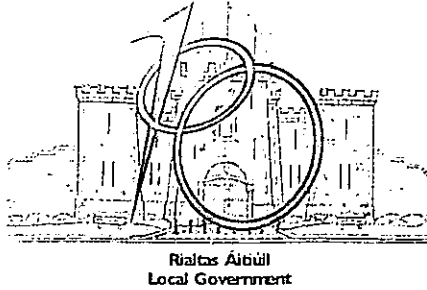
ESB considers that the existing zoning of its property at Castle Park is inconsistent with its ongoing activities and undermines the long-term plans to maintain its facility on the site.

ESB requests that the zoning of the site be amended to 'Town Centre'. The ESB depot clearly falls within the meaning of the 'Town Centre' zoning. This is a fair and equitable zoning for the site which is more compatible with its existing use and potential.

We trust that this submission will play a valuable part in realising a successful and thriving Town. We look forward to continuing discussions and the opportunity to contribute to the growth and sustainable development of Arklow and its Environs.

Yours sincerely,

Colm Brophy,
Estates Manager
Shared Services



Comhainle Chontae
Loch Garman

Wexford County Council
County Hall
Wexford

tel 053 9176500
Fax 053 9143406
email postmaster@wexfordcoco.ie

Town Clerk,
Arklow Town Council,
Avoca River House,
North Quay,
Arklow

26th October 2010

Re: Draft Arklow Town and Environs Development Plan 2011-2017

A chara,

I wish to acknowledge receipt of the Draft Arklow Town and Environs Development Plan 2011-2017.

Wexford County Council welcomes the well structured, comprehensive and integrated Draft Development Plan for Arklow Town and its Environs.

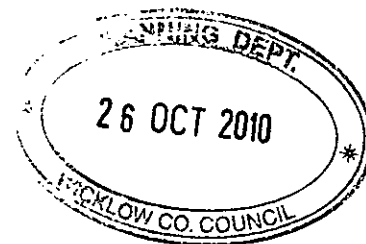
Having reviewed its content, it is considered that cross-boundary issues including transportation, wind energy and landscape/visual amenity have been satisfactorily addressed in the Draft Plan.

Any planning applications for wind energy developments in the vicinity of the Wexford border shall have regard to the County Wexford Wind Strategy.

Wexford County Council looks forward to continuing co-operation with Arklow Town Council and Wicklow County Council in the sustainable development of the Arklow and its Environs.

Is mise le meas,


Pauline Doyle
Senior Executive Planner





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 21 October, 2010

Ár dTag. | Our Ref. NRA10-79696

Bhur dTag. | Your Ref.

Re: Draft Arklow Town and Environs Development Plan, 2011 - 2017

Dear Sir/Madam,

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

Subsequent to the Authority's initial submission on the Arklow Town Development Plan Review and the preparation of the Draft Arklow Town and Environs Development Plan, 2011 – 2017, the Department of the Environment, Heritage and Local Government has published the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.

On launching the Guidelines for public consultation the Ministerial press statement advised that pending finalisation of the guidelines, local authorities are requested to have regard to the recommended approach in the draft guidelines when preparing or varying development plans and local area plans, and in regard to applications for planning permission.

The Draft Guidelines include a recommended content for development plans, box 2.3, section 2.3 refers. It is stated, inter alia, that plans should include policies and objectives to achieve Governments overarching transport policy, as set out in Smarter Travel: A New Transport Policy for Ireland 2009 – 2020, including the need to, inter alia, protect the efficiency, capacity and safety of national roads.

It is noted that the Draft Plan does not make reference to the Spatial Planning & National Roads (Draft) Guidelines for Planning Authorities. It is recommended that the Council should have regard to the provisions of the Spatial Planning and National Roads (Draft) Guidelines in preparing the Arklow Town and Environs Development Plan, 2011 – 2017, prior to adoption.

Development Strategy and National Roads;

In recognition of the designation of Arklow as a large growth town (II) in the Regional Planning Guidelines Greater Dublin Area 2010 – 2022 and a Large Growth Town (2) in the current Wicklow County Development Plan, 2010 - 2016, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development been framed within a coherent integrated land use and transportation strategy.

As an integral element of a coherent integrated land use and transportation strategy, the Authority attaches particular importance to the network of national roads continuing to play the intended strategic role in catering for inter-urban and inter-regional transport requirements.

The Authority, therefore, seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Arklow and its environs and County

Wicklow is protected and that this would be a key element of land use and transport policy in the Plan.

SPECIFIC POLICIES & OBJECTIVES

Protection of Existing National Routes

National and Regional Road Development Control Objectives are outlined in Section 5.8.3, the Authority notes the inclusion of the statement advising that no development shall be permitted that would involve direct access to or from a motorway. It is also noted that it is stated that 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. While the Authority welcomes the inclusion of both statements, it is the opinion of the Authority that the latter statement would benefit from clarification insofar as it should be included that a replacement access is dependent on no additional development or intensification of use resulting, in accordance with the provisions of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.

In addition to the frequency of access points to the national road network, the traffic carrying capacity of these roads, the level of service they deliver and the period over which they continue to perform efficiently will be determined by a range of other factors, including traffic growth, the extent of development adjoining national roads, including interchanges, and in the environs of such roads, as well as, the traffic volumes generated by development.

Although the Draft Plan identifies objectives in relation to public transport enhancements and cycling and walking, Sections 5.2 and 5.3 refer, it is noted that Section 2.3.4 indicates that there is likely to be continuing car dependency to access the metropolitan region in the short to medium term.

It is also noted that the Managers Report on submissions received in relation to the consultation on the preparation of the Arklow Town & Environs Development Plan advises that *'it should be recognised that Arklow is designated a growth town in the Regional Planning Guidelines for the Greater Dublin Area and is targeted to grow significantly over the next 10-15 years. In this context, it may not always be possible to prevent the use of national networks by traffic generated from local developments; however, the plan will include those road objectives required to move traffic around the settlement without use of the N11/M11'*.

While the Authority welcomes the acknowledgement of the adverse implications associated with a reliance on the national road network by local traffic, it is recommended that this reliance on the national road network is mitigated by the development of integrated land use and transport policies.

Having particular regard to the extent and location of zoned lands adjoining the M11, in particular, the north and south junctions on the M11, it is not clear to the Authority that this has been achieved in the Draft Plan and the Authority is concerned that the effect of such development policies may impact adversely on the traffic carrying capacity of the national road network, the levels of service delivered and the period over which they continue to perform efficiently.

The recently published Spatial Planning and National Roads (Draft) Guidelines advise that because the majority of road journeys are over short distances, plans should also ensure that the general pattern of development seeks to minimise local trip generation by encouraging integrated development and that subsequently such local trips are primarily catered for by routes and modes other than the national roads network. Plans should especially seek to avoid the creation of development patterns that would lead to local trip generation on national routes.

The Authority highlighted in an initial submission to the Council on the preparation of the Arklow Town & Environs Development Plan (December, 2009) that it will be necessary to exercise particular care in the assessment and management of development proposals relating to the zoning of locations at or close to junctions on the M11 where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the

national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

In this regard the Authority identified the existing zoning designations at Killiniskyduff at the northern M11 junction and within the townlands of Kish, Cooladangan, Ballynattin, etc. adjacent to the southern junction on the M11 within the environs area of Arklow Town as areas where particular care should be exercised.

In response to the Authority's observations, the Managers Report on submissions received in relation to the consultation on the preparation of the Arklow Town & Environs Development Plan outlined that *'significant tracks of land adjacent to the N11/M11 and associated junctions have already been zoned for development in the County Development Plans of 1999 and 2004 and these zoning have been carried forward into the current Arklow environs LAP 2006. However, in the crafting of the new draft plan, all existing zonings will be reviewed with regard to their necessity and appropriateness, considering, among other factors, issues relating to traffic safety and ensuring the role of the N11 / M11 is not compromised'*.

The Authority would welcome referral of the review undertaken in relation to the lands zoned at the M11 north and south junctions. Pending receipt of this review, the Authority maintains its concern in relation to the zoning objectives carried forward into the Draft Plan and the comments outlined in the submission made on the preparation of the Draft Plan pertain, particularly in relation to the requirement to undertake appropriate strategic transport assessment of the lands concerned to determine impact on the national road network and to identify enhancements and improvements required to local transport infrastructure to mitigate this impact; an approach advocated by the recently published Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities. Please find a copy of the Authority's submission of December, 2009, attached.

National Road Schemes/Schemes in Planning

It is noted that Section 5.5 of the Draft Plan includes an objective to facilitate the Arklow – Rathnew Scheme, however, it is noted that a number of additional works objectives for the N11 are also scheduled in the Draft Plan.

The Authority supports the inclusion of the objective referring to the Rathnew to Arklow North upgrade, comprising the upgrading of the existing single carriageway route to dual carriageway/motorway standard (objective NR1 refers).

The Council will be aware that the implementation of all national road schemes is subject to budgetary and funding constraints.

The Authority also notes the inclusion of an objective to provide a third interchange on the Arklow Bypass at Lamberton, objective NR2 refers. As previously advised in relation to the provision of a similar objective in the Draft Wicklow County Development Plan, 2011 – 2017, the Council will be aware that such a proposal is not scheduled in the Authority's programme of work in accordance with NDP 2007 – 2013 and Transport 21 objectives and is not an NRA priority. In view of the designation of this section of the N11 to the M11, the Authority advises that a Motorway Order is required for the development of a new junction and the Authority wishes to advise that it would not be supportive of proposals for a motorway junction at this location.

Action Area Plans

The Authority welcomes consultation on the preparation of Action Area Plans as outlined in section 10.1 of the Draft Plan and other framework plans that may be undertaken for the extensive lands zoned in proximity to the M11 junctions.

Signage

While the Authority welcomes the inclusion of policy in relation to signage, it is recommended that the signage policy in relation to national routes should be in accordance with the Authority's

'Policy on the provision of Tourist and Leisure Signage on National Roads' without modification in the interests of safety on the national road network and to avoid distraction of drivers.

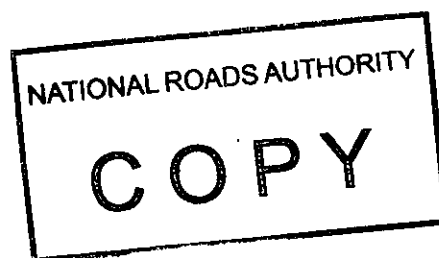
It is requested that the foregoing comments and observations are taken into consideration in the preparation and adoption of the Arklow Town and Environs Development Plan, 2011 – 2017.

Yours sincerely



Michael McCormack
Policy Adviser (Planning)

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



17th December 2009

NRA09-75874

Re: Preparation of the Arklow Town and Environs Development Plan, 2011 - 2017

Dear Sir/Madam,

The Authority's primary function, under the Roads Act 1993, is 'to secure the provision of a safe and efficient network of national roads'. For this purpose, it has overall responsibility for planning and supervision of construction and maintenance works on these roads.

National roads play a key role in providing access to all regions of the country and connections between the main centres of population. Although national roads account for less than 6% of the total length of public roads throughout the country, their significance in serving our economic and social transport needs is reflected in the fact that they carry over 40% of all road traffic in Ireland and approximately 98% of our freight traffic.

The Authority attaches particular importance to the network of national roads continuing to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic competitiveness by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

The Authority welcomes consultation on the preparation of the Arklow Town & Environs Development Plan, 2011 – 2017; in making the following observations, the Authority is guided by the Authority's '*Policy Statement on Development Management and Access to National Roads*', and respectively requests the following be considered;

DEVELOPMENT STRATEGY

In recognition of the designation of Arklow as a large growth town (II) in the Regional Planning Guidelines Greater Dublin Area 2004 – 2016 and a Large Growth Town in the current Wicklow County Development Plan, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development been framed within a coherent integrated land use and transportation strategy.

The Authority seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Arklow and its environs and County Wicklow is protected.

There has been and continues to be significant investment in the development of National Routes in County Wicklow. To date, the Exchequer has invested over €400 million in major road schemes and improvements in County Wicklow 1997 – 2008, including the N11 Arklow Bypass, opened in 1999.

The traffic carrying capacity of these roads, the level of service they deliver and the period over which they continue to perform efficiently will be determined by a range of factors in addition to traffic growth, in particular:

- The frequency of access points to the network,
- The extent of development adjoining national roads, including interchanges, and in the environs of such roads, as well as,
- The traffic volumes generated by development.

In retaining the safety, efficiency and capacity of the National Roads Network, the Development Plan should make reference to the guidance indicated in the National Roads Authority "*Policy Statement on Development Management and Access to National Roads*" (May 2006) (available at www.nra.ie) which amends and builds on the principles of earlier circulars "Development Control Advice and Guidelines" (1982) and "Policy and Planning Framework for Roads" (1985). Part 2 of the document indicates national policy in respect to provision of access to National Roads; the Authority requests that the Council reflect this guidance.

In addition, the Council's attention is drawn to both requirements outlined in the Retail Planning Guidelines, in particular paragraphs 26, 65 and 84, and the Sustainable Rural Housing Guidelines, paragraph 3.3.4, which collectively indicates the importance of the protection of the national roads network.

NATIONAL ROAD PROJECTS

As you are aware the National Roads Authority is currently developing schemes within County Wicklow, details of the schemes that should be incorporated into the review of the Arklow and Environs Development Plan are as follows:

□ N11 Arklow/Rathnew Scheme

The Council is advised that issues emerging from future schemes should be considered during the drafting of the Development Plan. It is proposed that the N11 Arklow/Rathnew Scheme will tie into the existing M11 (Arklow Bypass) north of the Arklow Environs Plan Boundary.

Planning authority policies and objectives, including rezoning of lands, should not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes have been identified and brought to the attention of the planning authority. Similarly, development strategies or rezoning proposals should not have the effect of altering the function of these routes or importantly, increase the cost of land to be acquired or under active consideration as a route option for a national road scheme. Such proposals, while potentially bringing major financial gains to the property owners involved, would be at variance with the broader public interest and would, by significantly increasing the cost of the land to be acquired for road schemes, reduce the funding available to the Authority for road construction and improvement work generally.

The Council will be aware of the designation of the N11 to M11, motorway status, at Arklow since the adoption of the previous Arklow Town Development Plan and Arklow Environs Local Area Plan, accordingly, reference to the motorway/national route in the Plan should reflect this.

GENERAL DEVELOPMENT POLICY

In association with the development strategy, it is important that policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, by measures intended to cater for the needs of local traffic and local development related traffic, which should more appropriately be addressed within the framework of providing an adequate local transport infrastructure as advocated in guidelines given in the DoEHLG/DoT/DTO publication "Traffic Management Guidelines" and also the National Spatial Strategy.

The sustainable integration of land use and transportation needs to continue to be a strategic principle in the draft local area plan, not only in the transportation section but also as a principle that feeds through the social, economic and especially more local area policies and objectives and a clear cross referencing of policies in this regard is requested through the relevant sections of the Plan.

The Authority recommends that all development objectives and especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by sustainable transport, foot, cycling, and private car so that areas can be easily accessible by all modes of transport and all sections of society.

JUNCTIONS

It will be necessary for the planning authorities to exercise particular care in their assessment and management of development proposals in the Arklow & Environs Development Plan relating to the zoning of locations at or close to junctions on the M11 where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

The Authority notes the existing zoning designations at Killinskyduff at the northern M11 junction and within the townlands of Kish, Cooladangan, Ballynattin, etc. adjacent to the southern junction on the M11 within the environs area of Arklow Town. It is noted that the zoning objectives included in the existing Arklow Environs Local Area Plan, 2006 – 2012, provided for various designated land uses to extend for the option of the life of the Plan. The Authority recommends that the Council review such zoning objectives, where permissions for development have not yet been granted, in the context of preparing a development strategy that seeks to safeguard the on going operation of the relevant junctions.

In this regard, development plan policies should reflect and safeguard the strategic role of junctions in catering for the safe and efficient movement of inter-urban and interregional traffic. Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres. In particular, policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, including junctions, by measures intended to cater for the needs of local traffic which should more appropriately be addressed within the framework of providing an adequate local road infrastructure.

It should be noted that whilst the Authority recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessment of areas to individual applicants' transport assessments is considered highly inappropriate and would lead to a piecemeal and unsustainable approach to development in the vicinity of the strategic national road network.

Thus, appropriate Strategic Transport Assessment (STA) should be undertaken in the preparation of the development plan to determine the capacity of the local road network, the interface with the M11 and associated junctions and the impact of the extent of development envisaged in the plan area on the operational efficiency and capacity of the national route. The Authority also advises that the cumulative impacts of any proposed developments in the area need to be considered.

The location and capacity of junctions on national roads are determined during the road planning process having regard to a range of factors and taking account, in particular, of anticipated inter-urban and inter-regional traffic volumes over a design horizon of at least 20 years. A key objective of the approach to road planning is to achieve a satisfactory level of service for road users and to protect and maintain that service over the design period applying to the mainline road and associated interchanges. In these circumstances, it will be necessary for planning authorities to exercise particular care in their assessment and management of development proposals that impact on the operation, safety and efficiency of the national road network and associated junctions.

The Authority notes the inclusion in the existing Arklow Environs Local Area Plan of the objective to provide a third junction on the N11 at Lamberton. The Council will be aware that such a proposal is not scheduled in the Authority's programme of work in accordance with NDP 2007 – 2013 and Transport 21 objectives and is not an NRA priority. In view of the designation of this section of the N11 to the M11, the Authority advises that a Motorway Order is required for the development of a new junction and the Authority wishes to advise that it would not be supportive of proposals for a motorway junction at this location.

SPECIFIC POLICIES AND OBJECTIVES

Traffic and Transport Assessment Guidelines (TTA) and Road Safety Audits

The Authority recommends that planning applications for significant development proposals should be accompanied with a Transport and Traffic Assessment and Road Safety Audits to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring developments on the road network. Guidance is given in this respect in the DoELG/DoT/DTO publication "Traffic Management Guidelines" and "NRA Design Manual for Roads and Bridges:(HD 19/09 Road Safety Audit). This issue needs to be highlighted as a prerequisite in the text.

To assist with the aforementioned, the Authority has prepared Traffic and Transport Assessment Guidelines (TTA), which are available at www.nra.ie. The Guidelines seek to promote best practice for the preparation of Traffic and Transport Assessments and explain the relevance of TTA in the planning process. In particular, the document is intended to provide guidance for developers, their agents, as well as local authorities and the National Roads Authority, in the scoping, conducting and evaluating of traffic and transport assessments for proposed developments. The Guidelines will be updated over time in light of experience as practice evolves regarding the integration of transportation and land use planning.

Noise

The Council is also advised to refer to the requirements of S.I. No. 140 Of 2006 Environmental Noise Regulations in the Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

CONCLUSION

In summary, the Authority respectfully requests that the review of the Arklow Town Development Plan and Arklow Environs Local Area Plan ensures;

1. that the protection of the safety, carrying capacity and efficiency of the existing and future national road network is maintained, and
2. an integrated approach to land use and transportation solutions throughout the development plan area should be undertaken, such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network.

It is requested that the foregoing comments and observations are taken into consideration in the preparation and adoption of the Arklow Town and Environs Development Plan, 2011 – 2017.

Yours sincerely

Michael McCormack
Policy Adviser (Planning)

Leonora Earls

From: Michael McCormack [mmccormack@nra.ie]
Sent: 22 October 2010 12:35
To: Arklow Development Plan
Subject: Draft Arklow Town & Environs Development Plan, 2011 - 2017

Please find attached a copy of the Authority's observations in relation to the Draft Arklow Town and Environs Development Plan, 2011 – 2017.

A hard copy has also issued by post.

Please acknowledge receipt of the Authority's submission.

Regards
Michael McCormack
Policy Advisor (Planning)

.....
NRA E-mail system: This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.
This footnote also confirms that this email message has been swept by MIMESweeper for the presence of computer viruses.
www.clearswift.com
.....





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 21 October, 2010

Ár dTag. | Our Ref. NRA10-79696

Bhur dTag. | Your Ref.

Re: Draft Arklow Town and Environs Development Plan, 2011 - 2017

Dear Sir/Madam,

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

Subsequent to the Authority's initial submission on the Arklow Town Development Plan Review and the preparation of the Draft Arklow Town and Environs Development Plan, 2011 – 2017, the Department of the Environment, Heritage and Local Government has published the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.

On launching the Guidelines for public consultation the Ministerial press statement advised that pending finalisation of the guidelines, local authorities are requested to have regard to the recommended approach in the draft guidelines when preparing or varying development plans and local area plans, and in regard to applications for planning permission.

The Draft Guidelines include a recommended content for development plans, box 2.3, section 2.3 refers. It is stated, inter alia, that plans should include policies and objectives to achieve Governments overarching transport policy, as set out in Smarter Travel: A New Transport Policy for Ireland 2009 – 2020, including the need to, inter alia, protect the efficiency, capacity and safety of national roads.

It is noted that the Draft Plan does not make reference to the Spatial Planning & National Roads (Draft) Guidelines for Planning Authorities. It is recommended that the Council should have regard to the provisions of the Spatial Planning and National Roads (Draft) Guidelines in preparing the Arklow Town and Environs Development Plan, 2011 – 2017, prior to adoption.

Development Strategy and National Roads;

In recognition of the designation of Arklow as a large growth town (II) in the Regional Planning Guidelines Greater Dublin Area 2010 – 2022 and a Large Growth Town (2) in the current Wicklow County Development Plan, 2010 - 2016, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development been framed within a coherent integrated land use and transportation strategy.

As an integral element of a coherent integrated land use and transportation strategy, the Authority attaches particular importance to the network of national roads continuing to play the intended strategic role in catering for inter-urban and inter-regional transport requirements.

The Authority, therefore, seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Arklow and its environs and County

Wicklow is protected and that this would be a key element of land use and transport policy in the Plan.

SPECIFIC POLICIES & OBJECTIVES

Protection of Existing National Routes

National and Regional Road Development Control Objectives are outlined in Section 5.8.3, the Authority notes the inclusion of the statement advising that no development shall be permitted that would involve direct access to or from a motorway. It is also noted that it is stated that 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. While the Authority welcomes the inclusion of both statements, it is the opinion of the Authority that the latter statement would benefit from clarification insofar as it should be included that a replacement access is dependent on no additional development or intensification of use resulting, in accordance with the provisions of the Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities.

In addition to the frequency of access points to the national road network, the traffic carrying capacity of these roads, the level of service they deliver and the period over which they continue to perform efficiently will be determined by a range of other factors, including traffic growth, the extent of development adjoining national roads, including interchanges, and in the environs of such roads, as well as, the traffic volumes generated by development.

Although the Draft Plan identifies objectives in relation to public transport enhancements and cycling and walking, Sections 5.2 and 5.3 refer, it is noted that Section 2.3.4 indicates that there is likely to be continuing car dependency to access the metropolitan region in the short to medium term.

It is also noted that the Managers Report on submissions received in relation to the consultation on the preparation of the Arklow Town & Environs Development Plan advises that *'it should be recognised that Arklow is designated a growth town in the Regional Planning Guidelines for the Greater Dublin Area and is targeted to grow significantly over the next 10-15 years. In this context, it may not always be possible to prevent the use of national networks by traffic generated from local developments; however, the plan will include those road objectives required to move traffic around the settlement without use of the N11/M11'*.

While the Authority welcomes the acknowledgement of the adverse implications associated with a reliance on the national road network by local traffic, it is recommended that this reliance on the national road network is mitigated by the development of integrated land use and transport policies.

Having particular regard to the extent and location of zoned lands adjoining the M11, in particular, the north and south junctions on the M11, it is not clear to the Authority that this has been achieved in the Draft Plan and the Authority is concerned that the effect of such development policies may impact adversely on the traffic carrying capacity of the national road network, the levels of service delivered and the period over which they continue to perform efficiently.

The recently published Spatial Planning and National Roads (Draft) Guidelines advise that because the majority of road journeys are over short distances, plans should also ensure that the general pattern of development seeks to minimise local trip generation by encouraging integrated development and that subsequently such local trips are primarily catered for by routes and modes other than the national roads network. Plans should especially seek to avoid the creation of development patterns that would lead to local trip generation on national routes.

The Authority highlighted in an initial submission to the Council on the preparation of the Arklow Town & Environs Development Plan (December, 2009) that it will be necessary to exercise particular care in the assessment and management of development proposals relating to the zoning of locations at or close to junctions on the M11 where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the

national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

In this regard the Authority identified the existing zoning designations at Killiniskyduff at the northern M11 junction and within the townlands of Kish, Cooladangan, Ballynattin, etc. adjacent to the southern junction on the M11 within the environs area of Arklow Town as areas where particular care should be exercised.

In response to the Authority's observations, the Managers Report on submissions received in relation to the consultation on the preparation of the Arklow Town & Environs Development Plan outlined that *'significant tracks of land adjacent to the N11/M11 and associated junctions have already been zoned for development in the County Development Plans of 1999 and 2004 and these zoning have been carried forward into the current Arklow environs LAP 2006. However, in the crafting of the new draft plan, all existing zonings will be reviewed with regard to their necessity and appropriateness, considering, among other factors, issues relating to traffic safety and ensuring the role of the N11 / M11 is not compromised'*.

The Authority would welcome referral of the review undertaken in relation to the lands zoned at the M11 north and south junctions. Pending receipt of this review, the Authority maintains its concern in relation to the zoning objectives carried forward into the Draft Plan and the comments outlined in the submission made on the preparation of the Draft Plan pertain, particularly in relation to the requirement to undertake appropriate strategic transport assessment of the lands concerned to determine impact on the national road network and to identify enhancements and improvements required to local transport infrastructure to mitigate this impact; an approach advocated by the recently published Spatial Planning and National Roads (Draft) Guidelines for Planning Authorities. Please find a copy of the Authority's submission of December, 2009, attached.

National Road Schemes/Schemes in Planning

It is noted that Section 5.5 of the Draft Plan includes an objective to facilitate the Arklow – Rathnew Scheme, however, it is noted that a number of additional works objectives for the N11 are also scheduled in the Draft Plan.

The Authority supports the inclusion of the objective referring to the Rathnew to Arklow North upgrade, comprising the upgrading of the existing single carriageway route to dual carriageway/motorway standard (objective NR1 refers).

The Council will be aware that the implementation of all national road schemes is subject to budgetary and funding constraints.

The Authority also notes the inclusion of an objective to provide a third interchange on the Arklow Bypass at Lamberton, objective NR2 refers. As previously advised in relation to the provision of a similar objective in the Draft Wicklow County Development Plan, 2011 – 2017, the Council will be aware that such a proposal is not scheduled in the Authority's programme of work in accordance with NDP 2007 – 2013 and Transport 21 objectives and is not an NRA priority. In view of the designation of this section of the N11 to the M11, the Authority advises that a Motorway Order is required for the development of a new junction and the Authority wishes to advise that it would not be supportive of proposals for a motorway junction at this location.

Action Area Plans

The Authority welcomes consultation on the preparation of Action Area Plans as outlined in section 10.1 of the Draft Plan and other framework plans that may be undertaken for the extensive lands zoned in proximity to the M11 junctions.

Signage

While the Authority welcomes the inclusion of policy in relation to signage, it is recommended that the signage policy in relation to national routes should be in accordance with the Authority's

'Policy on the provision of Tourist and Leisure Signage on National Roads' without modification in the interests of safety on the national road network and to avoid distraction of drivers.

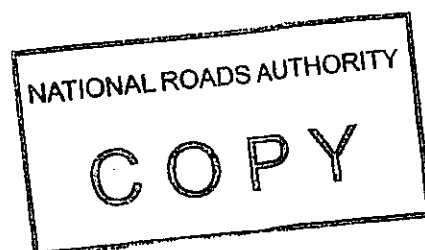
It is requested that the foregoing comments and observations are taken into consideration in the preparation and adoption of the Arklow Town and Environs Development Plan, 2011 – 2017.

Yours sincerely



Michael McCormack
Policy Adviser (Planning)

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



17th December 2009

NRA09-75874

Re: Preparation of the Arklow Town and Environs Development Plan, 2011 - 2017

Dear Sir/Madam,

The Authority's primary function, under the Roads Act 1993, is 'to secure the provision of a safe and efficient network of national roads'. For this purpose, it has overall responsibility for planning and supervision of construction and maintenance works on these roads.

National roads play a key role in providing access to all regions of the country and connections between the main centres of population. Although national roads account for less than 6% of the total length of public roads throughout the country, their significance in serving our economic and social transport needs is reflected in the fact that they carry over 40% of all road traffic in Ireland and approximately 98% of our freight traffic.

The Authority attaches particular importance to the network of national roads continuing to play the intended strategic role in catering for inter-urban and inter-regional transport requirements that will serve Ireland's economic competitiveness by providing faster, more efficient and safer access to and from our major ports, airports, cities and large towns.

The Authority welcomes consultation on the preparation of the Arklow Town & Environs Development Plan, 2011 – 2017; in making the following observations, the Authority is guided by the Authority's '*Policy Statement on Development Management and Access to National Roads*', and respectively requests the following be considered;

DEVELOPMENT STRATEGY

In recognition of the designation of Arklow as a large growth town (II) in the Regional Planning Guidelines Greater Dublin Area 2004 – 2016 and a Large Growth Town in the current Wicklow County Development Plan, the Authority supports practices aimed at concentrating development in established urban areas and designated development centres subject to development been framed within a coherent integrated land use and transportation strategy.

The Authority seeks to ensure that the carrying capacity, operational efficiency, safety and significant national investment made in national roads in Arklow and its environs and County Wicklow is protected.

There has been and continues to be significant investment in the development of National Routes in County Wicklow. To date, the Exchequer has invested over €400 million in major road schemes and improvements in County Wicklow 1997 – 2008, including the N11 Arklow Bypass, opened in 1999.

The traffic carrying capacity of these roads, the level of service they deliver and the period over which they continue to perform efficiently will be determined by a range of factors in addition to traffic growth, in particular:

- The frequency of access points to the network,
- The extent of development adjoining national roads, including interchanges, and in the environs of such roads, as well as,
- The traffic volumes generated by development.

In retaining the safety, efficiency and capacity of the National Roads Network, the Development Plan should make reference to the guidance indicated in the National Roads Authority "*Policy Statement on Development Management and Access to National Roads*" (May 2006) (available at www.nra.ie) which amends and builds on the principles of earlier circulars "*Development Control Advice and Guidelines*" (1982) and "*Policy and Planning Framework for Roads*" (1985). Part 2 of the document indicates national policy in respect to provision of access to National Roads; the Authority requests that the Council reflect this guidance.

In addition, the Council's attention is drawn to both requirements outlined in the Retail Planning Guidelines, in particular paragraphs 26, 65 and 84, and the Sustainable Rural Housing Guidelines, paragraph 3.3.4, which collectively indicates the importance of the protection of the national roads network.

NATIONAL ROAD PROJECTS

As you are aware the National Roads Authority is currently developing schemes within County Wicklow, details of the schemes that should be incorporated into the review of the Arklow and Environs Development Plan are as follows:

□ N11 Arklow/Rathnew Scheme

The Council is advised that issues emerging from future schemes should be considered during the drafting of the Development Plan. It is proposed that the N11 Arklow/Rathnew Scheme will tie into the existing M11 (Arklow Bypass) north of the Arklow Environs Plan Boundary.

Planning authority policies and objectives, including rezoning of lands, should not compromise the road planning and route option evaluation process in circumstances where road scheme planning is underway and potential routes have been identified and brought to the attention of the planning authority. Similarly, development strategies or rezoning proposals should not have the effect of altering the function of these routes or importantly, increase the cost of land to be acquired or under active consideration as a route option for a national road scheme. Such proposals, while potentially bringing major financial gains to the property owners involved, would be at variance with the broader public interest and would, by significantly increasing the cost of the land to be acquired for road schemes, reduce the funding available to the Authority for road construction and improvement work generally.

The Council will be aware of the designation of the N11 to M11, motorway status, at Arklow since the adoption of the previous Arklow Town Development Plan and Arklow Environs Local Area Plan, accordingly, reference to the motorway/national route in the Plan should reflect this.

GENERAL DEVELOPMENT POLICY

In association with the development strategy, it is important that policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, by measures intended to cater for the needs of local traffic and local development related traffic, which should more appropriately be addressed within the framework of providing an adequate local transport infrastructure as advocated in guidelines given in the DoEHLG/DoT/DTO publication "*Traffic Management Guidelines*" and also the National Spatial Strategy.

The sustainable integration of land use and transportation needs to continue to be a strategic principle in the draft local area plan, not only in the transportation section but also as a principle that feeds through the social, economic and especially more local area policies and objectives and a clear cross referencing of policies in this regard is requested through the relevant sections of the Plan.

The Authority recommends that all development objectives and especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design. An integrated approach to the design of development areas should include a set of principles and criteria designed to ensure a high standard of access by sustainable transport, foot, cycling, and private car so that areas can be easily accessible by all modes of transport and all sections of society.

JUNCTIONS

It will be necessary for the planning authorities to exercise particular care in their assessment and management of development proposals in the Arklow & Environs Development Plan relating to the zoning of locations at or close to junctions on the M11 where such development could generate significant additional traffic, thereby potentially compromising the capacity and efficiency of the national road/associated junctions and possibly leading to the premature and unacceptable reduction in the level of service available to road users.

The Authority notes the existing zoning designations at Killinskyduff at the northern M11 junction and within the townlands of Kish, Cooladangan, Ballynattin, etc. adjacent to the southern junction on the M11 within the environs area of Arklow Town. It is noted that the zoning objectives included in the existing Arklow Environs Local Area Plan, 2006 – 2012, provided for various designated land uses to extend for the option of the life of the Plan. The Authority recommends that the Council review such zoning objectives, where permissions for development have not yet been granted, in the context of preparing a development strategy that seeks to safeguard the on going operation of the relevant junctions.

In this regard, development plan policies should reflect and safeguard the strategic role of junctions in catering for the safe and efficient movement of inter-urban and interregional traffic. Planning authorities, in considering proposals for zonings adjacent or close to existing or planned national roads/motorways and junctions, should give special attention to the preferences expressed in the Retail Planning Guidelines for locating developments that attract many trips within established towns and district centres. In particular, policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, including junctions, by measures intended to cater for the needs of local traffic which should more appropriately be addressed within the framework of providing an adequate local road infrastructure.

It should be noted that whilst the Authority recommends that traffic and transport assessments be carried out for individual planning applications as part of the development management process, this is not a substitute for a prior overall transport assessment of areas where the planning authority is determining fundamental issues of land use and transportation. Leaving the overall transport assessment of areas to individual applicants' transport assessments is considered highly inappropriate and would lead to a piecemeal and unsustainable approach to development in the vicinity of the strategic national road network.

Thus, appropriate Strategic Transport Assessment (STA) should be undertaken in the preparation of the development plan to determine the capacity of the local road network, the interface with the M11 and associated junctions and the impact of the extent of development envisaged in the plan area on the operational efficiency and capacity of the national route. The Authority also advises that the cumulative impacts of any proposed developments in the area need to be considered.

The location and capacity of junctions on national roads are determined during the road planning process having regard to a range of factors and taking account, in particular, of anticipated inter-urban and inter-regional traffic volumes over a design horizon of at least 20 years. A key objective of the approach to road planning is to achieve a satisfactory level of service for road users and to protect and maintain that service over the design period applying to the mainline road and associated interchanges. In these circumstances, it will be necessary for planning authorities to exercise particular care in their assessment and management of development proposals that impact on the operation, safety and efficiency of the national road network and associated junctions.

The Authority notes the inclusion in the existing Arklow Environs Local Area Plan of the objective to provide a third junction on the N11 at Lamberton. The Council will be aware that such a proposal is not scheduled in the Authority's programme of work in accordance with NDP 2007 – 2013 and Transport 21 objectives and is not an NRA priority. In view of the designation of this section of the N11 to the M11, the Authority advises that a Motorway Order is required for the development of a new junction and the Authority wishes to advise that it would not be supportive of proposals for a motorway junction at this location.

SPECIFIC POLICIES AND OBJECTIVES

Traffic and Transport Assessment Guidelines (TTA) and Road Safety Audits

The Authority recommends that planning applications for significant development proposals should be accompanied with a Transport and Traffic Assessment and Road Safety Audits to be carried out by suitably competent consultants, which are assessed in association with their cumulative impact with neighbouring developments on the road network. Guidance is given in this respect in the DoELG/DoT/DTO publication "Traffic Management Guidelines" and "NRA Design Manual for Roads and Bridges:(HD 19/09 Road Safety Audit). This issue needs to be highlighted as a prerequisite in the text.

To assist with the aforementioned, the Authority has prepared Traffic and Transport Assessment Guidelines (TTA), which are available at www.nra.ie. The Guidelines seek to promote best practice for the preparation of Traffic and Transport Assessments and explain the relevance of TTA in the planning process. In particular, the document is intended to provide guidance for developers, their agents, as well as local authorities and the National Roads Authority, in the scoping, conducting and evaluating of traffic and transport assessments for proposed developments. The Guidelines will be updated over time in light of experience as practice evolves regarding the integration of transportation and land use planning.

Noise

The Council is also advised to refer to the requirements of S.I. No. 140 Of 2006 Environmental Noise Regulations in the Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted. The costs of implementing mitigation measures shall be borne by the developer, as the Authority will not be responsible for the provision of additional noise mitigation.

CONCLUSION

In summary, the Authority respectfully requests that the review of the Arklow Town Development Plan and Arklow Environs Local Area Plan ensures;

1. that the protection of the safety, carrying capacity and efficiency of the existing and future national road network is maintained, and
2. an integrated approach to land use and transportation solutions throughout the development plan area should be undertaken, such that local traffic generated by developments is catered for primarily within the framework of the local (i.e. non-national) road network.

It is requested that the foregoing comments and observations are taken into consideration in the preparation and adoption of the Arklow Town and Environs Development Plan, 2011 – 2017.

Yours sincerely

Michael McCormack
Policy Adviser (Planning)

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

Date: 20-10-2010



Ref: Arklow Town & Environs Plan 2011-2017

Land at Dublin Road proposed for rezoning from "Natural Amenity" to "Existing Residential"

A Chara,

In relation to the above, I would like to make a submission on the new Arklow Town Development Plan 2011 – 2017.

I wish to outline my objection to the rezoning of a parcel of land on the Dublin Road that is proposed to be rezoned from its present land use of "Natural Amenity" to "Existing Residential". I have highlighted the relevant lands on attached Map No.11.01. (Appendix A) I am the owner of the property adjoining the subject lands to the north and I have serious reservations and concerns in relation to the proposed rezoning of this land as inappropriate development on land prone to flooding will increase the effects and extent of flooding to the surrounding area and is contrary to the proper planning and sustainable development.

In light of recent unprecedented flooding events across the country and the concerns raised by those affected, national, regional and local policies have been implemented to reduce development in flood prone areas and increase protection to existing developments. The Irish Independent quoted Environment Minister John Gormley stating " *Building in floodplains is not a good thing. And I think over the years we have ignored good planning advice, we have zoned in areas that should not have been zoned and those lessons have been learned.*" (Appendix B)

The Irish Times article dated 14th October 2009 quotes John O' Connor, the chairman of An Bord Pleanala as saying " *excessive and unsuitable zoning of land*" had been a contributor to the property bubble and the aftermath and that some development land may have to be "de-zoned" in order to return to realistic planning and development.

Mr O'Conner further states that "*now, more than ever, we need to embrace the principles of good planning and sustainable development in order to prevent further deterioration of our environment*" (Appendix B)

Why at a time when there is too much land zoned residential, existing residential developments are not being built or cannot be finished, is the council recommending natural amenity land that is prone to flooding and is part of the marsh floodplain be rezoned residential?

Site History

The land has been the subject of several planning applications in recent years all of which were refused or withdrawn due to the lands failure to meet current planning standards.

- P12/1997 – **Withdrawn**
- P85/2001 – **Refused** due to the land zoning and the site being part of the marsh floodplain
- P01/2006 – **Withdrawn**
- P130/2007 – **Refused** due to land zoning, the site being part of the marsh floodplain, issues over existing services traversing the site.
- P09/10, PL33.235725 – **Refused** due to risk of flooding.

The County Manager's opinion on the subject site after the first round of submissions on the Draft Development plan stated "*Preliminary analysis suggests that there is already adequate zoned residential land in the settlement and therefore it is unlikely that additional lands will be required for zoning*" And according to an Irish Independent article dated 10th October 2009, "*there is enough land zoned in Ireland to build homes for over 3 million extra people*" (Appendix B)

As a result, I wish to outline my opposition to the proposed re zoning of the portion of land and provide documentary evidence that shows the subject site should not be rezoned for development and left in its present land use.

Flooding.

The following policies' highlight the lands unsuitability for rezoning to "Existing Residential" and provides supporting evidence that it should not be permitted.

- The Department of Environment's Ministerial guidelines "The Planning system and Flood Risk Management" (November 2009).
- Draft Arklow Town Development Plan 20011 – 2017
- Background Issues paper for the Arklow Town & Local Environs Plan 2011 – 2017
- Arklow Flood Study Report by PH McCartney & Partners (2002)

The Department of Environment's Ministerial guidelines "The Planning system and Flood Risk Management" (November 2009).

Its core objectives are to:

- Avoid inappropriate development in areas at risk of flooding.
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface run-off.
- Ensure effective management of residual risks for development permitted in floodplains.
- Avoid unnecessary restriction of national, regional or local economic and social growth.
- Improve the understanding of flood risk among relevant stakeholders.
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

The DoEHLG overview of the guidelines state that *"Planning authorities will ensure that only development consistent with the overall policy and technical approaches of these guidelines should be approved and permission should be refused where flood issues have not been, or cannot be addressed successfully and where the presence of unacceptable residual flood risks to the development, its occupants or users and adjoining property remains"*

Under section 2.34, Floodplains it further states that *"areas of floodplain and wetlands should, therefore, be recognised and preserved to the extent possible as natural defences against flood risk. It is important to identify and where possible, safeguard areas of floodplain against development in both urban and rural areas."*

Recent Flooding to Arklow in January 2010, and in particular to the subject site and surrounding area resulted in the Ferrybank area access routes being cut off and having a detrimental impact on the local economy and residential amenity of the area. Please note that the cause of this flooding was not a result on the scale of a hurricane or persistent heavy rain but the melting of snow from the highlands. This highlights the sensitivity and vulnerability of flooding in the immediate area of the subject lands and is further evidence that the existing lands should be undeveloped.

Under Chapter 4, section 4.23, Flooding and Spatial planning of the guidelines, it highlights that planning authorities must be satisfied that it can clearly demonstrate on a solid evidence that the zoning or designation for development will satisfy the "Justification Test".

authorities should reconsider the zoning objective of the current or previous plan for any such lands where flood risk is assessed to be potentially significant and likely to increase in the future."

As the entire marsh acts as a flood storage basin for the Avoca River, the subject site and land opposite the Safeway garage (now Topaz) acts as a flood storage basin for the Ferrybank area. Flooding occurs when these two portions of land are totally saturated and overflow onto the road and surrounding properties. It should also be noted that the immediate land is the outfall for storm water for the entire Dublin Road. By reducing the flood plain of the immediate area at a particular location that is highly sensitive to flooding will only result in the area available for run off being reduced and result in aggravating flooding on adjoining roads and property.

The Planning System and Flood Risk Management Guidelines under section 4.24 proposes that Development plans should be pro active in addressing flooding by protecting, promoting and restoring floodplains.

It states,

"Planning Authorities should consider whether there are areas where a previous and natural flood risk management function can be restored through appropriate actions, such as managed re alignment of existing coastal defences or river or wetland restoration projects and the provision of flood storage. As well as restoring the flood risk management function, actions such as those above may provide opportunities to introduce green/open space within congested urban areas, with consequent benefits to amenity and biodiversity as well as helping to reduce the future impact of climate change."

The existing land presently acts to achieve all of the above and yet the planning authority is now proposing to undo this by rezoning for future development.

The Draft Arklow Town Development Plan. 2011-2017

The Draft Arklow Town Development Plan 2011-2017 new policies on development standards provides in depth and detailed guidelines on development in flood prone areas. Under Chapter 8, Flood Management Strategy, it clearly states, *"the avoidance of development in areas where flood risk has been identified shall be the primary response."*

Under the new Draft Arklow Town Development Plan 2011-2017, a revised flood map (Map No.8.01) has been produced to show an updated prediction on the extent of flood prone areas in the town.

This map clearly shows the entire subject site is located within the flood prone area. It should be noted that under P.R.R. 09/10 on the subject lands, older outdated flood maps were used and indicated that a portion of the site lied outside the flood prone area and this was the basis for approving development. This is clearly not the

case.

Under the draft development plan, the subject lands are designated as "Flood Zone A", where the probability of flooding is highest and where a wide range of receptors would be vulnerable. By applying the standards as set out by the draft development plan and the DoEHLG flood risk management guidelines justification test for development plans, the site should not be considered for re zoning.

Justification Test, section 2 asks the following:

The zoning or designation of the lands for the particular use or development type is required to achieve proper planning and sustainable development of the urban settlement and in particular:

- (i) *Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement*
 - It is not essential for regeneration or expansion. The County Managers initial opinion has already stated that there are sufficient zoned lands to accommodate future settlement.
- (ii) *Comprises significantly of under-utilized lands*
 - It is not significant under utilized lands and the lands have always been undeveloped due to flooding and being part of flood storage basin.
- (iii) *Is within the core or adjoining the core of an established or designated urban settlement*
 - It adjoins the core settlement.
- (iv) *Will be essential in achieving compact and sustainable urban growth*
 - It is not essential in achieving compact and sustainable development.
- (v) *There are no alternative lands for the particular use or development type in areas at risk of flooding within or adjoining the core of the urban settlement.*
 - There are alternative lands available for residential development without the risk of flooding.

The rezoning of the said lands is not essential to the future development of the area and will only exasperate the existing flooding problems experienced in the immediate vicinity. The reduction in size of the existing flood storage basin to Ferrybank and Dublin Road will magnify future flooding to the area and is contrary to proper

planning and sustainable development.

Background Issues paper for the Arklow Local Environs Plan 2011 – 2017(October 2009)

The background issues paper published in October 2009 by Arklow Town Council and Wicklow County Council raises the main issues:

- In what way should the plan make provision to prevent flooding in Arklow.
- How do we protect existing floodplains.
- What measures can be implemented to prevent roadside flooding.
- What design features can be introduced in relation to urban developments to minimise flooding.

By allowing future residential zoning on the subject land that presently cannot cope with heavy rain and overflows onto the main N11 and surrounding properties, will only result in aggravating the flood problem rather than preventing one. As noted previously, should the objectives of the DoEHLG guidelines be used in the assessment of this site's suitability, Rezoning should not be proposed for the subject site.

Arklow Flood Study Report by PH McCartney & Partners (2002)

The Flood study report 2002 highlights the existing flood patterns and proposes short and long term recommendations to mitigate the risk of flooding in Arklow. Ferrybank is noted as a particularly sensitive location for flooding, noting that the floodwater generally flows adjacent to the Safeway garage and then across Dublin Road and Sea Road before entering the lower lying areas of Ferrybank. The report concludes that *"the marsh floodplain is an essential factor in reducing the severity of flooding in Arklow and should be maintained in its current form"*

While I accept that the land is not part of the Natural Heritage Area designated lands, it is still wholly contained within the flood zone area and floodplain of the marsh. It must be noted that other lands in the immediate vicinity that are also not part of the NHA designated area, are still proposed to be zoned within the "Conservation Zone". Why is an exception being made for a parcel of land that lies at the core of flooding problems to the Dublin Road and does not meet any of the standards as set out by national or local guidelines?

Conclusion

The issues I have raised are valid and legitimate concerns that will have a negative impact on the surrounding area and increase the flood risk to my home and existing properties.

The published supporting documentation and evidence I have provided clearly shows the site lies within the flood prone area.

Minister Gormely states in his Minister's Foreword of the DOEHLG Flooding guidelines that *"the effect of climate change, such as more severe rainfall events and rising sea levels, will increase these risks and may put other areas at risk that may not have flooded in the past"* and as a result, we should avoid development in areas at risk of flooding.

Section 3.6.11, Flood Risk Management Guidelines for Local Authorities of the Environmental Report of the Arklow Town Development Plan states the following about lands that are proposed to be zoned under the proposed draft plan.

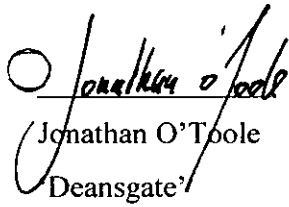
"Planning authorities will ensure development is not permitted in areas of flood risk, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development' therefore the SEA may recommend that compliance with the Guidelines will require that certain lands should not be rezoned for development in the proposed draft Plan."

To rezone a site that does not meet the standards as set out by national, county and local policies, is contrary to proper planning and sustainable development and will have long term environmental, economic and social costs. It should be noted that in some circumstances, particular sites are just not acceptable for development.

Please understand that my main concern is to protect the residential amenity of my home and neighbourhood from poorly planned and unsustainable development.

I kindly request that my views are strongly considered in the preparation of the new Town Development Plan and that the proposed land is not re-zoned to "Existing Residential"

Yours sincerely


Jonathan O'Toole
Deansgate

Dublin Road

Arklow

Co. Wicklow

Appendix A - Draft Arklow Town Development Plan 2011-2017 Map No: 11.01

- Draft Arklow Town Development Plan 2011-2017 Map No: 8.01

Appendix B - Irish Independent Article dated 26th November 2009

- Irish Times Article dated 14th October 2009

- Irish Independent dated 10th October 2009

APPENDIX A

○

○

○

Land Use Zoning

See Enlarged Map.

© Ordnance Survey Ireland. All rights reserved.
Licence Number 2008/10CCMA/Wicklow County Council



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

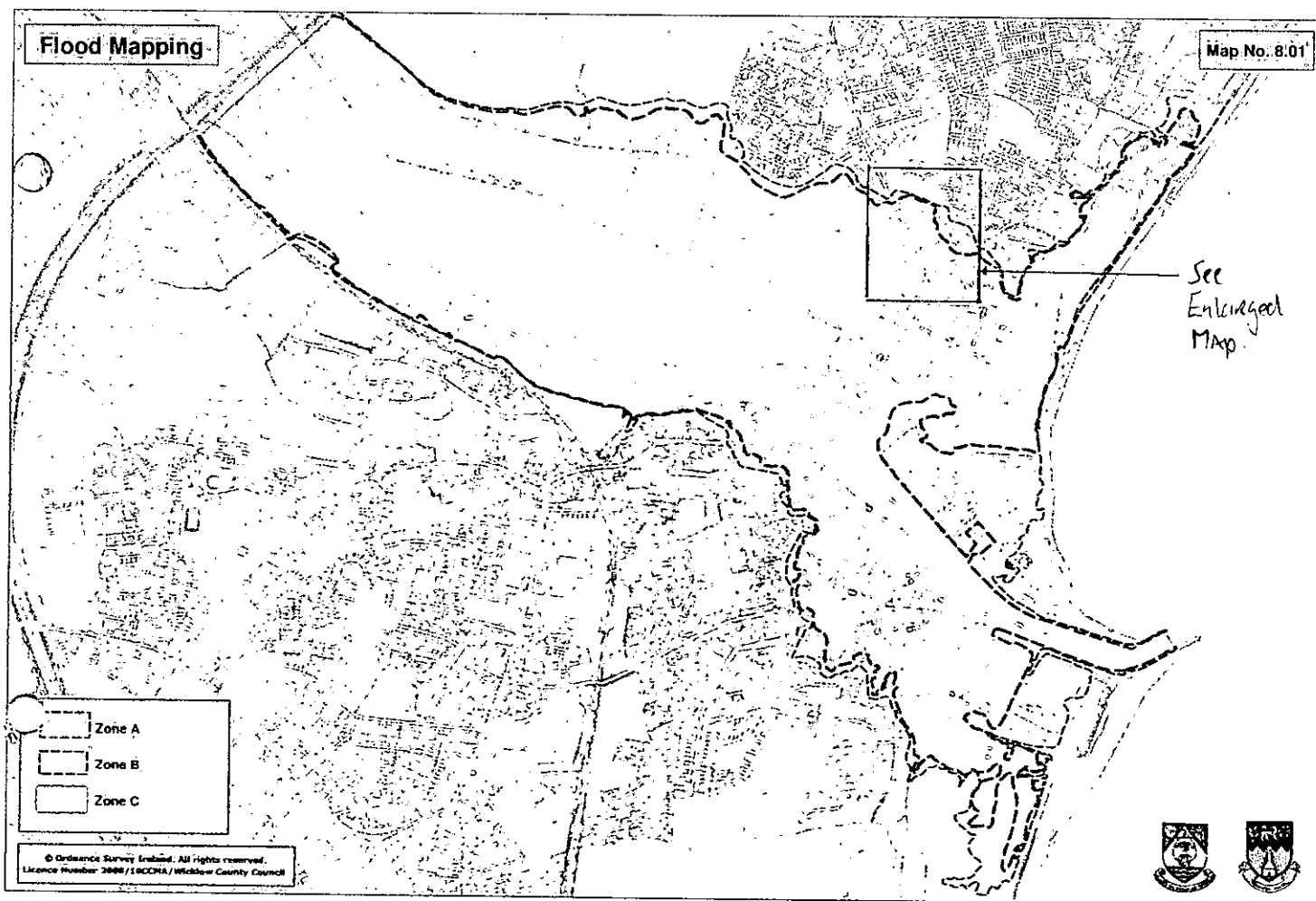
Land Use Zoning Map Enclosed.



Land subject to submission marked with letter 'x' Above.

Flood Mapping

Map No: 8.01



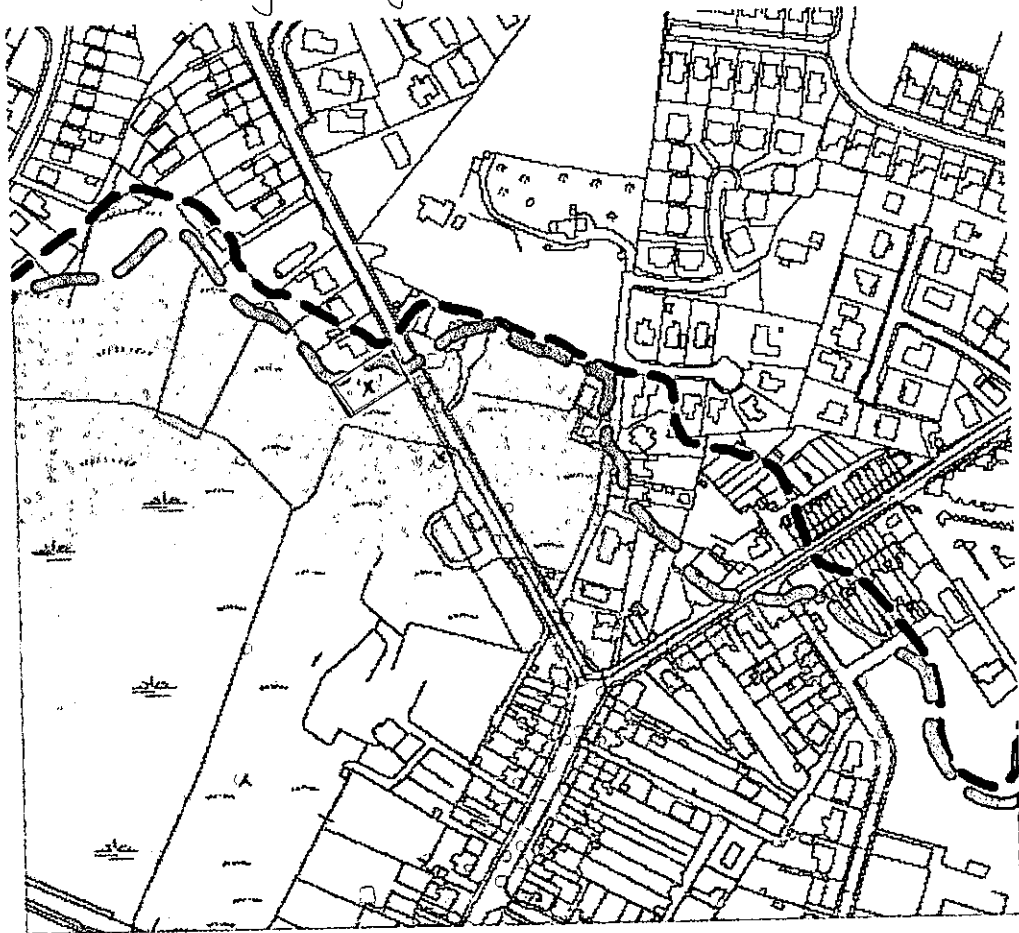
See
Enlarged
Map.

- Zone A
- Zone B
- Zone C

© Ordnance Survey Limited. All rights reserved.
Licence Number 2008/18009A/Wicklow County Council



Flood mapping Enlarged.



Land subject to submission marked with letter 'X' above

APPENDIX B



BUDGET 2010
All the latest
news, reaction
and in depth
analysis
SEE THE BUDGET



Win Family Tic
Every week

- News
- Business
- Sport
- Entertainment
- Health
- Lifestyle
- Education
- Travel
- Opinion
- Farming
- Weather
- Today's Paper
- Newspapers

You are here: Home > National News

Bad planning to blame for floods disaster, says Gormley

SHARE PRINT EMAIL TEXT SIZE

By Fionnan Sheahan and Patricia McDonagh
Thursday November 26 2009

ENVIRONMENT Minister John Gormley last night pointed a finger of blame at bad planning and building on flood plains for the flooding crisis across the country.

Mr Gormley said it wasn't possible to say how big a role planning and development played in the flooding but it was clearly a factor -- and that harsh lesson was now learned.

"I think it makes sense to most people that building in flood plains is not a good thing. And I think over the years we have ignored good planning advice, we have zoned in areas that should not have been zoned and those lessons have been learned," he said

Taoiseach Brian Cowen ominously predicted the flooding crisis is going to get worse before it gets better.

Attention switched to the Shannon region as continued rainfall meant the height of the river kept rising, with an additional three inches on water levels expected last night.

The Government was closely monitoring the release of water from the Parteen Weir on Lough Derg to assess its impact.

Mr Cowen, after chairing a meeting of the Emergency Coordination Committee, said: "This is an ongoing emergency and, while everything that can be done is being done, I expect conditions in certain areas to get worse before they get better."

Defence Minister Willie O'Dea said the ESB was only releasing water into the Shannon in line with safety precautions.

"If the dam was to collapse ... that would be potentially catastrophic," he said.

Mr Cowen also defended the use of means tests to give out the €10m worth of humanitarian

Related Articles

Related Articles

Fears of more floods as water level rising

Ads by Google

Budget Planning Demo
Easily Administer Applications with Cognos. See Planning Demo Now.
www.cognos.com

IT Capacity Management
True Capacity Planning Software for IT Service Optimization.
www.tear.com

SAP ERP Solutions
Discover the benefits that a modernised ERP system offers.
www.sap.com

Irish Experts in CPM
Budgeting, Planning, Forecasting, Analysis software and services
www.cpm.com

aid to flood victims. He said the spending of taxpayers' money always had to be accounted for. Mr Cowen also signalled the Government would be adding to the €10m relief package and it was just a start by the Government. He also said he believed it would be a "good idea" for a meeting to be arranged between Enterprise Minister Mary Coughlan and the Irish Insurance Federation to specifically discuss flooding problems.

Claims

He said there will be a reassessment of risk by insurance companies arising out of the claims which will now emerge following the floods.

And he pointed out that such assessments in the past have led to increased premiums being sought by insurance companies in the same way as having an accident affects one's no claims bonus in vehicle insurance.

Mr Cowen said there could be a role for the Department of Enterprise, Trade and Employment, which deals with the insurance industry, to see a fair and honest assessment is made and to liaise with the industry to ensure insurance cover is available to people.

Affordability will now become an issue because of the claims which will now arise, he said.

- *Fionnan Sheahan and Patricia McDonagh*

Irish Independent

SHARE

PRINT

EMAIL

TEXT SIZE

Ads by Google

Storm Technology

Best Practice SharePoint Solutions High Performance Workplaces
www.storm.ie

Self Build House Build

Save up to 30% on contractors rates Self Build Project Management
www.selfbuildpm.net

Model flooding & overflow

Modeling software to prevent sewer overflow & stormwater flooding.
www.bentley.com/overflow/flood

Property Surveys

Structural & Condition Surveys Carried out by a Chartered Engineer
www.johnpaulandassociates.com

Search

Go Advanced Search

©Independent.ie Sitemap | E-mail sign-up | Contact us | About Us | Terms & Conditions | Privacy | Advertise with

'Excessive' land zoning criticised

ELAINE EDWARDS

Wed, Oct 14, 2009

Some development land may have to be 'dezoned' in order to return to realistic planning and development and to restore a sustainable market, the chairman of An Bord Pleanála has said.

John O'Connor said "excessive and unsustainable zoning of land" had been a contributor to the property bubble and its aftermath.

He said bad planning had long-term environmental, economic and social costs.

There could be "no expectation" that proper planning standards would not be applied to development proposals, even where the land was linked to "distressed loans", he added.

○ He was speaking as the board's annual report for 2008 was published today.

Mr O'Connor said it would be "extremely short-sighted" if there was any tendency to relax good planning standards in response to our current economic difficulties.

"Now, more than ever, we need to embrace the principles of good planning and sustainable development in order to prevent further deterioration of our environment, to respond to climate change, to maximise the return from expensive infrastructure investment, to get the most efficient use of limited land resources and to help restore confidence by producing well located good quality developments," he said.

The planning appeals board chairman said there was increasing evidence that many of the current local authority development plans are replete with such excessive zonings.

"If we are to return to realistic development planning some of this land will have to be dezoned and facing up to this has a part to play in deflating the bubble and restoring a sustainable market."

○ Mr O'Connor said the planning bill currently before the Oireachtas should ensure a much more coherent and sustainable approach to zoning and that it was a very welcome response to the trends over recent years, to which he had "repeatedly drawn attention to in the past".

"Thus, anyone now assessing property values in terms of development potential must in many cases look beyond the particular zoning and focus on the availability of services and infrastructure and the other parameters of good planning such as densities, heights, impact on amenities and the orderly sequence of urban expansion."

An Bord Pleanála had a total intake of 5,800 in 2008, according to the annual report.

The chairman said that while this was down on the record intake for 2007, it was still "very high by historical standards" and it meant the board continued to be under severe workload pressure in 2008.

The number of cases of all types on hand peaked at over 3,000 in March 2008.

○ But with the continued drop in intake (over 30 per cent) and special measures to maximise output,

the number of cases on hand had been almost halved to 1,550.

Some 36 per cent of cases last month were determined within the 18-week statutory objective and the average time taken across all cases was 20.6 weeks.

The board said it regretted delays that had occurred and that it believed it was approaching the point where routine delays can be eliminated.

In general trends, the percentage of local authority decisions appealed to the board increased from 6.7 per cent to 8.1 per cent. (46 per cent were received from third parties).

The proportion of local decisions appealed which were reversed by the board remained steady at 33 per cent.

First party appeals against refusal resulted in grants of permission in 28 per cent of cases, compared to 29 per cent in 2007.

Third party appeals against grants of permission resulted in 39 per cent refusals, compared to 37 per cent in 2007.

© 2009 irishtimes.com

Councillors zone enough land to build homes for three million

By Paul Melia, Edel Kennedy and Fiach Kelly
Saturday October 10 2009

THERE is enough land zoned in Ireland to build homes for over three million extra people -- equal to two-thirds of the current population.

An Irish Independent investigation today reveals there is enough zoned land to build over a million homes -- or 22 years' supply in a normal market.

But councillors continue to allow would-be developers to turn fields into landbanks, even in a stalled housing market.

One-third of the toxic property loans going into NAMA are linked to land, meaning that the taxpayer could be stuck with €20bn of loans linked to fields that may never be developed.

The huge oversupply also casts doubt on the ability of the 'bad bank' to turn a profit or break even.

Based on an annual need of 50,000 homes a year in a normal market, there is enough land to meet demand for housing until at least 2031.

A staggering 38,000 hectares of land could now lie undeveloped for decades to come -- presenting a major headache for the taxpayer. The Irish Independent has found:

- There are currently 1.46 million homes in the country, but enough zoned land for 1.1 million more houses and apartments to be built.
- Based on the fact that Irish homes have an average of 2.75 occupants, the zoning provides for enough extra housing to accommodate more than three million people.

The figures call into question the principle of the State's bad bank offering long-term values of 10 years on these landbanks, especially as the property market has stalled and few people are buying homes.

But some councils are still zoning land for residential purposes and making drafts of their development plans obsolete weeks after they are finalised.

A senior planner in the north of the country said: "We had a plan two weeks ago but the council keep adding more . . . against our wishes."

While not all the land is serviced, in many cases the taxpayer has also invested hundreds of millions of euro providing roads, sewage treatment plants, power lines and drinking water. These are investments which are unlikely to be used for years.

New planning guidelines due out next month suggest that, in a low-growth scenario, the country's population will rise by 953,200 people to 5,375,200 by 2022. But there is enough land zoned for housing to accommodate three times this population surge.

Under new laws, Environment Minister John Gormley will oversee a radical change in the country's planning system.

Councils will be allowed to rezone land from residential back to agricultural use if there is an oversupply. But they will not be allowed zone land which does not meet national planning guidelines.

Oversupply

But oversupply already exists on a massive scale. Donegal, with a population of 147,000, has enough zoned land for 92,491 houses or 250,000 people. Meath, with a population of 162,000, has enough zoned land for 318,205 more people.

Last year an acre of agricultural land in Meath cost €20,000 while development land would have

cost €200,000.

One local auctioneer said: "Agriculture is about €8,000 to €10,000 an acre now, but there really is no market for development land."

A Department of Finance spokesman said NAMA "will only take on loans it sees it can realise over 10 years"

"If there's that amount of land, it doesn't mean NAMA will take it on. There is a discretionary part to this," he added.

- Paul Melia, Edel Kennedy and Fiach Kelly

**Submission Form
Arklow Town & Environs Plan**

Name The Case for a New Community Centre
 Address 40 Community Centre Action Group
County Wicklow Partnership
AVOCA RIVER HOUSE
Bridgewater Centre, North Quay, Arklow

Comments:

We are pleased to present the submission (attached) for a new community centre in Arklow for inclusion in the draft plan consideration. We attach herewith a brief summary and a copy of the professionally prepared feasibility study "The Case for a Community Centre in Arklow".

Our newly formed project committee 'Community Centre Action Group' (CCAG) will be pleased to make a presentation to your decision makers at the appropriate time.

We are looking forward to acknowledgment of this communication and to meeting you in the near future.

Signed: J. Creghan



Date: 26-10-10



Proposal for a New Community Centre for Arklow

Name: Community Centre Action Group(CCAG)

C/O County Wicklow Partnership

Avoca River House

Bridgewater Quay

Arklow, Co. Wicklow

Contacts: Frances Creegan, (Project Co-ordinator), Tel: 0402 20955 Mobile: 0858006872 and Miriam Murphy, Tel: 0877571040

Introduction to Submission:

Please consider the below plan for consideration in the Arklow Town and Environs Development Plan 2011 – 2017. A Community Centre Action Group (CCAG) was formed to create a working group to explore and attempt to realise how a new accessible space for the whole community of Arklow could be achieved. The development of the Community Centre is supported by an extensive survey *The Case for a New Community Centre in Arklow* published in 2008 (Please see copy of the Report attached to this submission). Feedback from the survey and from more recent public meetings demonstrates that a dedicated community centre will create a more cohesive community as well as promoting the social, economic and cultural development of the town.

The Case for a New Community Centre in Arklow, A Feasibility Study conducted in 2008 on behalf of the former Arklow Community Enterprise, now merged with Wicklow Rural Project and Wicklow Working Together to form County Wicklow Partnership identified community accommodation need where 80% of local groups in Arklow surveyed reported an unmet accommodation need. Some changes and needs met since report, i.e. New centre for Youth due to open. The GAA have extended their facilities in Arklow environs. Despite these improvements Community groups and charities continue to struggle to find adequate space, accessible space and affordable space for their activities and operations.

Benefits for town:

- A quality flexible space for the whole community
- An affordable space for non profit making organisations and groups
- Inspiration for innovations
- Environmentally Friendly space – attracts grants
- Commercial Nature – Wi Fi Antennae
- A space that is flexible enough for multi uses
- Dedicated community space helps create integration and cohesion,
- A civic space to inspire pride
- Big enough to attract quality events and talent from outside
- Accessible Exhibition Space
- Enhanced Cultural Activities made possible, raising cultural profile of town

Community Groups that will benefit:

- Community Childcare including After School Care and Mother & Toddler initiatives
- Irish Cancer society
- County Wicklow Partnership – support various community groups and community events that continually need space
- Theatre groups
- Music Groups
- Range of Community groups
- Disability access for all groups
- Arklow Town Council
- Space for future development of youth activities not able to be accommodated in limited space of new Youth Space
- Fáilte Isteach – Drop in for free English conversational classes for migrants
- Festival Committees
- Cárde Chéile
- Arklow Disability Action Group (ADAG)
- Wicklow Local Authority Access group

Events that will benefit:

- Arklow Music festival
- Arklow St. Patrick's Day Celebrations
- Arklow Multicultural Food festival & other multicultural events
- Seabreeze Festival
- Civic Receptions
- School Talent Concerts
- Sports and recreational Courses
- Drama and theatre productions
- New events could spring up as a result of new space

The Proposed Community Centre:

A community building of approx. 1,030 sqm was considered to be the most appropriate building size and type to fit the needs identified and to cater for future need. The accommodation proposed included at a minimum; a main hall with stage, 3 meeting rooms, an office and basic service provision, e. g. modern kitchen, toilet facilities, storage etc.

Cost: Report in 2008 estimated at ca. 1.67M Euros with an approx. 3 year timeline for project planning and project management to completion. Cost includes a basic fitout but excludes furnishing and external landscaping. A 7% design fee needs to be added to above total. Due to the current Economic downturn it is envisaged that the total cost of the build could be up to 40% less than stated above. Budget to meet cost achievable in context of a 2 year multi-partner investment plan.

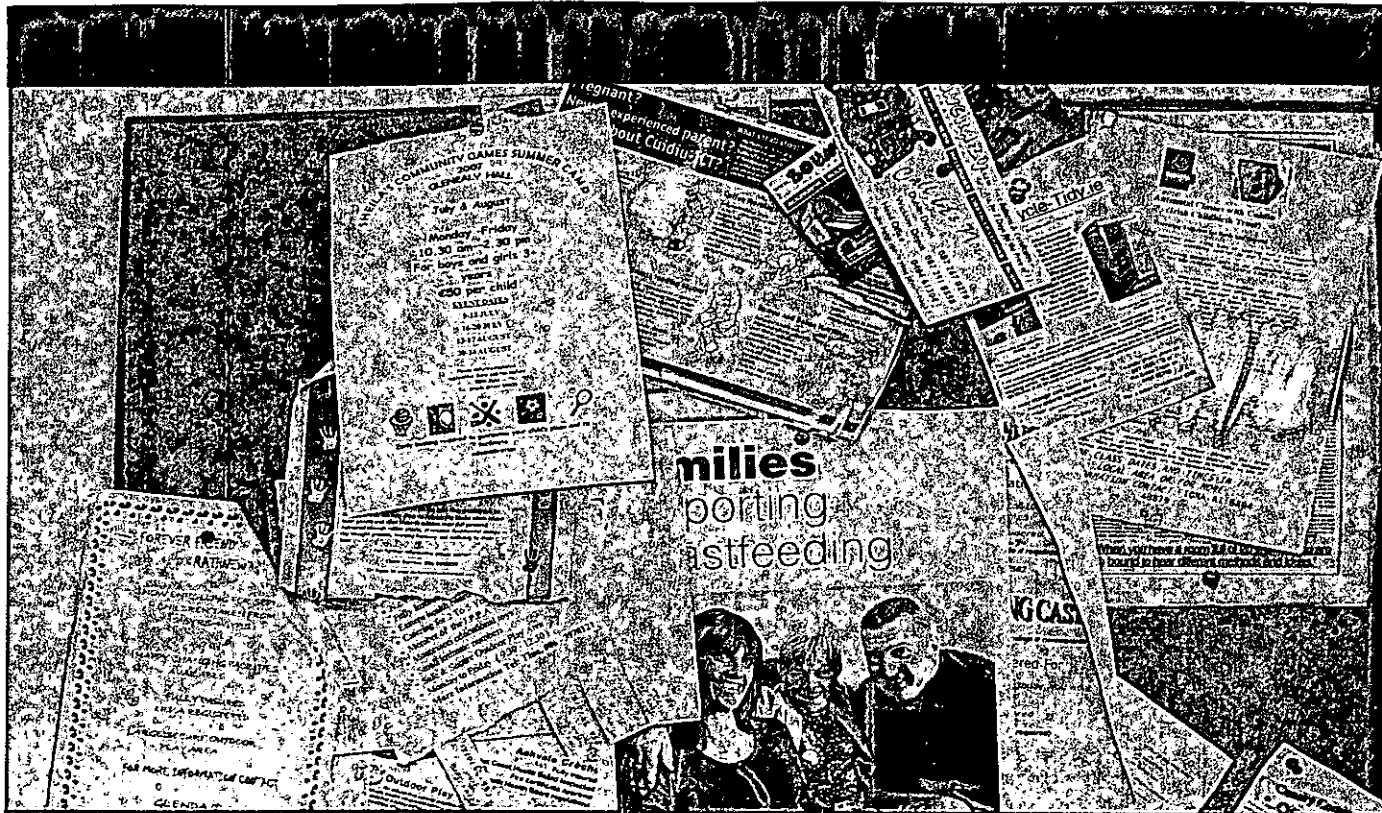
The vision for the centre is to create a socially inclusive space for all members of the community. This is in keeping with the ethos and guidelines of **the National Action Plan for Social Inclusion (NAP inclusion) 2007-2016**. A welcoming and affordable space for community groups and community events would help County Wicklow Partnership to carry out the **Local Community & Development Programme, part of the National Development Plan 2007-2017**. A dedicated community centre run along progressive guidelines to create equality of opportunity will bring in marginalised and disadvantaged groups into community activities which is one of the main goals reflected in **Wicklow County Policy Recreational Policy** (4.4. on Social Inclusion and Policy C1).

Signed:

Date:

J. Creegan

26th October 2010



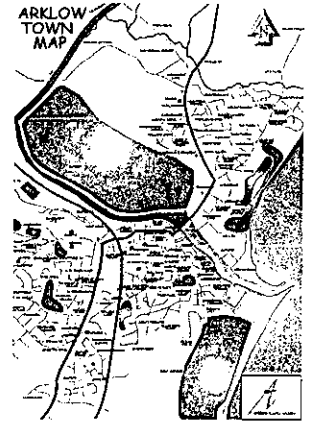
The Case for a New Community Centre in Arklow

A FEASIBILITY STUDY CONDUCTED ON BEHALF OF ARKLOW
COMMUNITY ENTERPRISE

Written by Ruth Pritchard
and Eleanor Sheehan

June 2008

RSP consulting
.....



Foreword

Arklow Community Enterprise commissioned RSP Consulting early in 2008 to undertake a feasibility study on the potential to develop a new community centre in Arklow. ACE is a Community Partnership delivering a number of programmes, including the Local Development Social Inclusion Programme and the Springboard Family Support Project. ACE networks extensively with all social inclusion groups in Arklow, and founded the Arklow Social Inclusion Network in 2005. This networking enables ACE to keep in close contact with the entire community in Arklow.

In order to achieve its aims, ACE actively researches the needs of community groups in the town and develops projects and activities in response to the identified social and economic needs of the community. This feasibility study was commissioned on the basis of the long held view of community members, that a new community centre is needed in Arklow; that is available and accessible to all, at a reasonable cost.



TABLE OF CONTENTS

Foreword..... 1

Acknowledgements 3

Executive Summary 4

 A supportive development environment..... 4

 A clearly identified community accommodation need 5

 A viable community centre 5

 The proposed community centre 6

 Next steps 6

Introduction 7

Development Context..... 8

 Arklow profile 8

 Planning context 8

 Arklow Development Plan 2005 - 2011 8

 Community facilities hierarchy 9

Play space 9

 Population..... 9

Childcare needs 10

Need for youth drop-in facilities 11

Need for performance space 12

Existing Arklow Community Facilities 12

 Community venues nominated by groups..... 12

Accommodation profile and use issues 13

 Audit of existing community centres 14

Arús Lorcaín (Arklow Parish Centre)..... 14

Arklow Silver Band Hall..... 15

Presbyterian Church Hall 15

Masonic Hall..... 16

Marlborough Hall 16

Arklow Sea Scout Hall..... 16

St. Colmcille Arklow Pipe Band – The Lar Cullen Hall..... 17

Pigeon Racing Club Hall..... 17

Summary of existing accommodation use issues 17

Analysis of Accommodation Needs 18

 Survey of community groups 18

Profile of respondent groups 18

Profile of respondents existing use 19

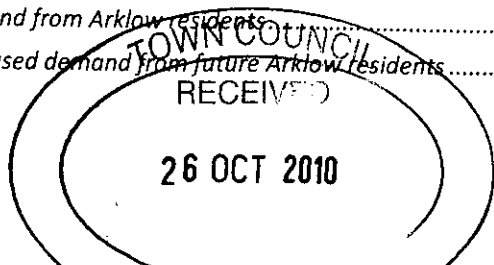
Profile of respondents future needs 20

Summary of community group responses 22

 Future accommodation need 22

Demand from Arklow residents 22

Increased demand from future Arklow residents 22



Selected Case Studies	23
Case Study 1: Santry Community Centre	24
Case Study 2: 'd'Ca' Youth Café, Blessington.....	25
Countywide study of community facilities.....	26
A New Community Centre for Arklow	26
Views of public workshop participants	26
Building concept principles	28
Analysis of potential building locations	29
<i>Areas designated for community facilities</i>	29
<i>Areas designated as open space</i>	30
Development potential of Churchview site	30
<i>Access</i>	31
Concept design	31
<i>Proposed schedule of accommodation</i>	32
<i>Future phase additions</i>	33
<i>Car parking</i>	33
Indicative building cost	34
Management issues	35
<i>Legal entity</i>	35
<i>Management principles</i>	35
<i>Role of the Board</i>	35
Financial issues	36
Relevant Support Organisations and Resources.....	38
Wicklow County Council	38
Arklow Town Council	38
County Wicklow Partnership	38
Arklow Chamber of Commerce.....	39
Co. Wicklow VEC	39
FÁS	39
Wicklow County Childcare Committee	40
Conclusions	41

Acknowledgements

The authors acknowledge the support of Arklow community groups and the management of Arklow community halls and centres, who participated in the research and made themselves available to clarify issues and to answer specific queries. Other individuals and organisations; notably including Des Nichols (Arklow Town Council), Deirdre Whitfield, Margaret Malone (Community and Enterprise Directorate, Wicklow County Council) and Jeremy Kynaston, (Wicklow County Childcare Committee) also made important contributions to the research. The management teams of Santry Community Centre, St. Joseph's Hall, Blessington and The Brockagh Resource Centre, Laragh provided comprehensive information on their centres for comparison purposes. Finally, the commitment and valuable inputs of the Manager, the Chairperson and the Board of Arklow Community Enterprise are recognised by the authors.

Ruth Pritchard
RSP Consulting

Executive Summary

Arklow Community Enterprise commissioned RSP Consulting early in 2008, to test the long-held local view that new community accommodation is required in Arklow to cater for active local community groups serving an expanding population and for whom space is not currently available, or does not suit their needs. In addressing the core question of whether a new centre in Arklow is feasible, the research team of Ruth Pritchard (RSP Consulting) and Eleanor Sheehan (Eleanor Sheehan Architects) consulted closely; with local accommodation users, with the management of existing venues, with the Local Authority and other interested stakeholders.

The main questions raised with research participants were:

1. Can the existing planning environment support a new community centre in Arklow?
2. Do Arklow based community and community facility management groups agree that a new community centre is needed and who would use the centre?
3. Can the community centre be economically feasible, assuming that external resources would be required for its construction and operation¹?
4. What would a community centre that fulfils the needs of Arklow residents look like?

The responses to these questions have been described in full in the research report that follows. This report collectively summarises the views of Arklow community participants in the research and presents the conclusions and recommendations of the project consultants.

A supportive development environment

The evidence of demographic change in Arklow over the past decade or so, is writ large in Arklow's physical and social structure. Today, Arklow is one of Wicklow's fastest growing towns, close in population size to that of Wicklow Town and projected to grow at similarly dramatic rates in the near future. In addition, Arklow is a regional provider of basic services such as health services to a number of rural communities in the surrounding environs. The population of Arklow is young and active, with age dependency rates similar to the national average. Arklow's profile of social disadvantage has been well documented, resulting also in the existence of a large number of Arklow based local development and support groups and a relatively ad-hoc, long history of community facility construction.

Following a review of the policies and development plans at national, regional and local level, the authors believe that a 'development space' exists within current development planning for a new community centre project. This case is supported by staff at Arklow Town Council and has also been supported in previous incarnations by local elected representatives. In addition, the existing social inclusion network offers a viable platform for the establishment of a project development group. In terms of the planning and development context therefore, the researchers believe that this project is feasible, subject to the capacity of a new project management committee to achieve a partnership approach to its development and to galvanise local support.

¹ It should be noted that longer-term operational feasibility was not specifically researched in this report.

A clearly identified community accommodation need

Eighty per cent (80%) of local groups in Arklow surveyed reported an unmet accommodation need. A telephone survey of existing community centre management committees asked these for a self-assessment of available capacity and sought general views of local accommodation need. This review also supported the case for an accommodation need in Arklow. Furthermore, local centres were not able to substitute for the needs identified by groups due to their existing capacity, condition or in some cases, founding remit. In addition, analysis of the responses received indicated that the profile of accommodation need highlighted in the research would continue to grow in line with projected rapid population growth by 2016.

The evidence suggested that the nature of this unmet need was for dedicated community space for particular target groups including; social space for young people (teenagers), childcare space (particularly in Arklow UD No. 1), space for non-mainstream recreation activities, space suitable for people with either a reduced mobility (e.g. older people) or people with a disability and space suitable for performance groups. The nature of the current accommodation provided for these groups was found to be either of an unsuitable standard or insufficient in terms of availability. Many of these groups experience social exclusion and their membership will comprise significant numbers of people on low incomes. The principle of inclusiveness will therefore be of critical importance to any new centre's mission. Moreover, respondent community groups identified most types of accommodation need at some level. Overall, a clearly identified community accommodation need indicated that any new centre would receive community support and would be feasible to operate on this basis.

A viable community centre

Relating directly also to the principle of inclusiveness, the importance of affordability of community accommodation to Arklow groups was clearly indicated in the research outcomes. Few community centres were sustainable solely through local fundraising and all active multi-functional facilities required some level of external support. In turn, this implied that a proactive, community needs oriented management board and staff would be required to manage the centre. In addition, the building construction would require careful design and fit out to ensure that the appropriate technical standards were met for particular categories of use.

Viability was considered on the wider basis of potential community occupation rates, available external capital funding opportunities, a future-proofed design and the capacity of the community to realise the project. The research found that community occupancy was projected at a sustainable level. Further, external funding sources were found to be available as potential sources of capital and technical support funding. The quality of the build was considered in the design and costing proposed, arrived at following a review of similar community buildings.

A brief assessment of successful community centres revealed that a community centre required a competent, transparent community centre management board. Some evidence was provided through the research that a previous unsuccessful attempt to secure a new community centre for the town has negatively impacted on local motivation to initiate a new project. In responding to the needs outlined in the study, the importance of engaging the wider Arklow community for any new development project should be to the forefront of planning.

The proposed community centre

A relatively large sized community building of approx. 1,030 sqm was considered to be the most appropriate building size and type to fit the needs identified and to cater for future need. The accommodation proposed included at a minimum; a main hall with mobile stage, 3 meeting rooms, an office and basic service provision, e.g. modern kitchen, toilet facilities, storage etc.

The capital development cost was estimated at ca. €1.67M with an approx. 3 year timeline for project planning and project management to completion. The budget to meet this cost was considered to be achievable, in the context of development of a 2-year multi-partner investment plan. The projected budget for any new community centre was anticipated to reach ca. €250,000 from year 1 to year 3. Staffing was likely to constitute the single most important operating cost at approx. €120,000 for up to 3 proposed staff members.

From a review of the potential locations made known to and assessed by the research team during the study, a site at Churchview was considered to be the most appropriate location for the new centre. This location would also provide for external car parking, equipped play space, informal recreation activity and appropriate landscaping. The site is publicly owned and available subject to agreement with the Churchview estate community and with Arklow Town Council. It is noted that other opportunities may become available in the future. The design of the building should cater for the specific needs of particular groups, e.g. childcare, social drop in for youth, active recreational use, performance use and use by people with a reduced mobility or with a disability. In addition, the design selection should specifically seek to future proof the building by means of the high quality of materials used and by installing energy efficient systems.

Next steps

Given that a project development committee has yet to be established, the authors have appended some recommendations for actions to support a transition from the feasibility phase to the project planning and development phase. These include actions to:

- Ensure community investment and support
- Establish a project management committee
- Prepare a realisable project management plan
- Develop key partnerships for external funding partnerships.

The most important of these steps is the first – fostering a community commitment to the project.

Introduction

In early 2008, RSP Consulting was commissioned by Arklow Community Enterprise to research the potential to develop a new community centre in Arklow. The terms of reference for the feasibility study specified that the study should serve to:

- Profile the existing use of community accommodation in the town.
- Explore the current and future accommodation needs of Arklow-based community groups.
- Learn from the experience of other, similar community building projects.
- Examine the development environment, potential resources and supports available for any new community centre.
- Offer recommendations on the feasibility, construction, cost and management of a new community centre in Arklow.

Thirty-seven community groups, organisations and schools in Arklow participated in the research by completing a survey containing questions on their current use of community accommodation and their future accommodation needs. This information was combined with the outcomes of a desk study of the social development context in Arklow, a brief examination of potential development sites and an audit of existing community accommodation. At a subsequent public workshop, the accommodation needs highlighted by community groups through the survey questionnaires were clarified and refined. Two management meetings of the ACE Board served to provide further feedback to the consultants. A meeting was also held with Arklow Town Clerk, Mr. Des Nichols, to discuss potential site locations. A comparative analysis of equivalent community centres in Wicklow and elsewhere then allowed the research team to tailor feasibility proposals in the light both of self-reported community needs and the experience of community groups from elsewhere.

The feasibility study presented here reflects the outcomes of all of these research elements, and concludes that a new community centre is needed, is feasible to construct and can be sustained by the community through active external partnerships.

Figure 1: Research methodology



Development Context

Arklow profile

Arklow is an ancient harbour town located at the mouth of the River Avoca, on the east coast of Wicklow and the fastest growing town in Co. Wicklow. Known for its bridge 'the nineteen arches' built in 1759, Arklow has a rich history centred in seafaring, fishing and boat building². In the 20th century, Arklow's strong industrial base included an important pottery industry. Most recently, Arklow has become known for the Arklow Wind Bank, the first offshore wind farm in Ireland and its industry consisting of a mix of manufacturing, service, tourism and retail business with a particular healthcare profile. Arklow is located as an important population centre on the national primary route, the N11, which extends through the southeast from Dublin to Arklow (45 miles), on through Gorey (11 miles) to the port of Rosslare (51 miles) in Wexford.

Planning context

The Arklow Development Plan 2005 – 2011³ describes the strategic and the spatial position of Arklow in the context of the National Development Plan and the National Spatial Strategy. These plans describe an overarching policy objective for Arklow as a town of more than 5,000 people, to be strengthened as a hub town serving a wide population hinterland on an important national transport corridor. As part of the Greater Dublin Area Regional Planning Guidelines, the middle tier of national planning, Arklow is designated as a Large Growth Town II, which category is relevant to a population centre comprising up to 25,000 people. This designation again anticipates Arklow's role as a regional centre for social and economic growth, capable of providing 'whole of life' services to a wider population, including transport, retail, employment, health, recreation, education.

As a self-sustaining town, the population living within easy reach of Arklow should have no need to travel elsewhere for basic social and economic services at any stage of their lives. In recent years, the addition of a HSE Primary Care Centre, improved transportation and transport routes, the establishment of new large retail centre, construction of housing, new cinema and leisure facilities in Arklow offer collective evidence of a critical mass of public and private developments in the town resulting from an increased population size and development initiatives.

Arklow Development Plan 2005 - 2011

Many of the strategic development principles expressed in the current Arklow Development Plan are relevant to the development of community facilities in Arklow, to:

- Ensure a broad mix of zones throughout the town to facilitate a balance of housing, jobs and facilities.
- Ensure that construction design is of a high quality and appropriate to the scale and content of its surroundings.
- Create opportunities for cultural, social, community and passive and active leisure activities that maximise the potential of the existing heritage and amenity.
- Promote the involvement of the local community in decision-making and environmental sustainability issues.

² Anon. (2003) *A Profile of Arklow Town*, Wicklow, Arklow Chamber of Commerce.

³ Source for *Arklow Development Plan 2005 - 2011*: www.wicklow.ie / www.arklow.ie websites.

- Facilitate greater social inclusion to create more holistic and healthy communities. To achieve this, the Council will work with other statutory bodies and relevant stakeholders to identify, through consultation, the needs of Arklow's most socially excluded groups.
- The Council will have regard to the objectives of 'Building for Everyone' published by the National Disability Authority of Ireland to ensure that the needs of people with special needs are taken into consideration in design and construction of buildings and facilities.

Community facilities hierarchy

The Development Contribution Scheme seeks to support Wicklow County Council policy by ensuring that development contributions received under Section 48 Development Contribution Scheme maintains and enhances the provision of and access to community facilities. To implement the scheme on a planned basis, the Community and Enterprise section of Wicklow County Council established a hierarchy of community facilities. The policy states that for communities in Wicklow of greater than 15,000 persons (Level 1), accommodation provision⁴ should be made for:

- Regional sports and recreation facilities and a swimming pool/leisure centre, also minor sport interests
- Multi-purpose community resource centre and local multi-purpose community space/meeting rooms
- Specialised facilities such as a youth resource centre and arts and cultural facilities
- Playspace dedicated to formal and informal play.

A neighbourhood park (for both active and passive recreation) was also included in this category. Based on population growth predictions, Arklow will meet the criteria for provision of community facilities at the Level 1 population range by ca. 2016.

Play space

With respect to provision of a playground, the Play Policy published by Wicklow County Council in 2007⁵ offers a strategic framework within which play space is planned in the county. The policy sets out a hierarchy for open space for play areas in Wicklow by population size based on the National Playing Fields Association standards as follows:

0.8 ha. per 1,000 population, of which;

0.2 ha. per 1,000 population – equipped playspace, defined as: "an appropriately accessible, available and safe area designed and dedicated to facilitating the play, recreation and social interaction activities of children up to and including teenagers."

0.6 ha. Per 1,000 population – informal playspace, defined as: "open space that is not laid out for defined, formal sport, recreation or play space, but is accessible, available and safe for informal use by children and adults for such purposes. For example, 'kick about' areas and other informal open space within residential areas."

Population

The wider Arklow area has experienced an extremely rapid increase in population over the past 15 years, growing by nearly half (47%) between 1991 and 2006 to 11,759 persons recorded in the 2006 Census (includes Arklow Urban Districts 1 and 2, together with Arklow Environs). The trend for Arklow's growth

⁴ The description of Level 1 also includes provision of services such as a library etc. not listed here.

⁵ Community and Enterprise Directorate (2007), *Play Policy*, Wicklow County Council.

confirms that the town grew faster than any other part of Wicklow between 2002 and 2006. The current population size of Arklow is very similar to the National Spatial Strategy designated primary development centre, Wicklow Town (12,802 population).

Arklow has been designated as a town whose residents experience social exclusion, under the national Local Development Social Inclusion Plan (2000 – 2006) and will benefit from the social inclusion actions included in the National Action Plan for Social Inclusion (2007 – 2013). The following example demographic characteristics are typical indicators of social need, likely to be addressed within a dedicated community centre and relevant to this designation.

Table 1: Sample indicators of social disadvantage (Census, 2006)

Description	Arklow %	Wicklow %	Ireland %
Proportion of lone parent households	26.0%	21.2%	21.3%
Male unemployment rate	13.4%	8.5%	8.8%
Female unemployment rate	10.4%	7.5%	8.1%
Proportion of people renting from Local Authority	10.5%	8.5%	7.5%
Proportion of people with professional/managerial/technical skills	25.7%	36.7%	32.9%
Home ownership levels	73.6%	79.3%	77.2%
Proportion of people with 3 rd level education	24.8%	32.9%	30.5%
Proportion of non-national residents	9.83%	8.67%	10.06%
Proportion of people involved in voluntary activities	17.5%	21.5%	19.6%

Generally, Arklow's profile is that of a demographically young population, with 21.74% of the population aged under 15 (state: 20.39%), similar to Wicklow as a whole.

Childcare needs

The population structure of Arklow indicates a strong local need for facilities for childcare, with some 984 children aged up to 4 years living in the town (excluding Arklow environs). Childcare is an essential element in facilitating adults and parents enter into the labour force or in participating in educational courses. The importance of local childcare to residents' quality of life is reflected in the Childcare Facilities Guidelines issued by the Department of the Environment and Local Government, which require 1 facility of 20 places to be provided per 75 new dwellings built. Wicklow County Childcare Committee has recently completed a study of childcare provision in the county, reporting the following (community and private) childcare places in Arklow⁶:

No. of sessional places (up to 3.5 hours care):	218 (a.m.)
	45 (p.m.)
No. of full-time places (over 5 hours):	72

⁶ Per. comm. Manager, Wicklow County Childcare Committee, June 2008.

The results of the study indicated that Arklow Urban District No. 1 (comprising 782 children up to the age of 4) is under-resourced in terms of the provision of affordable, accessible childcare. Given Arklow's designation as an area of significant disadvantage, affordability is a fundamental criterion for the local provision of childcare. One community childcare facility (The Ark Community Playgroup) is available in Arklow. There are currently no plans⁷ to develop a further community facility to cater for future needs.

Play space needs

As indicated under the Play Policy outlined earlier in this document, the appropriate areas for equipped play space and informal play space in Arklow now and in the future are:

Description	(2006)	(2016)
Equipped play space	2.35 ha.	4.2 ha.
Informal play space	7.06 ha.	12.6 ha.

Mainstream sports such as rugby and GAA are well catered for currently in Arklow, with both pitches and club facilities available to a reasonable standard and comfort. However, Arklow has just one existing small playground, associated with the municipal Coral Leisure Centre and little accommodation for locally important but more minor sports such as basketball. In addition, Arklow has few open green spaces landscaped appropriately for informal (non-pitch sport) play. In interview with the authors as part of the research, Arklow Town Council confirmed that the development of 2 playgrounds in Arklow has been prioritised and also that provisional plans to develop a new skatepark in Arklow are underway⁸. Although welcome and significant in scale, even this proposed provision will not establish play space in Arklow at the target standard outlined above and in particular, will not meet future population needs⁹.

Need for youth drop-in facilities

In May 2006, Ann Byrne prepared an analysis of the need for social drop-in facilities for young people in Arklow¹⁰ on behalf of Arklow Community Enterprise. Based on the responses of 323 young people to an in-depth questionnaire and 14 agency stakeholder responses, findings relevant to the feasibility study were:

- Arklow had a high number of clubs and sporting activities available to young people.
- Most of these activities were available to children and young people up to the age of 14 or 15 years.
- Typically, activities available were generally sporting and competitively oriented - more boys than girls benefited from membership.
- Performance activities (music, dance etc.) for young people were also well represented.
- Existing youth clubs (3 regular, 2 occasional) were oversubscribed.
- Access to existing clubs/organisations by low-income households was identified as a challenge.
- Few opportunities to network and to socialise in a team environment existed for young people who were not interested in sporting or challenge oriented activities.
- No psychological services were available for young people.
- More than two-thirds of young people in Arklow up to the age of 17 were drinking alcohol regularly (at least once per week) and more than half were engaged in regular binge drinking.

⁷ As notified to the authors in June 2008.

⁸ Per. comm. Arklow Town Clerk, meeting held on 17th June 2008.

⁹ No exact figures for the area currently available for informal play space in Arklow were available to the authors.

¹⁰ Byrne, A. (2006) *Study on how to develop an integrated strategy to support disadvantaged young people in Arklow through the establishment of a Drop-in Centre*, unpublished report, Arklow Community Enterprise.

Through the study, young people stated a clear preference for the provision of social, drop-in type accommodation in Arklow as a place to enhance feelings of self-worth with peers, to improve wider community perceptions of young people and to reduce alcohol use.

Need for performance space

In late 2005, performance related interest groups based in Arklow came together to prepare a feasibility study on the need for dedicated performance space in Arklow.¹¹ Based on a survey of 17 Arklow groups with a performance need, the report reported the following results:

- There was no suitable venue for the performing arts, club meetings, drama, dance, theatre or music in Arklow.
- Amateur theatrical and band performances were present, but took place in makeshift or private locations.
- People could not see professional productions locally.
- Public houses, private clubhouses or one remaining hotel were the only options for local groups.

Originally initiated with respect to the need for auditorium style performance space, the group concluded that a lack generally of community space in Arklow indicated a potential for the integral theatre proposed to make complementary facilities and spaces available to community meetings, as well as providing for other heritage, exhibition and visitor amenities. To date, the group has not achieved the capital investment and annual operating subvention required to progress the project proposed.

Existing Arklow Community Facilities

The feasibility of a new community centre, was assessed on the basis also of the capacity of similar existing community centres in Arklow to cater for the accommodation needs suggested by the community and to substitute for any new building need. An initial review of responses to the community group questionnaire completed during the research, gave the first indication of a highly distributed profile of available accommodation in Arklow. A subsequent audit conducted by the consultants, provided detailed information on the current and future capacity of a range of existing generalist community facilities.

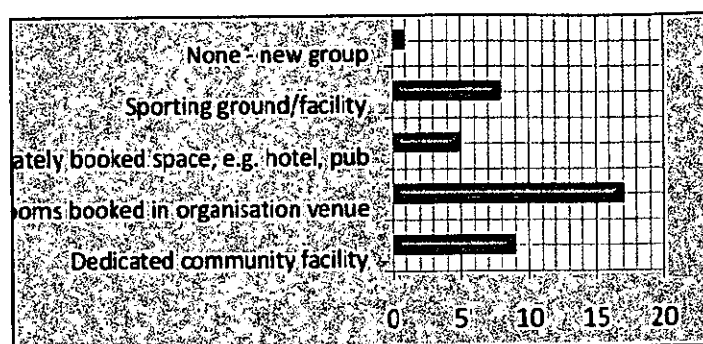
Community venues nominated by groups

Thirty-seven survey respondent groups listed a total of 40 locations where they usually met (3 groups meet in 2 different venues)¹². Just 5 groups owned the space they currently used, 1 of these groups used the family homes of members for meetings. Finally, 1 community group respondent didn't have a meeting location at present and advocated for a new centre through the survey.

¹¹ Anon. (2006), *Report to examine conditions pertaining to the provision of A Community Hall for Arklow*, unpublished feasibility study report, Arklow Community Centre Action Group.

¹² Although a number of schools completed a survey, all listed their use of sporting venues outside of the main school building.

Chart 1: Basic description of community meeting space



The list of accommodation used by community groups included rooms in organisational buildings such as the VEC Community Adult Education centre, rental of commercial space such as the Arklow Bay Hotel, use of specialist accommodation such as the Coral Leisure Centre, private accommodation such as family homes, as well as dedicated community facilities, such as Arús Lorcaín.

Accommodation profile and use issues

The majority of the venues described by groups were dedicated to a particular purpose or beneficiary group and were not generally available for 'open' booking. In addition, some had been made available on the basis of an existing relationship between the owner or main user of the building with a client or user group. A final category of venues was available for commercial rates, either for rent by the group to provide its main service, or for occasional booking on an hourly or room rate basis. The importance of commercial venues, such as the Arklow Bay Hotel (5 groups), John Joe's Pub (2 groups) and the Coral Leisure Centre (3 groups) was particularly relevant as an indicator of community accommodation need in the community and as part of a highly distributed profile of accommodation use by community groups.

In choosing from a variety of occasional accommodation, a majority of groups typically did not benefit from opportunities to engage with other groups and to share experiences. In particular for social inclusion groups, opportunities to achieve 'leverage' in terms of a collective voice or added-value benefits from funding resources (e.g. access to staff or technical supports) were negatively impacted by the geographic distribution of these groups across a number of occasional venues. For most groups, accommodation choice factors included availability, cost, proximity to members, suitability for the target group and access to specialist equipment or sporting needs. Just 9 respondent groups were accommodated in a dedicated community facility.

The majority of groups scored their existing accommodation well in terms of a range of comfort and satisfaction factors. For these community groups, the existing accommodation was easy to book, warm and comfortable, accessible, available when needed and was anticipated to continue to be so through 2008. In generally scoring the standard of the accommodation currently being rented, the average rank was just above the average at 3.09 (mean for 33 responses). Nine per cent found that their existing accommodation was 'excellent' and a further 27% reported that their accommodation was of a 'very good' standard. Almost one third of responses (30%) reported existing accommodation at a 'poor' or 'fair' standard.

Breaking this response down by type of venue used, few differences were found between the type of venue and the reported assessment of existing accommodation standard, excepting that the small number of groups using privately booked space were more likely to rank the accommodation as poor or fair relative to other groups. However, a comparative analysis of beneficiary groups (83 responses in all) and standard of accommodation rating showed that groups reported clear differences between the standard of the accommodation and the type of user of the space. Respondent groups recorded a significantly lower ranking for the standard of existing accommodation with respect to; older people, people with a social inclusion need, people with an employment need and people with a disability. Fewer groups providing services to these categories of users scored the standard of accommodation at 'very good' or 'excellent'. This indicated again that the existing accommodation available in Arklow for dedicated, or specialist use by specific social inclusion target groups was not as appropriate as that available to more generalist groups.

Audit of existing community centres

Community groups listed 6 club or hall facilities (excluding school hall or organisation owned facilities) that provided them with accommodation to deliver their services in 2007. To explore the existing use, type and capacity of existing community accommodation generally equivalent to the dedicated community facility being considered within the feasibility study, management groups of 8 existing community halls/centres were contacted to explore the nature and extent of use of their accommodation and to seek management committee views on the need for additional community space in Arklow. Two halls were not listed as a venue by any survey respondent and were nominated for inclusion by Arklow Community Enterprise (Pigeon Racing Club Hall, Arklow Silver Band Hall). Club and sporting halls not nominated by groups or by ACE were also not reviewed, e.g. Boxing Club, GAA Club facilities. Other space operated commercially (e.g. Arklow Bay Hotel) or available only to specialist groups was not included in the audit since these did not constitute an equivalent type of accommodation for the purpose of the feasibility study.

Arús Lorcaín (Arklow Parish Centre)

Arús Lorcaín was built in 2002 to serve the needs of the parish of Arklow and opened in April 2003. The centre is conveniently located behind Arklow's Main Street beside a National School, within easy walking distance of the main shops and also close to the HSE Primary Care Centre. Operated under the ownership and ethos of the Catholic Church, the centre is Arklow's sole modern, multi-functional community space, freely available for booking by a wide variety of community groups. Catering in particular for parish functions and groups and incorporating also the Parish administration office, Arús Lorcaín is a large-sized centre that comprises for community booking purposes:

- Mother Kevin room – capacity for 10 people
- Father William Ryan room – capacity for 12 people
- Father Delaney room – capacity for 25 people, with a white board, typically used for medium-sized meetings
- Glendalough Room – solely used for prayer groups and spiritual meetings
- Radharc room – seated capacity for 30 – 40 people, mainly used for boardroom style meetings
- Main hall - capable of being subdivided into 2 separate rooms and typically used for larger events, such as weekly bingo.
- Toilet facilities - including a wheelchair accessible toilet
- Modern kitchen
- Limited centre parking to front (approx. 10 spaces), with nearby paid parking facility also used.

The centre is widely used, including by the following user groups e.g.

- Parish groups, including activities organised directly by the Parish, e.g. parish bingo
- Money Advice and Budgeting Service
- Local groups and in particular health service groups
- Arklow Active Retirement Group, using the main hall for bowling
- Mums and tots group meeting two days per week, organised by East Wicklow Youth Service, who also operate a youth club from the centre.
- Weekly classes such as Unislim and Weightwatchers
- Management meetings, such as the Parish Board of Management and other community meetings.
- Occasional social events in the large hall.

The centre administrator confirmed that the centre accommodation is not generally suitable for active recreational or sporting use (excepting the regular active retirement bowls activity). In addition, use for dance or performance is also not typically available. Although busy at present, with a healthy schedule of activities, some additional capacity for new use is available in the centre. The Board of Management of Arús Lorcaín has no plans to extend the building in the foreseeable future to cater for significant additional use and could also not cater for other kinds of specialist use – e.g. for youth drop-in type use.

Arklow Silver Band Hall

Arklow Silver Band Hall was purpose-built in 1972 to provide accommodation for the Arklow Silver Shipping Band. Located on South Green, the accommodation provided in the small facility comprises approx. 159 m² including two meeting rooms, an office and a kitchen, together with toilet facilities. The hall is operated by a small, voluntary management committee, is primarily available for band practice purposes and not generally open for community booking but is used by an Irish dance group. The management committee of the Hall has generally described the standard of accommodation, as being in a 'fair' condition only and upgrading and renovation of the space would be required to cater for any additional use. No capital development project to renovate the hall is planned for the foreseeable future due to issues regarding the leasehold status of the hall.

Presbyterian Church Hall

The Presbyterian Church comprises a worship area which took its present form in 1924, adjoining an extension built in 1985 and usually called the Presbyterian Hall. Both spaces are potentially available for community use. The worship area has presentation facilities and the hall extension comprises a single large room, with a modern kitchen and toilet and with limited disability access. Owned under Trust by Presbyterian Church in Ireland, the Arklow congregation comprises approximately 100 members of all ages and nationalities. The hall extension is made available to a wide variety of community groups on the basis of a voluntary contribution, including for:

- Church meetings and bible clubs.
- Teens youth club once per week, catering for approx. 50 – 60 young people 'on a good night'. The club benefits from the professional services of a youth worker.
- Private Montessori school each weekday morning, catering for approx. 15 – 20 children.
- Arklow Mens Group – meeting two evenings per month approx.
- Speech and drama group – meeting once per week in the school year.
- Arklow Multicultural Association – meeting one weekend evening per month.

The Presbyterian Church has significant development plans, based on the current pressure on usage of their hall and worship area. Although at an early planning stage, with no specific project defined the congregation is discussing options to develop:

- Additional worship space for the growing congregation.
- Development of break-out rooms for age appropriate teaching of children on Sunday mornings.
- Development of a youth space, in the form of a redeveloped hall space for youth activities, church use and wider community use e.g. for older people and community groups, conference type facility.

Achievement of the proposed development plan is dependent on funding support from the Presbyterian governing body and external sources.

Masonic Hall

The Masonic Hall is located at Ferrybank and was constructed in 1902. A small two-storey hall (area not available), the building was renovated in recent years and is in generally good condition. The building is owned and managed under the provisions of a community Trust instrument. Available accommodation comprises a main hall, currently in full time (5 days per week) use as a community childcare facility, with dedicated kitchen and toilet facilities and a meeting room on the first floor dedicated to use by the Mason brethren. Operating at capacity at present, there is occasional availability of the hall for private booking for social events such as 21st birthday parties. The management committee reported that due to the recent listing of the building, plans to develop the hall have been postponed and no additional capacity for use by the community is envisaged over and above that currently provided.

Marlborough Hall

Constructed in 1878, the Marlborough Hall is owned and managed by the Church of Ireland in Arklow. Accommodation comprises a badminton court sized main hall with a stage, a kitchen, toilet facilities and a meeting room. The hall has limited disability access. The hall is used for Parish events, is rented up to 3 nights a week by a sporting group and used by a drama group in the afternoon. The owners have confirmed that the venue is used to the optimum capacity at present. Some requests for use by the community have had to be refused due to full capacity at peak evening times in particular.

Arklow Sea Scout Hall

The Arklow Sea Scout Hall opened in 1984 and is owned and operated under the terms of a Trust by the Arklow Sea Scout branch, on lands at Dock Road held under leasehold to Arklow Harbour Authority. The accommodation provided in the hall comprises a main hall, kitchen, toilet facilities and an upstairs room (called the Loft) where technical training takes place. External grounds include a 0.5 acre campsite with shower / changing facilities. As a thriving branch with a membership of some 200 young people aged between 6 and 17+ and a large waiting list to join, the hall is in permanent use by the different sea scout groups; including beaver scouts, cub scouts, sea scouts and venture scouts. The hall is also used one night per week by the Arklow Youth Marching Band, on the basis of need.

The management committee of Arklow Sea Scout Hall reported that they have received numerous requests for use of the hall by a variety of groups, but were unable to cater to these needs due to the existing pressures of use. Given the ambitious development plans of the committee to double

membership in the coming years, it is not anticipated that any additional capacity will become available in this venue in the future.

St. Colmcille Arklow Pipe Band – The Lar Cullen Hall

The Arklow Pipe Band constructed St. Colmcille's Pipe Band Hall in 1991 as a dedicated pipe band hall. The Arklow Pipe Band is a renowned local pipe band that won the World Pipe Band Championships in 2007 and currently comprises some 30 members. Located on a site immediately adjacent to the Castlepark public car park, the accommodation provided in the original 2-storey building included a main hall with kitchen and toilet facilities and a practice room upstairs. In 2007, an extension was built to the rear of the building to meet the growing needs of the pipe band, with an additional meeting room downstairs and upstairs being added to the existing accommodation. Usage of the building is largely dedicated to the membership of the pipe band. In addition to this use, the Meals on Wheels organisation sponsored by the HSE operate its services from the hall two weekday mornings per week and two weekly classes (exercise and martial arts) also use the hall in the evenings.

The management committee of the hall has confirmed that they have had to refuse accommodation to a number of groups in recent years due to the pressure of existing use and a consequent lack of availability. In particular, they highlighted a profile of an unmet need for young people from this experience. Following the recent completion of their extension project, the group has no current plans to develop the hall further in the foreseeable future.

Pigeon Racing Club Hall

The Pigeon Racing Club Hall adjoins St. Colmcille Pipe Band Hall in Castlepark. Built at the same time, the hall is of similar construction type, size and accommodation as the original Pipe Band Hall above. The Hall is used as a venue for the ICA Country Market on Saturday mornings. No respondent group stated that they met in the Pigeon Racing club hall and no further information on this hall was available to the authors at the time of writing this report.

Summary of existing accommodation use issues

The following issues were highlighted by the audit of existing accommodation carried out as part of the research:

- Six of the eight Arklow halls/centres reviewed were dedicated to a specific use and were not available for general community booking. However, most had provided accommodation to at least one additional user, on the basis of need.
- Just two of the halls/centres reviewed reported any level of additional capacity. The remaining halls reported that the hall was either already operating to its optimum capacity or was not suitable for additional use for another reason.
- Just one modern, multi-functional community space was found in Arklow that had additional capacity for general community booking. This accommodation was not considered suitable for specialist use such as for youth drop-in or performance use.
- A concentration of halls and clubs were located in the centre of the town just off the main street, with limited or no capacity to extend their footprint. No hall or centre reviewed had an external sporting, recreation or play area associated with it. One hall did have external grounds, dedicated to camping facilities and not available for any additional use.
- Halls/centres were not typically owned directly by the community and were most often owned under the terms of a legal instrument that specified a particular remit for the building to benefit a target membership or purpose for use.

- Just one of the 8 management committees of the halls/centres contacted had immediate plans to develop or extend the hall/centre to cater for future additional use (1 additional hall could not be contacted during the review). However, this hall - the Presbyterian Hall - had significant plans to upgrade the building for a variety of uses. It is recommended that any new centre be planned in consultation with the management committee of the Presbyterian Hall, to ensure appropriate synergies.
- Most halls/centres had limited disability access only and some had no facilities suitable for people with a reduced mobility or disability.

Analysis of Accommodation Needs

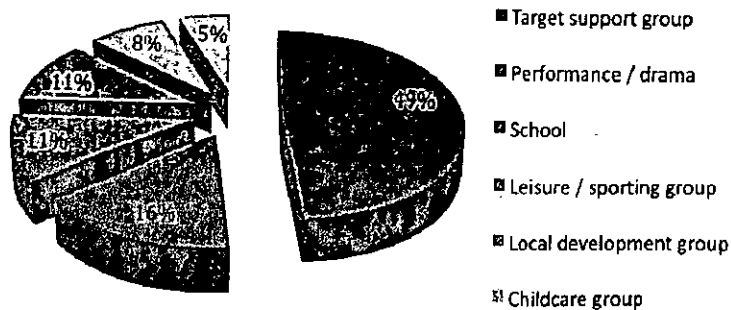
Survey of community groups

The main users of community space are community groups and organisations. In order to estimate the potential for future use of any new centre, the existing users of community accommodation in Arklow were asked to describe their accommodation needs and their future plans to rent accommodation. Some 80 organisations and groups listed in the Arklow Social Inclusion Network Directory and the Arklow Community Enterprise contacts database were sent a postal survey containing a series of questions on their profile as a group, use of accommodation in Arklow at present and an estimate of their projected future accommodation need. In addition, attendees at an event to showcase local community groups were also invited to complete a survey on the day. Generally, the survey was also well advertised in local Arklow shops and through a notice in local media. A significant number of groups indicated that the survey was not relevant to them, typically, either because they didn't require accommodation rental to deliver their service, or because they only utilised their own space. In all, over half of the community organisations for whom the survey was relevant (37 groups) provided a completed questionnaire detailing their existing and future accommodation needs. This response rate compares favourably with postal questionnaire completion rates generally. Principal results drawn from completed questionnaires have been summarised below.

Profile of respondent groups

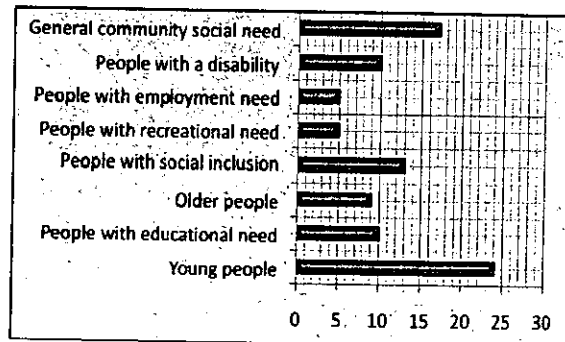
Respondent groups (37) mirrored the full range of groups currently serving the social, economic and educational needs of Arklow's population; including schools (4), leisure or sporting groups (4), groups serving a wide range of specific target groups e.g. older people, people with an addiction (17), childcare (2), area based or thematic (including unemployment support) local development groups (4) and performance groups (6). Among the target groups, disability groups (5) were strongly represented. No group charged commercial rates for access to their service and most were reliant on funding from fundraising or external sources in addition to their own membership/ client based revenue to deliver services. The affordability of accommodation was expected to be an important choice factor for all of these groups.

Chart 3: Main types of respondent groups



Groups were asked to nominate their target beneficiaries from a list provided and could select more than one client group. Thirty-seven groups offered a total of 93 responses. Many groups offered diverse services to one or more target groups, e.g. a youth organisation offered training to young people and also provided recreational opportunities.

Chart 4: Beneficiaries of accommodation rental by Arklow-based community groups

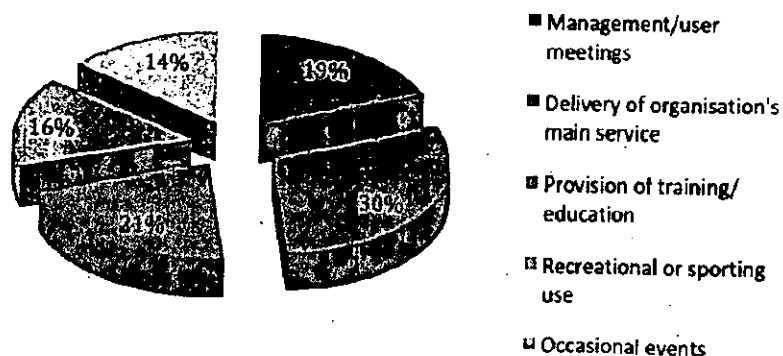


Over half of the respondent groups (56%) catered to clients living in Arklow town and the wider Arklow environs. The remaining groups reported that participants were travelling from further afield, from the wider east coast area (24% of groups) or from Wicklow and adjoining counties (21% of groups), providing further evidence of the important role of Arklow groups and organisations in serving a regional population. The average population size covered by groups was 11,333 (14 groups), while 26 groups had an average of 300 clients to accommodate in 2007. However, 50% of the respondent community groups provided services to 90 individual clients or less, suggesting that the most typical need is for space to accommodate 100 people or less at any one time.

Profile of respondents existing use

Community group respondents used two or more of the types of accommodation suggested in the survey (88 responses). The most commonly used existing accommodation type was a main hall (71% of cases), followed by use of a meeting room (53% of cases) and a kitchen (41% of cases). Existing access to an office space was relatively rare with just 6 groups availing of an office. Facilities for people with a disability were used by 11% of groups. Other specialist space listed included computer room, pitches, stage for musical and concerts (2 groups each). The purpose of use was equally diverse, 70 reasons for using the space were offered by 37 groups, dominated by use of existing accommodation to deliver the group's main objectives (58% of cases) and to provide training and education (42% of cases):

Chart 5: Respondents purpose for accommodation use (grouped)



The profile of accommodation use over different times of the day showed an increase in use of the main hall in the evening and a decrease in use of office space in the evening, as might be expected. Use of meeting room space was evenly distributed over the day. Although some seasonality was evident in responses, no clear pattern emerged – some groups had more need in the summer, while other groups took a break from their activities in the mid-summer months, indicating that seasonality may be readily factored into community space planning. The average amount of use per year reported by groups (32) was 100 days or less per year (50% of groups required 75 days or less), suggesting that each group used the venue approximately 2 days per week on average. Groups reported a wide range of hours per use – from 1 hour to 40 hours per week in 2007.

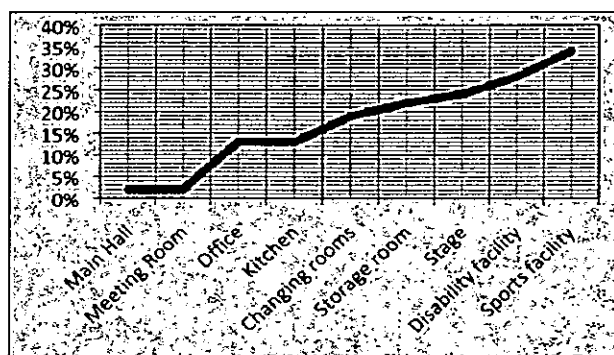
However, over half of the respondent groups (56%) used the venue for 6 hours per week or less in 2007, for an average group size of 25 people or less. Respondent groups were asked to state what rate they currently paid for their accommodation. Twenty-one groups provided figures, ranging from no charge (2 groups) to €60 per hour (1 group). The average amount paid by these respondent groups for the venue was €16 per hour.

Profile of respondents future needs

The vast majority of community groups at 80% of all respondents stated that they had an unmet future accommodation need, in addition to existing, satisfactory accommodation provision. This overwhelming response for additional need indicated both a high level of support for provision of new accommodation in Arklow among existing community groups and also suggested that a new centre has the potential to release a currently untapped accommodation need among these groups. Groups were asked to report the type of space that would be required to help them to achieve their development goals. All space types showed higher potential use levels, while some types of space use, e.g. disability, sports and recreation, performance, were strongly represented in terms of future need relative to existing availability.

The chart below describes groups reporting a future need, over and above their current accommodation use. More groups wanted more accommodation at the levels described below.

Chart 6: Positive difference between existing type of space used and projected accommodation type needed to achieve development goals (% of cases)



Seventeen groups reported a total of 179 hours of unmet accommodation need per week in 2008, for an average of 40 people per week - representing full capacity for a large sized, dedicated community building.

Twenty-three respondent groups were willing to pay €11 – €20 per hour for future community accommodation, within the range of the average cost per hour (€16) already paid by groups. Finally, groups were asked to prioritise unmet accommodation needs for development in Arklow more generally, from a comprehensive list of nominated potential uses. Responses represented an overall estimation of accommodation needs in Arklow for a wide variety of purposes and target groups, in addition to the previous descriptions of specific groups' own needs. Responses (from 1 least important to 5 most important) were added together and averaged, resulting in the following ranked list.

Table 2: Average rank provided by respondents for each type of accommodation need perceived in Arklow (1 = least important, 5 = most important)

Description	Respondents (%)	Average all responses
Need for social access space for young people	78%	4.62
Need for sports/recreation space	73%	4.56
Need for drama/performance space	76%	4.39
Need for general community meeting space	78%	4.17
Need for space for local development groups	78%	4.03
Need for social space for older people	78%	3.90
Need for training space	70%	3.69
Need for childcare space	70%	3.54
Need for space for medical/clinic use	70%	3.15
Need for space for use by state service providers	70%	3.15
Need for space for private event bookings	70%	3.12
Need for space for speciality use	70%	2.88
Need for space for small business use	70%	2.81

Most proposed accommodation needs were strongly supported by local groups, as further evidence of significant support among existing community groups of the need for additional community accommodation in Arklow in general. The right hand column ('average all responses') above represents the average for all responses where respondents were able to rank each choice presented in importance from 1 – 5, with 1 being least important and 5 being most important. As shown, all but two options received responses above the average of 3. However, it was notable that groups did not rank highly use that could potentially generate revenue for a community centre.

Summary of community group responses

- A high level of support for further accommodation in Arklow was evident in the analysis of completed questionnaires submitted by community groups.
- The profile of views identified dedicated space needs, for childcare, drop-in facilities for youth, disability facilities, active indoor and outdoor recreation.
- Evidence of latent potential need was clearly highlighted, the needs mainly stemmed from extended or new services proposed by existing groups for their clients and envisaged a growth in overall client numbers as a result of additional accommodation.
- A need to focus on socially excluded groups was highlighted by community group survey respondents. Typically, these groups were renting space from supporting organisations, were booking occasional commercial space or were 'borrowing' private space.
- Performance / drama needs represented an important local 'new use' type.

Future accommodation need

Demand from Arklow residents

Although a picture of existing and future need has been drawn from the responses of community groups and described above, it is difficult to extrapolate more generally to quantify the level of **currently untapped** community use that would be released by the existence of a new well-run, accessible and affordable community centre in Arklow. Demand is also a function of opportunity and some level of potential demand exists, for Arklow residents who do not meet, join a group or utilise recreational facilities at present, but who would do so if the opportunity was provided in the form of an accessible community building. A new community building would be expected to catalyse an additional demand by people not currently using a community space, through new membership of existing groups or by supporting the establishment of new groups.

The release of latent demand for accommodation from Arklow residents would be maximised if the quality of the building space was high and a transparent community centre management supported a role for the centre as an advocate for the groups using it. A review of the literature supports this case, but it is not possible to quantify latent increased demand as part of a feasibility analysis. However, this question was put to the centres that were contacted as part of the comparative analysis described in more detail below. The responses included the following: (a) A steady increase in absolute numbers of user groups and user group membership was reported; (b) a majority of halls/centres had refused significant volumes of additional use arising from new requests, due to either a lack of suitability or a lack of availability of the venue in particular at peak, evening, times. Some measurable factors relating to a projected absolute increase in Arklow's population predict an increased future demand for community facilities in addition to an increased potential existing demand already described.

Increased demand from future Arklow residents

The revised Wicklow County Settlement Strategy published by Wicklow County Council projects Arklow's population to rise to 21,000 persons by 2016 or an increase of approximately 80% over the current population size. This projected increase follows a similar pattern to that observed over the previous 15 years. A number of practical impacts for community groups renting community space are anticipated from this continuing demographic trend:

- Social inclusion groups will increase in terms of numbers, size and levels of activity and the current economic recession¹³ will increase social inclusion needs in the immediate term.
- The numbers of young people with social drop-in type space needs already identified will grow in number and in terms of the social integration challenges they face.
- The number of immigrant non-national residents may be expected to grow in number and to require particular social inclusion supports.
- Groups that address social needs and currently meet in smaller venues, e.g. pubs, houses of family members etc. may be expected to find it increasingly difficult to continue to use these venues due to larger numbers.
- The trend towards higher expectations for community accommodation and more specialised types of accommodation envisaged in the community group survey will increase.
- The existing multi-functional community venues may not be able to meet community accommodation needs, particularly at the peak demand times - evenings, summer periods.
- The standard of some existing dedicated accommodation would continue to decline in the absence of development goals and opportunities.

Selected Case Studies

As part of the research, the authors reviewed a small number of other equivalent community centres elsewhere, to:

- Examine the nature of provision of community space in a small number of sample communities.
- Transfer key learning from other communities with respect to developing a capital building project
- Identify the main benefits and outcomes of capital developments in equivalent communities.

Two recent construction projects, St. Joseph's Hall Blessington (Youth Café) and Santry Community Centre have been presented as case studies below. An additional two community centre venues were reviewed specifically for good practice with respect to; (a) design quality and construction costs and, (b) annual operating revenue and expenditure and have not described here in full.

¹³ ESRI, June 2008

Case Study 1: Santry Community Centre

"From little acorns great oak trees grow..." (Santry Community Centre)

In 1977 Santry community centre committee started collecting £1 from each household in Santry to construct a new community centre. At the time, Santry consisted of approximately 650 households. This initial fundraising effort collected £45,000, but the project failed to get off the ground at that time.

Thirty years later, Santry had grown to a community of more than 6,000 people (estimated at present to be closer to 8,000 people). To explore a perceived need for accommodation, a questionnaire was sent to all the different groups in the area. Survey responses highlighted a need for space for a youth club, a ladies club, active retired association, a dance studio, aerobics studio and a playschool.

The project planning and development process involved discussions with Dublin City Council and with Fingal County Council since the land the community wanted belonged to Fingal. At this time, Woodford Development Ltd. wanted to develop a local residential area containing an important mature woodland. The developer liaised with the community and a strategy was agreed to develop the woods in partnership. Through this strategy, Santry gained a 78-acre park, along with €200,000 to help build a community centre. Further negotiations with Dublin City Council led to agreement for construction of a centre in conjunction with construction of 21 sheltered houses for older people.

"We always had the backing of our community but over the years this ebbed and flowed. One of our members motto was "BUILD IT AND THEY WILL COME", he was completely right, from the time we opened our doors in May 2007 we haven't looked back."

The cost for the building design, planning and construction was approx. €1.4 million, with an additional loose fit out cost of approx. €200,000. A mix of volunteers, paid staff and CE (FAS) scheme staff operate the centre. The management group for the centre involves representatives of housing estates in the area. The centre operates as a not-for-profit limited company with two Directors, one from Dublin City Council and one from the management committee.

The centre has been operating at close to full capacity since 2007 and accommodates a wide range of groups and activities, including, a play group, youth club, ladies club, kick boxing, salsa dancing, line dancing, aerobics, Unislim, bowls, movement to music for older adults, St. Michael's house and Tai Chi. Rental of an upstairs room to an art school has proved important in generating operational revenue.

In 2008, 135 children participated in a summer project organised directly by the centre staff and management, representing a significant increase in participation from the previous year, when 70 children participated. This successful project demonstrated the way in which the centre has directly facilitated delivery of new services in the community.

"The most important thing is to find a good manager. It would be best if you could find someone from the locality who has a great interest in the centre and who would give it their all. We hope in the near future to extend upward and we made provision for this in our original plans"

Case Study 2: 'd' Caf' Youth Café, Blessington

St. Joseph's Hall Management Committee has managed St. Joseph's Hall on the Main St. in Blessington since 1950. St. Joseph's Hall is a parish-based community facility operated under the terms of a lease with the owner – the St. Laurence O'Toole Trust. In 2003, the Committee engaged in a consultation process with the local community to ensure that the Hall was being used in a way that best met the needs of the community. During this consultation process with individuals, local schools and groups in Blessington and surrounding areas, identified an unmet need for services and facilities for young people.

In 2005, St. Joseph's Hall Management Committee received LEADER+ funding towards the costs of renovating the rear section of St. Joseph's Hall as a Youth Café/Drop-in Centre. The Centre comprises an activity room for young people with entertainment equipment such as PCs and DVD players, a kitchen with a small café area attached (which is also used by those using the main Hall), a small storeroom for equipment and upgraded toilet facilities available to users of both parts of the Hall. The Centre officially opened in April 2006 and is the first such facility in County Wicklow.

While St. Joseph's Hall Management Committee maintained overall responsibility for the Hall following the establishment of d' Caf, volunteers from two local Youth Groups – Blessog and Foróige, undertake the day-to-day running of the new youth café. The Centre caters for approximately 25 young people per evening and the centre is usually open between 3 and 6 evenings per week at a nominal cost to young people. Staffing remained one of the biggest issues the project has faced since its establishment.

An evaluation of the project completed by KW Research Ltd. in 2006, concluded that the centre "provided a safe place for young people to be, and removed the risk of them "hanging around street corners" where they would be at risk of anti-social behaviour."¹⁴ The consultants identified the following direct and indirect benefits of d' Caf to local young people and to the community as a whole:

- Safe environment for young people
- Increased capacity – by developing key social and technical skills and know-how in young people
- Sense of achievement
- Sense of identity and ownership
- Self-esteem
- Enhanced community relations and facilities available to the entire community, e.g. senior citizens using the centre during the day.

¹⁴ KW Research & Associates (2006) *Exploring the Impact of LEADER+ Support for Women and Young People in County Wicklow*, unpublished report, Wicklow Rural Partnership Ltd.

Countywide study of community facilities

In 2006, a countywide study of the views and development needs of community centre management committees was commissioned by Wicklow County Council and Wicklow Rural Partnership and undertaken by the authors.¹⁵ In summary, the study suggested that a proactive management committee that aligned its mission closely with local community needs and planned future building developments on this basis enhanced the sustainability of the community centre in support of revenue generation.

A New Community Centre for Arklow

Views of public workshop participants

At a public workshop held on 7th April, Arklow residents contributed to the debate on the need for a community centre in Arklow. Workshop participants described what mattered to them about the types of accommodation nominated by community groups in the surveys and offered their stories about why these things were important to them:

What matters about leisure space?	Why do these things matter?
<ul style="list-style-type: none"> Central area to be accessible for all indoor sports, e.g. indoor soccer, badminton, volleyball etc. Space to be adaptable to a variety of sports. Space to be multifunctional for all community needs. Shower facilities are important. Soundproofing is important. Good acoustics are important. Good lighting is important – natural and artificial. Storage is important for sports and stage equipment. Bowls for older people is important, with a wheeled storage unit. Bowling for families, friends, parties is important. Electronic scoreboard is needed for basketball. Dressing rooms are important. 	<ul style="list-style-type: none"> Because taking part in sports and being part of a team is important for young people, teaching discipline and life skills. Sports encourages participation and involvement – you get out what you put in – in turn, players give back to sports by coaching themselves. Basketball is a serious sport in Arklow – the Arklow C.C. U16 basketball team are Bronze All Ireland Cup Medal winners in 2008. This team has no current hall. Dept. of Educ. has development stage plans. Sport space is very popular wherever it is accessible.

¹⁵ Pritchard, R. and Sheehan, E. (2007) *The views and development needs of management committees of community halls and centres in rural Co. Wicklow*, unpublished report, Wicklow County Council and Wicklow Rural Partnership.

What matters about facilities for older people, people with a disability, etc.?	Why do these things matter ?
<p>It's important that facilities are affordable</p> <p>It's important that facilities are owned by the community</p> <p>Accessibility is an important issue for these groups, ramps, lifts, ground level facilities, clear passageways</p> <p>Parking is important for both cars and buses</p> <p>Recreational facilities for dancing, exercise are important</p> <p>Kitchen facilities are important</p> <p>Storage space for equipment is important</p> <p>It's important that facilities for older people, people with a disability etc. allow integration with other community members</p> <p>Quality of sound is important in the facilities for older people</p>	<p>These groups have a reduced mobility</p> <p>These groups are reliant on transport to get to the venue</p> <p>Older people can experience social isolation and need access to social activities</p> <p>Older people, people with a disability have a need to communicate, to share ideas and to network</p> <p>Facilities are important because they improve physical and mental health for these groups</p>

What matters to young people about community space?	Why do these things matter ?
<p>The space should be a place to integrate</p> <p>It matters that the space isn't boring or dull – painting and décor are important</p> <p>The space should be comfortable</p> <p>It matters that young people have a sense of ownership of their space, that they feel a certain sense of freedom in it</p> <p>It's important that the space allows for self-expression, e.g. through a graffiti wall</p> <p>It matters that sporting facilities are available – e.g. basketball court, indoor soccer space</p> <p>A youth facilitator is important with the facility</p> <p>Music, media, performance, drama facilities are important for young people in the space: let's find Arklow's very own 50 cent!</p> <p>Facility to deliver e.g. JC/LC education programmes is important</p> <p>Internet enabled computer equipment is important for young people – also should have interactive whiteboards for educational programmes</p>	<p>So that young people can feel at ease and not confined</p> <p>As Ireland becomes more ethnically diverse, integration is very important for young people</p> <p>There are newly resident teenagers in Arklow who have nowhere to meet with local teenagers, apart from school.</p>

What matters to the community about general community space?	Why do these things matter?
<p>The space should be affordable, available to book at any time.</p> <p>It matters that the facility is owned by the community.</p> <p>It matters that the meeting spaces are capable of taking small and large groups.</p> <p>It's important to have a kitchen, meeting rooms, a hall.</p> <p>There should be suitable equipment for presentations – e.g. data projector, screen, microphones etc.</p> <p>The community space should allow for evening use, e.g. for 'drop-in' by young people.</p> <p>The community space should feel welcoming.</p> <p>It matters that there be affordable, flexible childcare available in the community space, e.g. baby room, toddler room, playroom, kitchen, sleep area, outdoor play space.</p>	<p>So that the community can easily use the space.</p> <p>Because Arklow needs a space that accommodates a wide variety of use (Re: childcare space) because there are insurance restrictions, floor space regulations.</p> <p>So that parents childcare needs can be accommodated, for lone parents, to allow parents to retrain, work part-time, take timeout (stress); for out of school hours childcare while parents work.</p>

Building concept principles

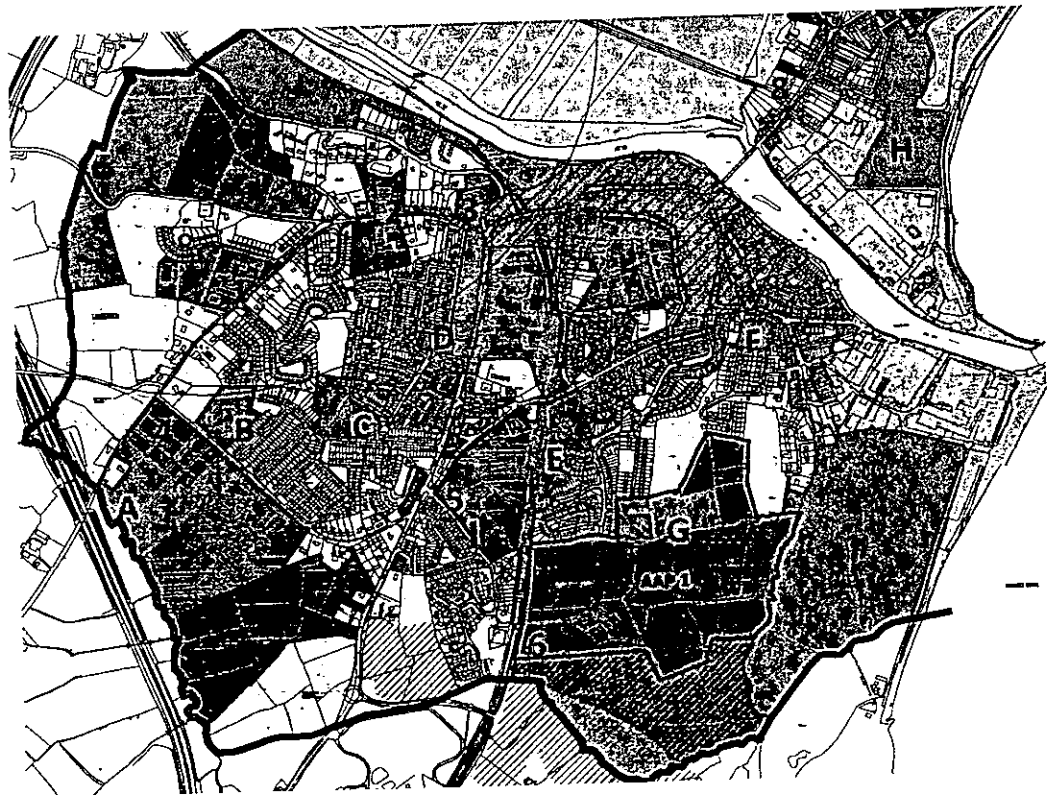
The community vision for a new community centre was analysed further to define the preferred building concept and design. The consultants have proposed that a large sized community space comprising a mix of dedicated space with general social use was the option most suited to the views, values and needs of Arklow based community groups. In arriving at a possible design, the essential principles highlighted through the desk study, audit and comparative analysis were applied. In accordance with these principles, the space should (be):

- Accommodate Arklow community groups on the basis of a 'lifecycle approach' in keeping with the social inclusion principles outlined in the National Action Plan for Social Inclusion 2007 – 2016.
- Adaptable and flexible – to accommodate different types of use over time, with variable sized spaces.
- With easy circulation – a building that is easy to navigate with a simple circulation system and multiple emergency exits which would allow for quick and easy escape in case of fire.
- Future-proofed – to be energy efficient and capable of being extended in future building phases.
- The highest quality affordable by the community – to be sustainable over time, to include appropriate equipment.
- Accessible - to be used by people with reduced mobility, to provide adequate storage, to include sufficient car parking.
- Correctly positioned and landscaped to permit full community access, while being securable.
- Designed to reflect the culture and history of Arklow - a design that is modern and that takes a holistic approach using local and sustainable materials.
- Financially viable – as debt-free as possible, with consideration given to staff operational costs and capable of being hired by the community at relatively low cost.

Analysis of potential building locations

The Arklow Development Plan 2005 – 2011 designated a number of specific locations for the future development of community facilities. These locations offered an initial shortlist of potential sites, which were then further examined by the research team in consultation with the Manager of Arklow Community Enterprise and the Town Clerk at Arklow Town Council. The preferred option was then compared with the Local Authority Development Plan to ensure a good fit with the criteria and strategic principles of the overall Plan. It is important to note that other possibilities to locate the centre not available at the time of the study preparation e.g. through private land donation/exchange, by re-developing an existing facility or by co-locating on an existing site may become available as the project is further defined.

Figure 2: Map of possible sites



Areas designated for community facilities

1. Community College
2. St Saviours
3. Boys School and CBS
4. Cemetery
5. Carysfort School
6. Gael Scoil /Gael Cholaiste campus
7. St Mary's and St Michael's Schools
8. Methodist Church

None of the areas highlighted in blue were considered as potential sites for a community centre as the majority of them were established educational/institutional facilities.

Areas designated as open space

- A. Arklow Celtic/Arklow Rocks Parnell GAA/Arklow Boxing Club/future site for National Wheelchair Association
- B. Arklow United (and temporary Gael Scoil)
- C. Marian Villas - 50 houses planned on site
- D. St. Peters place - playground and parking planned for site
- E. Churchview
- F. Behind Blackberry Glade – site prone to flooding
- G. Landlocked site - landowner issues
- H. Amenity area with swimming club/leisure centre/running track/Sli na Slainte/Pitch & Putt/playground. Future developments by Arklow Town Council pending in this area
- I. Football pitch beside Carysfort – owned by Arklow Town Football Club

Many of these sites were owned privately or by an existing club and would require a negotiated legal transfer and/or payment to enable the construction of a community owned facility. Some of the locations were considered to be unsuitable for other reasons, because the land was unsuitable for this type of development or because of other developments prioritised for the site. Among the open space highlighted areas, the site that did not have an existing use, was easily accessible and large enough for a community centre was the Churchview site (E).

Development potential of Churchview site

On the Arklow Development Plan 2005-2011 in the zoning map, the proposed Churchview site is highlighted in green, which denotes open space. The development plan has the following objectives in relation to open space: *“Open Space: To preserve and provide for open space and recreational amenities”*. In the zoning matrix table, a community facility in an area zoned open space is considered open for consideration (O): *“Land uses designated as “Open for Consideration” are uses that may be permitted where the Planning Authority is satisfied that the proposed development would be compatible with the overall policies and objectives for the zone, would not have undesirable effects, and would otherwise be consistent with the proper planning and sustainable development of the area”* A recreational facility/ sports club is considered ‘Permitted in Principle’ (P). *“Land uses designated under each land-use zoning objective as “Permitted in Principle” are deemed to be generally acceptable, subject to compliance with the relevant policies, standards and requirements set out in this Plan”*.

Figure 3: Location of proposed community centre

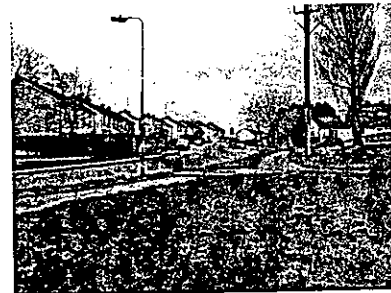


The proposed site at Churchview is located in the centre of Arklow town close to the railway station and both national and secondary schools. It is easily accessible from the main street on foot. The site is located on the Yellow Lane, a road that links the Lower Main Street with the Wexford road. The site boundary to the east is the railway line and beyond this are commercial and industrial buildings. The Navy Bridge is to the north of the proposed site. To the west of the site is Rory O' Conner place which is an existing and well established housing estate and the south of the site is bounded by the Churchview housing estate. The Churchview site is situated in Urban District No. 1.

There is an existing pedestrian path that runs around the perimeter of the site. This links the Churchview housing estate to the Yellow Lane and there is street lighting on this side. The site is relatively flat in the middle but slopes upwards towards the Navy Bridge and towards the rear of the site.



View of Site towards Navy Bridge



View from Site into Churchview housing estate

Access

The site can be accessed from Churchview housing estate but this would not be considered a suitable access point for a community centre, as it would disrupt the existing residential neighbourhood. A more suitable access point would be at the junction of Rory O'Connor place and the Navy Bridge (shown below). Due to the proximity of the access point to the junction and the location of the junction opposite, a roundabout might be considered suitable in this location. There appears to be a wide unused area close to the Griffith Street junction so no additional land would be required for this (see below).



Junction at Yellow Lane and Rory O'Conner Place



Junction at yellow lane and Griffith Street

Concept

From the public workshop, a brief and a schedule of accommodation was developed capable of being constructed within the proposed Churchview site footprint.

Proposed schedule of accommodation

The following schedule of accommodation provides an indication of the minimum accommodation requirements for a new community centre in Arklow. It is anticipated that an external equipped play space would also be required.

Table 3: Schedule of accommodation

Room Description	Function	Dimensions (m)	Area (sqm)
Main Hall	Multifunctional Dividing screen Foldable stage and seating	15 x 25	375
Kitchen	Modern and well equipped Situated to provide ready access to youth cafe and meeting room 1	7 x 7	49
Changing Rooms (2)	Male and female	6 x 4	48
Toilets (2)	Male and female and wheelchair accessible	5 x 7	70
Youth cafe	To cater for approx. 35 young people and located beside kitchen to share facilities	7 x 7	49
Meeting Room 1	To cater for at least 35 people and opening out to kitchen to double potential capacity	7 x 7	49
Meeting Room 2	To cater for at least 35 people	7 x 7	49
Meeting Room 3	To cater for at least 35 people	7 x 7	49
Storage	Lockers for individual users	5 x 7	35
Reception and circulation	Light filled, spacious gathering point to cater for large numbers gathering with space for receptionist	Irregular	150
Childcare facility	With own kitchen and toilets	13 x 7	91
Office	Near main reception area	4 x 4	16
		Total:	1,030sqm/ 11,086sq ft

Future phase additions

Proposed future additions / extensions include a shop, an IT Centre and dedicated space for rental to e.g. performance studio. It should be noted however, that the footprint of the site and the building proposed would require future extensions to be built as a second storey over the existing accommodation. It is recommended that this possibility be factored into the roof design. An external area to the rear of the proposed building might be suitable for e.g. performance space in addition to use of the main hall for this purpose, however this area would be limited.

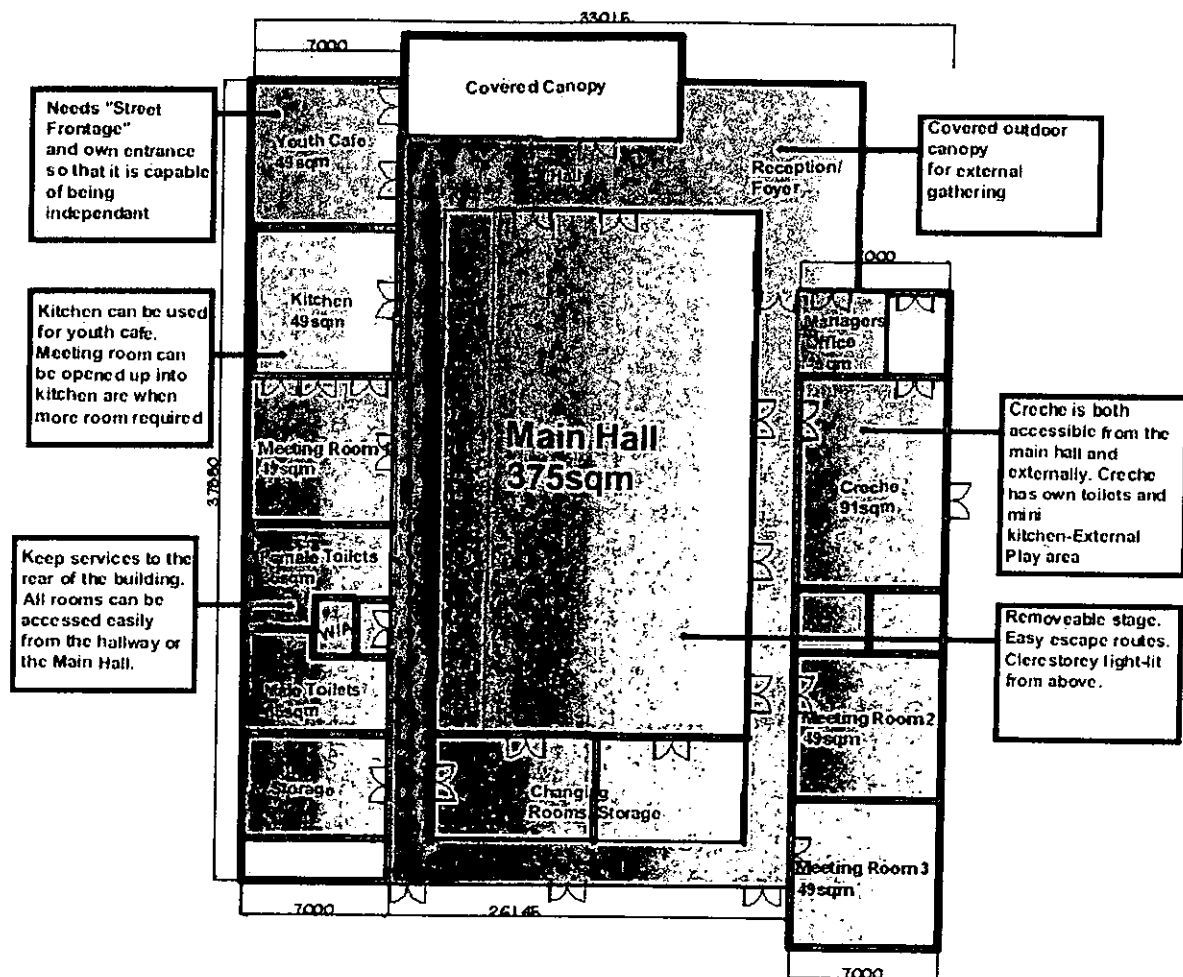
Car parking

In the Arklow Development Plan 2005-2001 the standards set out for car parking do not define the number of spaces required for a community centre. Under the Amuse/ Entertain/Museum planning category, 4 car spaces per 100sqm are required. If this is applied also to community facilities category, a 1,030 sqm community centre would require 40 spaces. However, this is considered to be too few for a community centre of this size and a minimum of 70 spaces, to include wheelchair accessible spaces as well as bicycle and bus parking facilities are recommended.

Figure 4: Conceptual view of building ca. 1000-1200sqm on selected site (not to scale).



Figure 5: Conceptual sketch of proposed community centre (not to scale)



Indicative building cost

The RIAI Guidelines for building costs (RIAI, 2006) indicate a construction cost for industrial scale buildings of between €900-€1350 per square metre, together with office fit out costs ranging from €1,650 - €2350 per sqm. On this basis, a community centre of the size proposed, would cost in the range of €927,000 - €2,420,500 to construct. Assuming an average cost within the range, a provisional indicative building cost for a new community centre in Arklow including the accommodation proposed, would cost ca. €1.67 million. This cost has been calculated to include a basic fitout but excludes furnishing and external landscaping. A high quality kitchen could add €50,000 to the total cost, provision of a maple floor in the main hall could cost an equivalent amount. It should be noted that these prices are provisional estimate based on good practice guidelines, are subject to a wide range of design decisions and should be more accurately estimated by a quantity surveyor as part of a formal tendering process.

Management issues

Legal entity

Having reviewed a variety of organisational structures existing in the county and elsewhere, the recommendation of the authors is for the new community centre to be established as a not-for-profit incorporated legal entity (a company limited by guarantee, with no shares). Such incorporation provides the organisation managing the centre with a separate legal status that will:

- Protect members from liability for the organisation's debts or activities
- Provide continuity
- Allow the organisation to enter into contracts in its own name (including staff contracts)
- Allow the organisation to bring or defend court actions
- Fulfil the possible requirement of funders¹⁶

Management principles

The overall social and financial sustainability of a community centre is dependent on a clear commitment by its Board to achieve the full range of its role as a service provider in the community. The community envisages a new community centre in Arklow as:

- A multi-user community centre that is a visible advocate in the community for the groups/organisations/activities it accommodates.
- A single 'one stop shop', facilitating new community groups and helping to promote new ideas, new thinking and supporting social integration.
- Playing a key role in promoting mutual respect and co-operation between the groups that use it.

Role of the Board

To achieve the full potential of the community centre, the following operational issues should be considered:

- The Board must play a key role in agreeing a holistic long-term mission for the community centre. Good governance requires the Board members to be clear about their roles and responsibilities and to operate in a transparent way.¹⁷
- The centre must be available and accessible at times when the community requires it – e.g. opening early and closing late.

¹⁶ Ellis, D. (2006) *Are you keeping good company?*, unpublished presentation; Committee Management Skills Training Programme, Wicklow Rural Partnership Ltd.

¹⁷ Anon. (2006), *The Case for Better Community and Voluntary Sector Governance in Ireland*, unpublished report, Boardmatch Ireland.

- An appropriate staffing structure will be critical to operational success. For a centre of the size proposed, it is estimated that 1 full time manager will be required, managing a team of approx. 2 people to deliver basic centre services. Additional project staff, e.g. for childcare may also be required.
- Ensuring regulatory compliance to run a community centre requires a significant amount of training and development by both Board and staff members. For example, documentation such as a Building Policies Manual will be required. Funding should be included within the operating budget of the centre to provide for this training.
- Research on costs of community centres in Wicklow has highlighted the significance of energy as an operational cost. Serious consideration should be given to energy conservation (e.g. proper insulation, constructed with a southerly orientation), energy cost proofing over time (e.g. careful selection of energy systems) and energy monitoring (e.g. individual space metering and development of a 'green building' policy).

All of these measures will support the operation of a sustainable community building and will also reduce energy costs over the medium term.

- It is likely that potential funders may require financial forecasting for up to 3 years of centre operation. The Board will be required to establish the proper budgeting and accounting procedures that demonstrate their capacity to manage a capital development project.

Financial issues

The following typical centre operating costs have been provisionally estimated overleaf¹⁸. These do not represent a formal budget for the centre and the project development group should prepare an appropriate budget once the building design has been finalised. In addition, this budget does not factor in potential revenue from long-term rental – e.g. if a shop or small business is located in the centre. Turnover is expected to reach approx. €250,000 per annum. An example budget at a conservative level is shown below, demonstrating typical cost elements. The sample budget below assumes that:

- (1) The centre includes a childcare facility that brings in rent and covers project staff costs.
- (2) The centre is successfully operating at an optimum capacity.
- (3) Staffing costs are covered by external grant income.
- (4) Initial computing and other equipment costs are assumed to have been covered in the initial capital development project.
- (5) No operating profit has been projected.
- (6) External grant income allows the centre to be sustainable.

¹⁸ This represents an initial provisional estimate for comparison feasibility purposes only – a full budget should be prepared when the community centre design is confirmed.

Table 4: Example of community centre budget

Description of example cost	Expenditure €	Income €
Income from rental		70,000
Grant income		142,500
Wages and salaries	120,000	
Capital development fund	9,200	
Board / staff training	5,000	
Insurance	5,000	
Waste charges	500	
Computer costs	4,000	
Catering	3,000	
Light and heat	8,000	
Repairs and maintenance	5,000	
Printing, postage and stationery	300	
Advertising, marketing	4,000	
Telephone	1,000	
Production costs (theatrical)	7,000	
Accountancy fees	4,000	
Audit fees	3,000	
Bank charges	500	
Travelling & entertainment	500	
Web design	3,000	
Printing, photocopying, stationery	500	
Water charges	4,000	
Depreciation (property & equipment)	25,000	
Totals:	€212,500	€212,500

Relevant Support Organisations and Resources

In addition to the wide range of community organisations and initiatives being implemented in Arklow, the following organisations may have specific funding or technical supports available for the construction and establishment of a new community centre in Arklow. It is not intended to constitute a definitive list of potential partner organisations and future eligibility criteria, rules and conditions of programmes may change over time.

Wicklow County Council

As outlined in the Revised Wicklow County Settlement Strategy, Wicklow County Council plans for population growth in County Wicklow in line with the principles of the National Spatial Strategy (NSS) and Regional Planning Guidelines for the Greater Dublin Area 2004-2016. The Community and Enterprise section of Wicklow County Council works in conjunction with all departments in Wicklow County Council and with the membership of the County Development Board to support the development of Local Authority policies that respond to the needs of Wicklow communities. Potential supports for the development of a new community centre co-ordinated by Wicklow County Council's Community and Enterprise Section include; development and advocacy advice, support for fundraising under national schemes co-ordinated through Wicklow County Council (e.g. Dept. of Environment, Heritage and Local Government initiatives), access to community grants offered directly by Wicklow County Council and with respect to the allocation of the community elements of the Development Contribution Scheme.

In May 2008, WCC held an event to launch the results of the countywide study of community halls and centres. At this event, an allocation of significant funding for the development of community facilities in Wicklow from 2010 was outlined.

Arklow Town Council

Arklow Town Council (ATC) is the Local Authority, with responsibility for the full range of services for citizens of Arklow – including town planning, housing, roads and other essential services. As a Town Council, Arklow forms part of a network of town councils, co-ordinated by Wicklow County Council. Support from Arklow Town Council will be critical to the development of the project, particularly in terms of regulating for and guiding the planning, design, construction and landscaping of the overall project.

County Wicklow Partnership

Under the Local Development Social Inclusion Plan (LDSIP) for 2000-2006, Partnership Companies operated only in areas of greatest disadvantage. In 2007, the Department of Community, Rural and Gaeltacht Affairs implemented the recommendations of a 2003 review of community and local development structures. This review recommended that structural cohesion of local development structures nationally would lead to improving on the ground services, streamlining, bring transparency, co-ordination and improved financial and operational controls, with strengthened democratic accountability.¹⁹

¹⁹ Summarised from web source: Department of Community, Rural and Gaeltacht Affairs website *Statement on Cohesion Process*, published on 19th September 2007.

The cohesion process means that in the next LDSIP, under the 2007-13 NDP, Partnership Companies will operate in all parts of the state. The justification for this extension of the geographic coverage of Partnership Companies is that disadvantage and social exclusion exist in all parts of the state, even in areas where most people are not disadvantaged, and that the services of Partnership Companies should be available to all people who wish to access them, wherever they live.

In Wicklow, the cohesion process has involved the amalgamation of three existing local development companies, Arklow Community Enterprise and Wicklow Working Together (both Community Partnerships operating the LDSIP) with Wicklow Rural Partnership (operating a range of rural development programmes, including the LEADER programme). The newly established County Wicklow Partnership offers the Arklow community an opportunity to look for an integrated response to the need for a new community centre in Arklow and may be an important source of advocacy support and financial investment. In particular, the Local Development Social Inclusion Programme and the Community Services Programme, may support staffing needs. County Wicklow Partnership will administer both of these programmes.

Arklow Chamber of Commerce

The Arklow and District Chamber was established in 1937 to support and promote business in the south of the County. In 2008, Arklow Chamber represents the needs of 90 member companies, comprising manufacturing, retail, tourism and other services. As a member of the Wicklow Chamber, incorporating all 4 local Chambers - the Arklow Chamber provides advocacy, information/promotion, training and networking opportunities to benefit local member businesses.

As part of its community engagement, the Arklow Chamber is a relevant source of information and support to Arklow based community groups. In particular, Arklow Chamber is a potential partner in supporting a role for any new community centre to encourage social economy initiatives, promoting an enterprise culture in the community and could usefully broker relevant sponsor relationships with local industry in support of a viable capital development project.

Co. Wicklow VEC

County Wicklow VEC (CWVEC) is the statutory education body for the County of Wicklow. The organisation caters for 4,386 second-level students in 11 schools and an estimated 4,500 adult learners. Co. Wicklow VEC operates 1 Institute of Further Education in Wicklow and provides Post Leaving Certificate courses for almost 1,000 students. In addition to provision of education opportunities to particular target groups (e.g. travellers, prisoners), County Wicklow VEC supports activities for young people, through its Youth Service. In Arklow the VEC supports the East Wicklow Youth Service, the Arklow branch of the Catholic Youth service. In Arklow, the CWVEC operates: Arklow Community College - a second level school with approx. 400 students also offering Post Leaving Cert courses, and; the Arklow Adult Education Centre, providing adult education courses to adult learners.

FÁS

FÁS is the statutory agency with responsibility for offering advice and training to unemployed persons seeking work in the state and operates the Community Employment Scheme. FÁS also provides community based employment and training programmes to make learning accessible in local areas and in Arklow operates a Local Employment Services Office from government buildings in Castlepark.

FÁS also operates a jobs club sponsored by Arklow Catholic Parish Church that offered practical advice and assistance in finding a job to approx. 300 clients in 2007 from the Arklow Boys National School located on the Coolgreaney Road. The Community Employment Scheme operated by FÁS is an important source of staff funding for Wicklow community halls/centre management committees. The criteria for participating on the Community Employment programme are based on age and length of time in receipt of various social welfare payments. In general, the part-time Integration option is for people of 25 or over who are receiving social welfare payments for 1 year or more, and people of 18 years or over in receipt of disability-related payments. The part-time job option is for people who are 35 or over and in receipt of social welfare payments for 3 years or longer. This scheme may be a potential candidate for staffing any new community centre in Arklow.

Wicklow County Childcare Committee

Wicklow County Childcare Committee (WCCC) was set up in June 2001 with an objective to support the expansion in the quantity of childcare places and the quality of childcare provision in County Wicklow. WCCC provides advice, training and support to childcare providers and childminders and in particular, coordinates the National Childcare Investment Programme that offers capital and staff funding for new childcare facilities in areas of significant local need. The WCCC has prepared the ground in 2007 and early 2008 for the main rollout of the programme. Although Arklow UD No. 2 was considered to be well provided for, any planned facility in Arklow UD No. 1 may be able to target the NCIP for support. The Churchview site identified in the study, is located in Urban District No. 1.

Conclusions

In the previous sections of this study report, a case has been made for the feasibility of a new community centre in Arklow based on:

- Analysis of the social development context, including evidence of social inclusion demographic trends.
- Review of the planning context and the 'fit' between the project and the development priorities of Arklow Town Council.
- Evidence of existing community accommodation need and in particular, evidence of a need for specialist facilities for, e.g. young people, for childcare, for people with a disability. Also, for recreational use such as basketball and for performance use.
- Indicators of current untapped community need – reports of increasing membership from existing groups, as well as a reported lack of capacity by existing community facilities to accommodate some groups seeking accommodation.
- Indicators of future need, including higher expectations of local people for community accommodation and projected absolute population growth, as well as an expectation that social inclusion needs will increase together with population growth.
- Reports by existing generalist community halls and centres about their development plans and a view as to a lack of capacity to cater for additional and/or specialist need due to the size, condition and/or remit of the hall/centre.
- The availability of supporting organisations and resources as potential partners in any Arklow based development project.

In addition, the report has demonstrated that a potential location for the community centre exists that is readily available for development. The research also indicated the approximate budget and other resources required for a building project, based in part on a review of similar centres elsewhere. A case has been made for the establishment of a dedicated project development group and an incorporated centre management organisation. It is important to note that the remit of this feasibility study was largely limited to the need for the development of a new facility in Arklow, Co. Wicklow – the feasibility of long-term operation was not specifically included in the research. Based on these, some recommendations for next steps have been proposed, included as an appendix to this report²⁰.

²⁰ Cooke, S. (2006) *Developing Effective Community Facilities*, Wicklow Rural Partnership Ltd. and Wexford Organisation for Rural Development.

Appendix 1: Recommendations for Next Steps

Ensure community support

- Publish feasibility study for community review.
- Provide form for feedback on the document – use the form to ask groups and individuals to ‘sign-up’ to the project.
- Hold key stakeholder meeting and invite all relevant potential partner organisations to view study outcomes.
- Prepare summary promotion leaflet or postcard for public maildrop and response.

Establish a partnership project committee

- Invite interested Arklow residents to establish a project development committee.
- Actively seek to include the skills that will be required, possibly by co-opting local expertise such as; local development, architect, engineer, financial accountant, marketing professional.
- Include key stakeholders from ATC, WCC, local development agencies, VEC on committee.
- Include local business leaders.
- Include future user group representatives.
- Explore the potential to ‘twin’ the centre development with another centre elsewhere.
- Formally announce and ‘launch’ project and project group, invite all potential user groups to attend.
- Establish ongoing promotion campaign, prepare media pack and use all available local publicity options.

Develop a project management plan

- Review legal incorporation options and agree timeframe for incorporation.
- Explore charitable status opportunities.
- Develop organisational structures, e.g. overall management committee, planning / design sub-group, finance sub-committee, promotion sub-committee etc.
- Prepare a 2-3 year project management plan based on SMART objectives, e.g. Specific, Measurable, Achievable, Realistic and Time defined.
- Employ Architect to prepare Terms of Reference for building tender.
- Employ Quantity Surveyor to prepare building construction costing.

Secure investment support

- Use the funding bulletin available from the website www.citizensinformation.ie/voluntary-and-community-documents to identify available funding schemes.
- Calendar suitable funding schemes and decide on appropriate capital / technical / operational support to target in a 2 year investment plan.
- Target Arklow Town Council and Wicklow County Council for funding schemes they co-ordinate, e.g. for playground landscaping, Dept. of Environment, Heritage and Local Government schemes.
- Ensure to consider staffing needs and funding opportunities for staffing at the outset.
- Consider options to divide project up into elements or phases to maximise funding opportunities.
- Develop local fundraising plan to achieve external funding leverage.
- Target local industry for support; consider asking the Chamber of Commerce to help to broker external industry sponsors.
- Establish sound financial recording system, bank account and ensure regulatory compliance from the outset.

**Feasibility study report:
The Case for a New Community Centre in Arklow**

For queries on community development activity in Arklow contact:

Ann Byrne
Manager
Arklow Community Enterprise
Arklow
Co. Wicklow

T. 353 (0)402 91092
E. acemanager@eircom.net

For queries on the report, contact:

Ruth Pritchard
RSP Consulting

T. 353 (0) 87 3222082
E. ruth@rspconsulting.info
W. www.rspconsulting.info

Copyright Arklow Community Enterprise and Ruth Pritchard, t/a RSP Consulting

June 2008

51, Ferrybank 15
ARLOW
Co. Wicklow

26/10/2010
J. Tyrrell

26/10/2010

ARLOW Town Council
North Quay
ARLOW.

On charge,

I am submitting a request to have my home-alone address - deleted from the record of protected structures for the following reasons.

- We love this house which is our family home and we never wish to change the character of it, - but many features inside the house have been changed over the years.

The house was close to dereliction when my late husband - Patrick J. Tyrrell - took over responsibility for it. The roof has been replaced and over £20,000 was spent on making the house fit to live in.

Only one original fire place remains and that is not functional and that chimney was removed when they were building the Vet's house next door.

Other features have also been changed
which ~~are~~ would need to be seen
to be explained

In an old aged pensioner with
no savings to pay for any restoration
repairs - we have great difficulty
keeping the place in repair for everyday
practical reasons.

It's our home - we love it
perhaps some day my grand children
can afford to restore it - in the
meantime we are making every effort
to protect it as far as we
possibly can

Miss Le Meas

Marie Lynell

16

Leonora Earls

From: Stephen Little [stephenlittle@sla-pdc.com]
Sent: 20 October 2010 11:36
To: Arklow Development Plan
Subject: DRAFT PLAN SUBMISSION
Importance: High

Dear Sir/Madam,

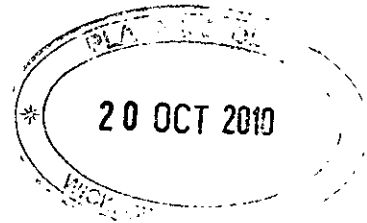
Please find enclosed submission on behalf of Dawnhill Properties to the Arklow Town and Environs Draft Development Plan 2011 - 2017 for your attention.

We would be grateful for acknowledgement of this email and also for written acknowledgement of this submission in due course.

Kind Regards

Stephen Little
Managing 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/>



DISCLAIMER--

This information transmitted in this email and any files transmitted with may be confidential. It is intended for the sole use of the addressee only. If you are not the intended recipient you are not authorised to read, copy or use the e-mail or any attachment. Stephen Little & Associates do not accept liability for, or permit; the creation of contracts on its behalf by e-mail, the publication of any defamatory statement by its employees by e-mail or changes subsequently made to the original message. This communication represents the originator's personal views and opinions that do not necessarily reflect those of Stephen Little & Associates.

Stephen Little & Associates do not accept liability for damage sustained as a result of malicious software (e.g. viruses). If you have received this e-mail in error, please notify the sender by return e-mail and then destroy it.

Stephen Little & Associates Ltd. trading as Stephen Little & Associates is Registered in Ireland No. 367533, and has its registered office at 6 Upper Mount Street, Dublin 2. Company Directors: Stephen Little (Managing), Melanie Little.

Acknowledged
20/10/2010
SEL



STEPHEN LITTLE & ASSOCIATES
Chartered Town Planning and Development Consultants

Town Clerk,
Arklow Town Council,
Avoca River House,
North Quay,
Arklow

Our Ref. 10129

arklowplanreview@arklowtc.ie

19 October 2010

RE: ARKLOW TOWN & ENVIRONS DRAFT DEVELOPMENT PLAN, 2011 – 2017

Dear Sir,

We are instructed by Dawnhill Properties, 4 The Courtyard, Carmanhall Road, Sandyford, Dublin 18 to submit comments on the Arklow Town and Environs Draft Development Plan, 2011 – 2017 which is currently on public display up to 5.00pm on the 26 October 2010.

Our client controls the entire of the lands designated "Action Area 3 – Kilbride" as shown on Map 10.03 of the Draft Development Plan. Our client also controls the lands, situated immediately south of the Action Area 3 lands, where these directly abut the Marsh and which have been shown to be within designated flood zones associated with the Avoca River; these are shown as part of the 'Conservation Zone' within the Draft Plan.

Our client acknowledges the strategic significance of the Action Area 3 lands to the Council in meeting their statutory obligations under the Regional Planning Guidelines for the Greater Dublin Area 2010 – 2022 and confirm that our client is anxious to assist the Council in this regard.

Our client is supportive of the proposals for the Action Area 3 lands at Kilbride as set out in the Draft Development Plan and in particular to the provisions as set out in Section 10.4 of the Draft Plan which relate specifically to the Action Area 3 lands.

Our client is looking forward to engaging with the Development Management Team of the Council once the Plan is adopted in devising the appropriate vision for these lands so as to facilitate the appropriate phased release of residential, community and open space within the area as a whole, in accordance with the principles of proper planning and sustainable development.

In summary therefore, Dawnhill Properties would urge the Council to approve the proposals for the Action Area 3 – Kilbride lands as presented in the Draft Plan.

We would be grateful for a written acknowledgement of this submission in due course.

Yours sincerely,


Stephen Little

STEPHEN LITTLE & ASSOCIATES