



Who are you:	Agent
Name:	Paul Maher
Reference:	ARKLPF-132433
Submission Made	November 12, 2025 2:17 PM

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- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Maps:

- Land Use Map

Maps:

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Submission on behalf of Paul Maher.pdf, 4.47MB



Report:

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PLANNING SUBMISSION

Variation no. 5 to the County Development Plan 2022 - 2028

Arklow Local Planning Framework

Brigg's Lane, Arklow, Co. Wicklow, Y14 WK11

Paul Maher

Realt na Mara, Ocean Crest, Arklow, Co. Wicklow, Y14 TV78

Wicklow County Council

12/11/2025

ARMSTRONG PLANNING



1. INTRODUCTION & EXECUTIVE SUMMARY

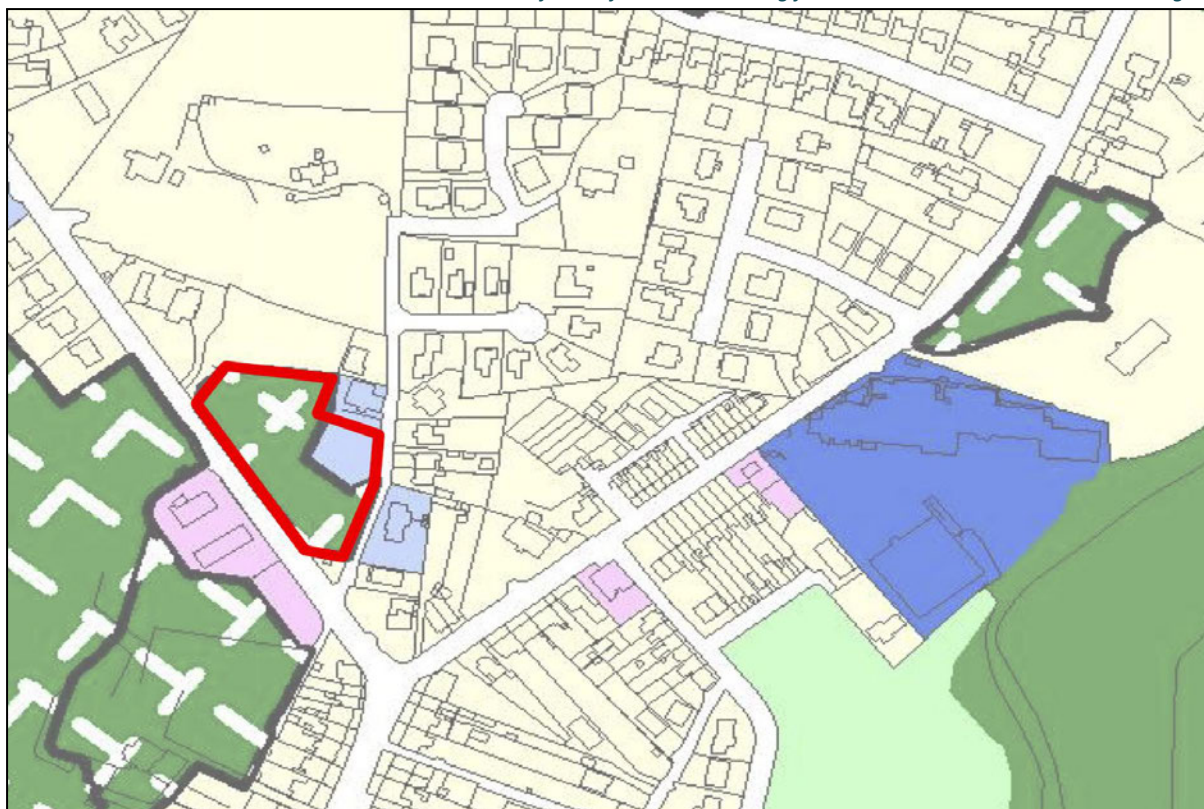
Armstrong Planning – with offices at 12 Clarinda Park North, Dún Laoghaire, Co. Dublin, A96 V6F9 – have been retained by Paul Maher (our Client), [REDACTED] to make this Submission in relation to the proposed rezoning of lands at Brigg's Lane, Arklow, Co. Wicklow, Y14 WK11 (the subject lands, as identified in Fig. 1 below) in the *Draft Arklow Local Planning Framework 2025* (the Draft LPF), which is proposed Variation No. 5 to the *Wicklow County Development Plan 2022-2028* (the Development Plan).

Proposed Amendment:

The subject lands, as identified at Fig 1, at Brigg's Lane, Arklow, Co. Wicklow, Y14 WK11, are currently zoned as 'RE' (Existing Residential) under the Arklow and Environs Local Area Plan 2018–2024. Under the Draft Arklow Local Planning Framework 2025, it is proposed that these lands be rezoned to 'OS2' (Natural Areas) and 'CE' (Community and Education). This submission seeks that, instead, the lands be rezoned to 'RN1' (New Residential - Priority 1) to reflect their established suburban context, existing residential character, and proximity to Arklow Town Centre.

Fig 1. Extract from Map No. 1: Land Use Zoning Objectives of the Draft LPF annotated in red to show the approximate extent of lands which are proposed under the Draft LPF to be rezoned as 'OS2' (Natural Areas) and 'CE' (Community and Education), and for which this submission now seeks rezoning to 'RN1' (New Residential - Priority 1).

Fig 1. Extract from Map No. 1: Land Use Zoning Objectives of the Draft LPF annotated in red to show the approximate extent of lands for which rezoning from 'OS2' and 'CE' to 'RN1' is now sought





2. PLANNING RATIONALE FOR THE PROPOSED AMENDMENT

2.1 Sequential Development

The proposed rezoning represents logical sequential development, helping to fill a gap within the development envelope in the 'edge of centre' suburban area between the R772 and R750 Regional Roads immediately north of Arklow Town Centre. The subject lands are currently zoned 'RE' (Existing Residential) under the Arklow and Environs Local Area Plan 2018–2024, recognising their location within the established built-up area of the town. However, under the Draft Arklow Local Planning Framework, the lands are proposed to be redesignated as 'OS2' (Natural Areas) and 'CE' (Community and Education). Given that the lands remain largely undeveloped, this submission seeks their rezoning to 'RN1' (New Residential – Priority 1), which more appropriately reflects their potential to accommodate new residential development in a sequential, serviced, and sustainable manner consistent with the Draft LPF's settlement strategy.

In relation to residential zoning, the Draft LPF states:

"It is an aim of this LPF to focus new residential development into the existing serviced built up envelope of the settlement. The 'Town Centre' (TC) zone, Waterfront Zone (WZ) and the 'Existing Residential' (RE) zone all present significant housing opportunities through densification of the existing built up area, re-use of derelict or brownfield sites and the development of infill and backland sites... These central areas may not be sufficient in size and scope to accommodate all of the required long term future housing growth and therefore new 'greenfield' housing development shall also be considered. In this regard:

- *Edge of centre' locations will be considered the priority location for such new greenfield residential development and will generally be zoned as 'New Residential - Priority 1' (zoned RN1). These sites are generally within a 15 minute walk of the Arklow Main Street and/or a 15 minute walk of Arklow Train Station."*

The development of this 'edge of centre' infill site, located approximately 9 minutes walk from Main Street, would consolidate the existing settlement pattern of the town, making efficient use of existing infrastructure while avoiding urban sprawl and completing this important gateway approach to Arklow.

2.2 Subject Lands are Appropriate for New Residential Development

The majority of the subject lands are zoned 'OS2' (Natural Areas) under the Draft LPF, while a small proportion of the site is zoned as 'CE' (Community and Education) as that portion of the site was previously used as a surface carpark associated with the National Learning Network Centre. The site of the National Learning Network Centre is now in the ownership of the Rehab Group and does not form part of the subject lands to which this submission relates.

The subject lands, which our Client is now seeking to be rezoned to 'RN1' (New Residential - Priority 1) are considered to be suitable for new residential development for the following reasons:

- **Flood Risk and Justification Test:** Arklow Town is located on the Avoca River and it is noted that a large proportion of Arklow Town is located within a Flood Risk zone. Having regard to the Draft LPF Strategic Flood Risk Assessment, a Site Specific Flood Risk Assessment and Justification Test for the subject lands has been prepared by Tent Engineering Ltd and is attached to this submission. The SSFRA and Justification Test indicate that the majority of the



subject lands lie outside Flood Zone A and that the lands are suitable for residential development.

- **Accessible:** The subject lands on Brigg's Lane are located less than 200 m from the zoned town centre of Arklow and approximately 900 m from Main Street. There is a pedestrian footpath along the western boundary of the site, which continues for the length of the R772 into Arklow.
- **Proximity to Services and Community and Social Infrastructure:** Due to its proximity to the town centre, the subject lands are well-served by local services, including schools, shops (including Bridgewater Shopping Centre), pubs and restaurants and medical and community uses. The Draft LPF also notes that *"Arklow is the main centre in the south of the County"*. Arklow is designated as a 'Self-Sustaining Growth Town' in the Development Plan and is identified for growth in residential, employment and service functions and as *"a key focus for economic growth in the County"*.
- **Suburban Context:** As is evident from Fig 1 above, the large majority of lands in the wider area surrounding the subject lands have been developed for residential use, interspersed with pockets of commercial, educational and community uses. Lands between the R772 and R750 Regional Roads have been subject to considerable residential development since the 1990s and are suburban in character. The subject site is one of the only undeveloped sites in the streetscape of the R772, which functions as one of the principal approaches to the town.

2.3 Rezoning of the Subject Lands Supports the Achievement of National Planning Policy Objectives

National Planning Framework

National Policy Objective 7 of the *National Planning Framework - First Revision* of April 2025 (the NPF) seeks to *"Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth"*. Similarly, National Policy Objective 9 states that it is national planning policy to *"Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth."*

The Draft LPF has a similar aim. The Population and Housing Development Strategy states that *"a minimum of 30% of the targeted housing growth shall be directed into the existing built up area of the settlement, on lands zoned 'town centre', 'existing residential' and 'mixed use'. Noting that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction on the number of units that may be delivered within the built up envelope of the town"*. The Overall Strategy of the Draft LPF seeks, *inter alia*, to *"consolidate the existing built pattern in Arklow by firstly prioritising and maximising the development potential of large and infill sites in the town centre and the waterfront zones (particularly vacant or under-utilised sites) and secondly by promoting the development of sites, brownfield and greenfield, that maximise their proximity to Arklow town centre."*

The subject lands are located within the boundary of town in a long-established built-up area in close proximity to Arklow's Town Centre. Rezoning this modest site 'RN1' would facilitate the consolidation of this largely developed suburban area in North Arklow and would serve to support the achievement of NPF Objectives for the consolidation of existing built-up areas in and around towns.

Design Manual for Urban Roads and Streets



The R772 Regional Road is the main road running through Arklow and the section of the R772 along the western boundary of the subject lands is one of the principal approaches to the town.

The principles, approaches and standards set out in the *Design Manual for Urban Roads and Streets* (DMURS), and the associated Advice Notes, apply to all urban roads and streets (i.e. streets and roads with a speed limit of 60 km/h or less). *Advice Note 1: Transition Zones and Gateways* explains the difference between rural areas, transition zones and urban areas. Having regard to the nature of boundaries, the extent of development and location of buildings relative to the road, the width of the carriageway, the presence of street lighting and the applicable speed limit, it is submitted that this section of the R772 is located within an urban area within the meaning of DMURS.

DMURS sets out that “*Designers should seek to promote/maintain a sense of enclosure on all streets within cities, towns and villages*”. The Manual refers to a number of factors that influence the sense of enclosure on urban streets, such as building height to street width ratio and the continuity of the street wall or the percentage of the street wall that is solid. Indeed, DMURS also encourages the introduction of measures that provide enclosure outside urban areas, including transitional zones.

As noted above, the subject site is one of few undeveloped sites along this section of the R772. The relatively modest size of the site, its proximity to Arklow Town Centre and its suburban context raises concerns regarding whether zoning these lands as a ‘Natural Area’ is sustainable in the longer term. It is noted that the Zoning Objective ‘OS2’ seeks to “*protect and enhance existing open, undeveloped lands*”. However, the subject lands cannot be described as “*open*”, but comprise a pocket of lands largely covered in scrub growth.

An isolated pocket of scrub growth surrounded by development could quickly become waste land on this otherwise suburban road, which forms a key approach route to the town. The proposed rezoning of the subject lands from ‘OS2’ (Natural Areas) and ‘CE’ (Community and Education) to ‘RN1’ (New Residential - Priority 1) would facilitate the sustainable redevelopment of this site in line with the existing pattern of development along this gateway road to Arklow, thereby increasing the sense of enclosure in line with the principles outlined in DMURS.

3. CONCLUSION

This submission, prepared on behalf of Paul Maher, seeks the rezoning of lands at Brigg’s Lane, Arklow, Co. Wicklow, Y14 WK11 from ‘OS2’ (Natural Areas) and ‘CE’ (Community and Education) to ‘RN1’ (New Residential - Priority 1) in the *Draft Arklow Local Planning Framework 2025*, which is proposed Variation No. 5 to the *Wicklow County Development Plan 2022-2028*. The subject lands at Brigg’s Lane are bounded by the R772 Regional Road and are located within the established development envelope of Arklow, positioned between existing residential developments in what is demonstrably a suburban context.

The planning merits for this rezoning are compelling. The subject lands are zoned ‘RE’ (Existing Residential) in the *Arklow and Environs Local Area Plan 2018-2024* and benefit from direct road frontage and pedestrian connectivity to the town centre, and have been confirmed through professional Site Specific Flood Risk Assessment to pass a Justification Test indicating suitability for residential development. The site represents one of the few remaining undeveloped parcels along this section of the R772, where the established pattern is of residential and mixed-use development. Its development would constitute sequential infill growth that consolidates the existing urban area rather than extending into greenfield lands.

The proposed rezoning directly supports key objectives of the *National Planning Framework*, particularly NPO 7 and NPO 9, which seek to direct new residential development to the built-up footprint of existing settlements to ensure compact and sequential patterns of growth. This modest rezoning would facilitate much-needed residential development within the boundary of the town



and in close proximity to Arklow Town Centre. We respectfully request that the Planning Authority recognise the clear planning merits of this sustainable infill site and adopt the proposed rezoning in the final Local Planning Framework.

We look forward to the Planning Authority's positive consideration of this submission and to the proposed rezoning of the subject lands at Brigg's Lane, Arklow, Co. Wicklow, Y14 WK11 from 'OS2' (Natural Areas) and 'CE' (Community and Education) to 'RN1' (New Residential - Priority 1) in the *Draft Arklow Local Planning Framework 2025*. The rezoning of this accessible, underutilised site on this busy suburban gateway to the Self-Sustaining Growth Town would facilitate the consolidation of the urban area of the town in line with local, regional and national planning policy.

Please direct all correspondence in this matter to Armstrong Planning at 12 Clarinda Park North, Dún Laoghaire, Co. Dublin, A96 V6F9.

Prepared by,

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Planning Pack Map



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Briggs Lane, Arklow Flood Risk Assessment

11.11.2025

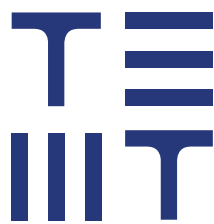
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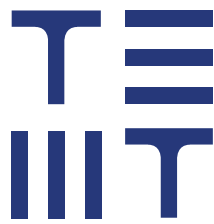
Site Address:
Briggs Lane (off Dublin Road)
Arklow,

Client:
Paul Maher



TENT ENGINEERING

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TENT ENGINEERING

Revision and Review

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PURPOSE

P1	Information
P2	Coordination
P3	Planning
P4	Building Control
P5	Pre-tender
P6	Tender
P7	Construction

REVISION(S)

Rev.	Description	Date
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ACCEPTANCE (BY OTHERS)

S	Issued
A	Accepted
B	Accepted subject to comments
C	Rejected
D	Acceptance not required

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Accepted by

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1 Executive Summary

This report presents a detailed Flood Risk Assessment (FRA) for the proposed residential development located at Briggs Lane (off Dublin Road), Arklow, Co. Wicklow. The proposed scheme comprises four two-storey dwellings on approximately 1.234 acres (0.499 ha) of land.

The site layout has been carefully designed to position dwellings on the higher northern and central portions of the plot and raising the FFL levels above the surrounding site level, thus minimising any works within Flood Zones A and B. The principal flood risk to the site arises from fluvial flooding associated with the Avoca River and Arklow Marsh, which bound the low-lying land to the south-west. Coastal flooding is not a constraint, as confirmed by the OPW Arklow Coastal Flood Extent Map, which shows the subject lands outside the 10 %, 0.5 %, and 0.1 % AEP tidal extents.

A Site-Specific Flood Risk Assessment (SSFRA) and Justification Test have been undertaken to guide the design. The approach confines all residential buildings to raised ground at a Finished Floor Level (FFL) of 6.00 mOD, effectively placing the dwellings within Flood Zone C (low probability of flooding). The lower areas (falling to $\approx$ 2 mOD) will function as public open space and SuDS infrastructure, providing attenuation and overland-flow routing while maintaining natural storage capacity.

Historic drainage issues at the site were traced to a blocked culvert discharging to the marsh, which caused temporary ponding on the land. As noted in correspondence with Cllr. Pat Fitzgerald, this culvert has now been cleared, allowing normal drainage to resume and materially improving site conditions. Refer to appendix for details of this correspondence.

Development within Flood Zones A and B will therefore be minimal and limited to landscaping and surface-water management works. All dwellings will be constructed with FFLs = 6.00 mOD, with local grading away from thresholds and permeable surface finishes (driveways and paths) to promote infiltration and control runoff. This platform provides over 2.9 m freeboard above the OPW 0.1 % AEP (extreme) fluvial water level of 3.02 mOD identified for the Arklow AFA, ensuring robust allowance for both climate-change uplift and freeboard in line with current OPW/DoEHLG guidance.

Existing vegetation along the site's southern boundary adjacent to the marsh will be retained and enhanced as part of the SuDS and landscape strategy, supporting natural flood mitigation and biodiversity.

Flood-risk management in the area is overseen by Wicklow County Council (WCC) in coordination with the Office of Public Works (OPW) under the CFRAM Programme for the Arklow AFA. No reliance is placed on external flood defences; the proposed development achieves resilience through level-raising, SuDS integration, and maintenance of the existing culvert network.

Table 1.1 - Flood Risk Summary Table

Fluvial Risk (1% AEP)*	Tidal Risk (0.5% AEP)**	Climate Change***	Comments
			The proposed FFL of the proposed development is raised +2.9m above the OPW 0.1% AEP (Extreme fluvial Flooding). The risk of flooding in units that encroach into the potential flood zones is eliminated. Safe access/egress has not been compromised at any time with the primary access routes to the northern boundary.
Mitigation Necessary	Mitigation Necessary	Mitigation Necessary	

Table 1.2 - Flood Risk summary table

- * 1% AEP is the 100-year returning period event (1 in 100 chance in any given year)
- ** 0.5% AEP is the 200-year returning period event (1 in 200 chance in any given year)
- *** Potential climate change (increase in rainfall of 20% and sea level rise of 0.5m as recommended by OPW)

2 Introduction

2.1 Project

The proposed development is located at Briggs Lane (off Dublin Road), Arklow, Co. Wicklow, on lands measuring approximately 1.234 acres (0.499 ha). The site forms part of an established residential area and is zoned Existing Residential under the Wicklow County Development Plan 2022–2028. It fronts Briggs Lane / Dublin Road and occupies a transitional position between the developed urban area and the Avoca River / Arklow Marsh corridor.

This report assesses the potential flood risks associated with the proposed residential development, drawing on data from the OPW CFRAM studies for the Arklow AFA, along with site-specific topographical information and on-site drainage observations.

Figure 2.1 - Site Location

A portion of the site lies within Flood Zones A and B, where national policy generally seeks to restrict or prohibit highly vulnerable uses such as residential development. However, as the subject lands are zoned for residential use and constitute an infill opportunity within the defined settlement boundary of Arklow, the proposal qualifies for detailed evaluation under the Justification Test for Development Management.

Accordingly, this report presents and addresses the Justification Test criteria as required by the Planning System and Flood Risk Management Guidelines (DoEHLG/OPW, 2009, as updated), demonstrating that the proposed scheme can be delivered safely and sustainably without increasing flood risk to the site or adjoining lands.



Figure 2.2 - Site Location in Relation to Local Road Network

2.2 Scope of Assessment

This assessment evaluates potential flood risks associated with fluvial, pluvial, tidal, groundwater, and surface-water flooding. The objective is to identify and analyse potential risk factors, impacts, and mitigation measures for each flood mechanism relevant to the proposed development area at Briggs Lane, Arklow.

– Fluvial Flooding:

Fluvial flooding occurs when rivers or water-courses exceed their capacity and overflow into adjacent land. The primary fluvial influence at this site arises from the Avoca River and Arklow Marsh system, located to the south-west. Under extreme events, elevated water levels in this system can affect the low-lying fringe of the subject site (approximately 2 mOD). Existing riparian vegetation and marshland along this corridor provide natural attenuation and interception capacity. It is recommended that this vegetation be retained and enhanced to sustain infiltration, slow overland flow, and maintain natural flood-plain function.

– Pluvial Flooding:

Pluvial flooding results from intense rainfall that temporarily overwhelms the local surface-water drainage capacity, leading to ponding or shallow overland flow. To manage this, the development will incorporate permeable paving, soakaways, and SuDS measures to ensure post-development runoff rates do not exceed greenfield conditions. Selective clearance of existing vegetation will be offset by compensatory planting and infiltration areas designed to maintain site permeability and reduce surface ponding risk.

– Tidal Flooding:

The site lies inland and outside the mapped tidal extents, as confirmed by the OPW Arklow Coastal Flood Extent Map. No direct tidal inundation is anticipated. While the Avoca estuary experiences tidal influence, CFRAM data confirm that coastal flood levels (0.1 % AEP) do not reach the subject lands. Accordingly, tidal flooding is not a design constraint for this development.

– Groundwater Flooding:

Groundwater flooding can occur when the water table rises close to or above the ground surface, particularly following extended rainfall. The site's permeable ground conditions and shallow fall

(approximately 5 mOD to 2 mOD) provide favourable drainage characteristics. The design retains mature vegetation and deep-rooted planting to promote infiltration and support groundwater balance. No groundwater flooding has been recorded historically at this location.

– Surface Water Flooding:

Surface-water flooding can arise from uncontrolled runoff during heavy rainfall or from blockage of local drainage paths. The proposed drainage layout maintains existing overland-flow paths toward the marsh and integrates permeable surfacing for drives and footpaths. New hardstanding areas will include intercept drains and falls away from buildings to prevent local ponding. Outflows to the existing culvert connection will be controlled via an attenuation and non-return system to ensure no increase in flood risk to adjoining properties.

2.2.1 Flood Impact

If not properly managed, the proposed construction could influence local flood behaviour. The site's proximity to the Avoca River and Arklow Marsh corridor means that the southern, lower-lying portion is more sensitive to flooding during extreme fluvial events. The existing riparian vegetation along this boundary provides an important natural buffer, helping to absorb surface water, slow overland flow, and enhance infiltration capacity.

The introduction of hardstanding and roof areas will alter the site's hydrology by increasing runoff and reducing infiltration. To mitigate these effects, it is recommended to retain and reinforce riparian vegetation, maintain the southern floodplain as open space and SuDS infrastructure, and employ permeable surface finishes across drives and paths.

A detailed surface-water management strategy will be implemented to manage runoff effectively, incorporating a suite of Sustainable Drainage Systems (SuDS)—including soakaways, infiltration systems, tree pits, permeable paving, and attenuation features with controlled discharge—to ensure that post-development runoff does not exceed greenfield rates and that flood risk is not increased on or off site.

Figure 2.3 - Extract from OPW AFA Fluvial Flood Maps

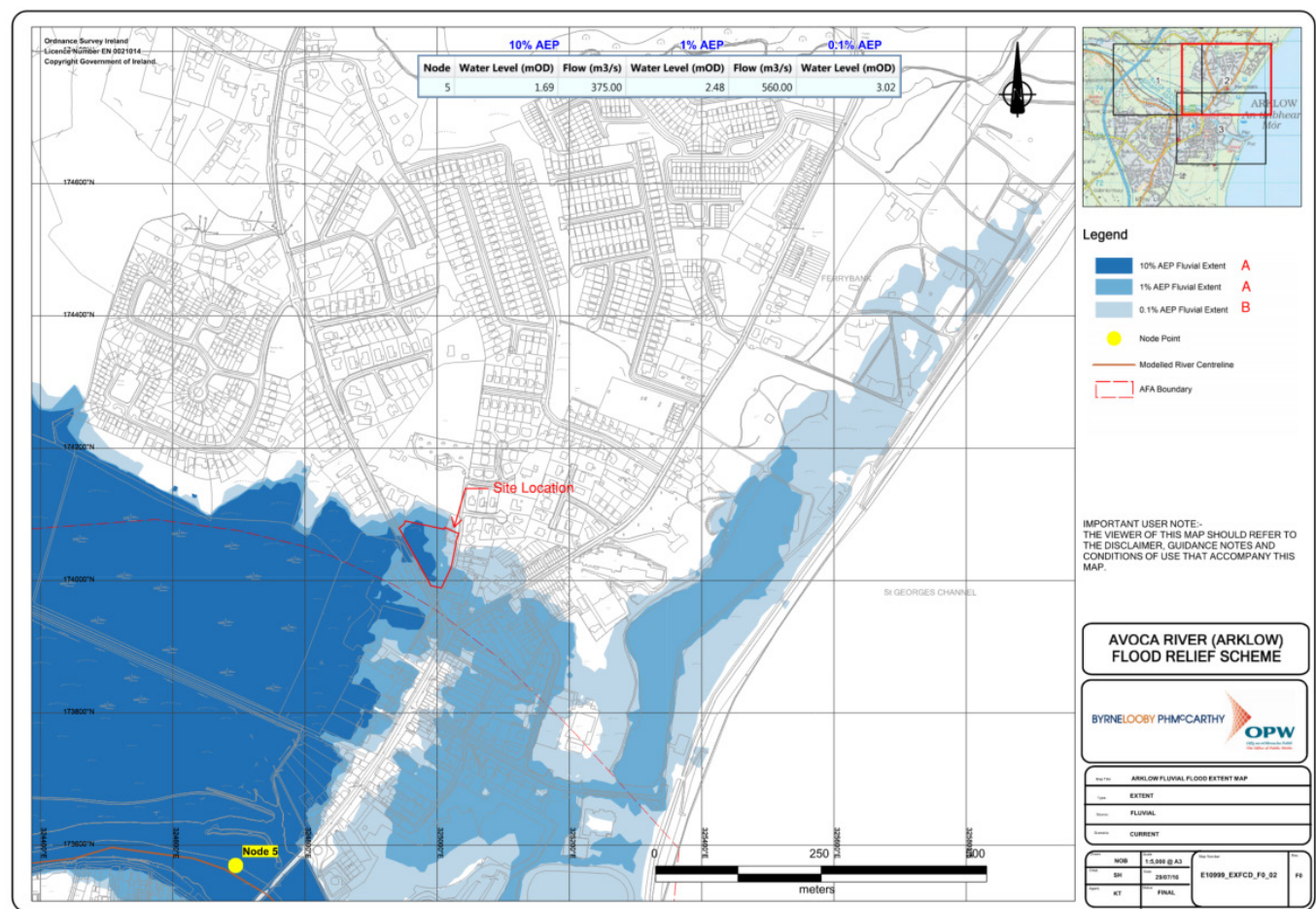
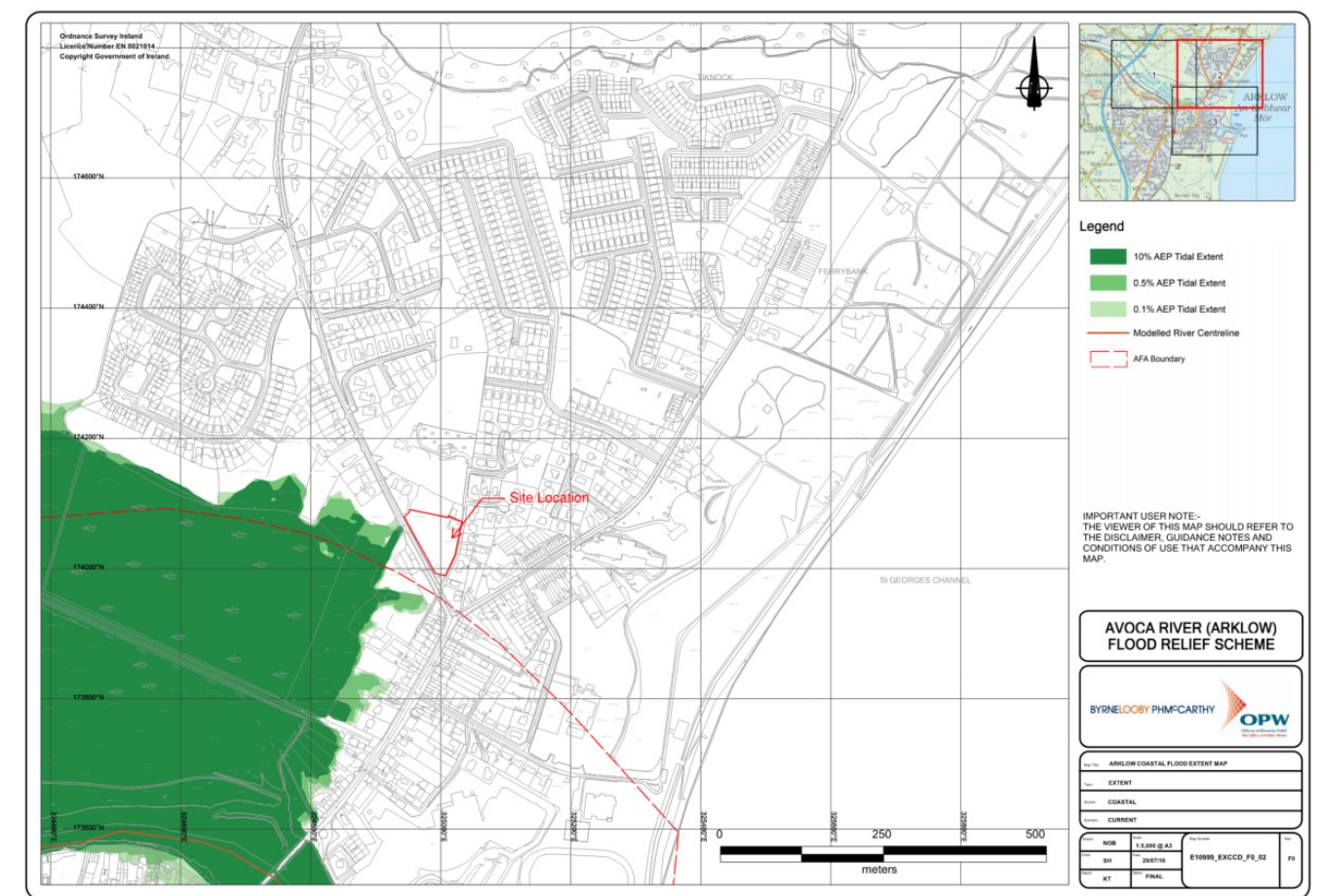


Figure 2.4 - Extract from OPW AFA Coastal Flood Maps



3 Existing Site Details

3.1 History and current use

The site is proposed for low-density residential development, with a strong emphasis on retaining and enhancing existing vegetation to both mitigate flood risk and support local biodiversity and ecological resilience.

3.2 Existing Watercourses

The Avoca River and Arklow Marsh form the relevant watercourse system for this site, flowing generally west to east to the south of the lands, and influencing the lowest part of the site during extreme fluvial events. The OPW CFRAM (Arklow AFA) mapping identifies fluvial flood extents affecting the southern, low-lying ground, while the northern boundary of the site—fronting Briggs Lane and Dublin Road—lie within Flood Zone C (low probability of flooding).

The CFRAM coastal mapping confirms that the site is outside the mapped tidal flood extents, indicating no direct coastal encroachment or backwater influence from the estuary. Retaining and enhancing riparian vegetation along the southern boundary will support natural drainage, improve infiltration, and strengthen the site's overall flood-mitigation capacity.

3.3 Topography and FFL

A detailed topographical survey has not yet been undertaken for the site. However, a desktop assessment using available mapping and elevation data indicates that ground levels fall gradually from approximately 5.5 m AOD at the northern boundary along Briggs Lane / Dublin Road to around 2.0 m AOD at the southern boundary adjoining the Avoca River and Arklow Marsh. This represents an overall gradient of roughly 1.3 % across the site. The indicative topography suggests that the southern portion lies relatively low and is therefore more sensitive to fluvial flooding during extreme events, while the northern and central sections remain well above the predicted flood extents identified in the OPW CFRAM (Arklow AFA) mapping. A comprehensive topographical survey will be completed at the next design stage to confirm these findings and inform detailed drainage and platform design.

Mapping from the Geological Survey of Ireland (GSI) identifies no rock outcrops within or immediately adjacent to the site, a finding supported by visual inspection, which confirmed the absence of exposed rock. The underlying soils are classified as gravel derived from Lower Palaeozoic sandstones and shales, with marine sand and gravel deposits present in the lower southern area. These soils are expected to provide adequate bearing capacity for standard foundation design and exhibit favourable infiltration characteristics suitable for Sustainable Drainage Systems (SuDS).

A comprehensive geotechnical site investigation will also be undertaken at the detailed design stage to confirm the subsurface profile, soil strength, and depth to bedrock, ensuring that both foundation design and the surface-water drainage strategy are appropriately optimised for the confirmed site conditions.

4 Site & Flood Risk

4.1 Planning and Flood Risk

In November 2009 the Planning System and Flood Risk Management System document was produced which provides guidance on how flood risk should be assessed during the planning and development process. There are three types of levels of flood zones defined by the Planning System and Flood Risk Management:

- **Flood Zone A**

The probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding and 0.5% or 1 in 200 for coastal flooding)

- **Flood Zone B**

The probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 and 0.5% or 1 in 200 for coastal flooding)

- **Flood Zone C**

The probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood zone C covers all areas of the plan which are not in zones A or B.

Flood Zone C encompasses all areas of the site not classified as Flood Zone A or B. Following detailed review of the OPW flood maps and floodinfo.ie datasets, it has been determined that while portions of the site are subject to potential flood risk, the proposed dwellings are predominantly located within areas of lowest flood risk (Flood Zone C).

Where any dwelling is situated within Flood Zone A or B, finished floor levels (FFLs) will be raised locally to ensure that each unit remains above the predicted design flood level, thereby removing it from flood risk.

All non-structural works within the potential flood influence areas — including landscaping, pathways, and public open spaces — will incorporate permeable materials and sustainable drainage (SuDS) features to minimise surface water runoff and promote infiltration. Ingress and egress routes to and from the site and individual dwellings will remain unaffected and safe under all design flood scenarios.

4.2 Flood Zone Compatibility

The proposed development comprises residential units at Briggs Lane (off Dublin Road), Arklow, with the Avoca River and Arklow Marsh forming the relevant watercourse in the surrounding area. The development footprint is predominantly located within Flood Zone C (low probability of flooding) on the higher northern and central portions of the lands, while Flood Zones A and B are confined to the southern low-lying area, which is designated as open space and SuDS infrastructure to safely manage residual flood risk.

Vegetation plays an important role in flood mitigation by enhancing infiltration, slowing overland flow, and supporting natural drainage. Where feasible, existing vegetation should be retained and reinforced, particularly along the southern boundary. Where removal is unavoidable, replanting with deep-rooted species will maintain ecological resilience and contribute to the site's natural flood defences.

A comprehensive Sustainable Drainage Systems (SuDS) strategy will be implemented, incorporating permeable paving, infiltration systems, soakaways, tree pits, and attenuation features to manage runoff and maintain greenfield discharge rates. Ongoing inspection and maintenance of these systems will ensure continued performance and effective water management throughout the site's lifecycle.

All new dwellings will be constructed with Finished Floor Levels (FFLs) set at 6.00 m OD, providing approximately 2.9 m of freeboard above the OPW 0.1 % AEP (extreme) fluvial water level of 3.02 m OD identified for the Arklow AFA.

This raised platform ensures that habitable floors remain above the design flood level, aligning with the Planning System and Flood Risk Management Guidelines (DoEHLG/OPW, 2009, as updated) and current Wicklow County Council policy.

4.3 Justification Test

In accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (Department of the Environment, Heritage and Local Government & Office of Public Works, November 2009), all proposed developments must be assessed in terms of their vulnerability to flooding and their compatibility with the flood zones in which they are situated.

As identified in this Site-Specific Flood Risk Assessment (SSFRA), portions of the subject site at Briggs Lane (off Dublin Road), Arklow lie within Flood Zones A and B, while the remainder of the site is located within Flood Zone C (low probability of flooding).

The proposed development comprises residential dwellings, which are categorised as a “Highly Vulnerable” land use under the classifications set out in Figure 4.4 – Classification of Vulnerability of Different Types of Development of the Guidelines. Consequently, the proposed scheme has been designed to locate all residential units within Flood Zone C, with the lower-lying areas

Figure 4.4 - Classification of Vulnerability of Different Types of Development

Vulnerability class	Land uses and types of development which include*:
Highly vulnerable development (including essential infrastructure)	Garda, ambulance and fire stations and command centres required to be operational during flooding; Hospitals; Emergency access and egress points; Schools; Dwelling houses, student halls of residence and hostels; Residential institutions such as residential care homes, children's homes and social services homes; Caravans and mobile home parks; Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility; and Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.
Less vulnerable development	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions; Land and buildings used for holiday or short-let caravans and camping, subject to specific warning and evacuation plans; Land and buildings used for agriculture and forestry; Waste treatment (except landfill and hazardous waste); Mineral working and processing; and Local transport infrastructure.
Water-compatible development	Flood control infrastructure; Docks, marinas and wharves; Navigation facilities; Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location; Water-based recreation and tourism (excluding sleeping accommodation); Lifeguard and coastguard stations; Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan).

*Uses not listed here should be considered on their own merits

in Zones A and B reserved for public open space and Sustainable Drainage Systems (SuDS), thereby ensuring compliance with national flood-risk management policy.

According to Figure 4.5 – Matrix of Vulnerability versus Flood Zone to Illustrate Appropriate Development and to Meet the Justification Test of the Planning System and Flood Risk Management Guidelines (DoEHLG/OPW, 2009), highly vulnerable developments, such as residential housing, are considered appropriate only within Flood Zone C and inappropriate within Flood Zones A or B, unless the proposal satisfies the Justification Test for Development Management.

As a portion of the site intersects Flood Zones A and B, a Justification Test is required to demonstrate that the proposed development:

- Complies with the core principles of sustainable flood risk management;
- Does not increase flood risk elsewhere and, where practicable, reduces overall flood risk;
- Incorporates design measures to minimise flood risk to people, property, and the environment; and
- Aligns with the strategic planning objectives of the Wicklow County Development Plan 2022–2028 and the broader settlement strategy for Arklow.

The following section presents the Justification Test for Development Management, evaluating the proposal against the criteria outlined in Box 5.1 of the Guidelines. This assessment demonstrates that the proposed residential development can proceed safely, sustainably, and in compliance with policy, incorporating appropriate mitigation, layout, and drainage measures that preserve the integrity of the floodplain and ensure the protection of future occupants.

Figure 4.5 - Matrix of Vulnerability versus Flood Zone to Illustrate Appropriate Development and to Meet the Justification Test

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

Criterion 1 — Appropriate Zoning / Designation

The lands are zoned “Existing Residential” under the Wicklow County Development Plan 2022–2028, the objective of which is “to protect and enhance the amenity and character of existing residential communities.” The site constitutes an infill parcel within the established urban area of Arklow, benefitting from existing services and infrastructure along Briggs Lane and Dublin Road.

This zoning designation supports the appropriate and sustainable development of residential uses on the site and provides a strong strategic planning basis for the application of the Justification Test. It is therefore important that the lands are zoned for residential use, ensuring consistency with both the settlement strategy for Arklow and the core principles of the Planning System and Flood Risk Management Guidelines (DoEHLG/OPW, 2009).

Conclusion: Criterion 1 is satisfied

Criterion 2 — Flood Risk Assessment and Outcomes

No increase (and, where practicable, reduction) in flood risk elsewhere

Flood mechanisms: Coastal and tidal influences from the Avoca estuary and Arklow Marsh do not extend inland to the site, as confirmed by the OPW Arklow Coastal Flood Extent Map, which shows the subject lands outside the mapped tidal flood zone. The existing coastal embankments and natural marshland act as a buffer, preventing direct coastal encroachment. Under extreme fluvial conditions, any out-of-banking from the Avoca River system is limited to the lower southern portion of the site, with the proposed development area remaining within Flood Zone C (low probability).

Mapped flood levels/extents: OPW CFRAM (Arklow AFA) mapping identifies coastal tidal water levels (TWLs) of approximately 2.99 m OD (0.5% AEP) and 3.55 m OD (0.1% AEP). The southern portion of the site intersects Flood Zones A and B, while the northern and central areas lie within Flood Zone C (low probability of flooding). These extents are illustrated on the OPW Arklow Coastal and Fluvial Flood Extent Maps.

Layout-led avoidance: The site layout will concentrate all buildings within the higher northern area (Flood Zone C), while the southern portion (Flood Zones A and B) will be reserved for public open space and Sustainable Drainage Systems (SuDS). This approach avoids placing vulnerable development in higher-risk areas, preserves the natural floodplain function, and allows for the temporary conveyance and storage of floodwater, thereby preventing displacement of storage volume and avoiding any increase in downstream flood risk.

SuDS strategy: Surface water will be managed primarily through infiltration within the site’s granular subsoils, as GSI mapping indicates gravel deposits with favourable infiltration characteristics. Where infiltration alone is not feasible, a controlled discharge to the existing culvert outfall serving the Arklow Marsh will be provided, supported by on-site attenuation to regulate runoff rates. These measures will be designed in accordance with the Sustainable Drainage Systems (SuDS) strategy outlined in Section 8 of this report, ensuring that post-development runoff does not exceed greenfield conditions.

Conclusion: By retaining Flood Zones A and B as open space and SuDS areas, and controlling runoff to greenfield-equivalent rates through a combination of infiltration and on-site attenuation, the proposed development will not increase flood risk elsewhere and will, in fact, deliver a net improvement over existing unmanaged greenfield runoff conditions.

Measures to minimise flood risk to people, property, economy and environment

Finished floor levels (FFLs): For any dwelling located near the mapped Flood Zone A/B interface, FFLs will be locally raised above the design flood level with appropriate freeboard. A site-wide minimum FFL of 6.00 m OD is adopted, providing approximately 2.9 m clearance above the OPW 0.1 % AEP (extreme) fluvial/tidal water level of 3.02 m OD identified for the Arklow AFA.

This level includes a robust allowance for climate-change uplift and freeboard, consistent with current OPW and Wicklow County Council guidance.

Flooding in this area is dominated by fluvial and estuarine interactions rather than by local surface-water storage constraints. The adjacent Arklow Marsh and Avoca River system provide an extensive floodplain and storage area, meaning that the limited volume of fill required to achieve the 6.00 m OD platform will have no measurable impact on flood levels or conveyance capacity. The relative scale of the marsh storage volume compared with the site-level infill is orders of magnitude greater, ensuring that minor local land-raising will not displace flood storage or cause any discernible increase in water levels on neighbouring lands.

Topography-led placement: Buildings are positioned on the higher northern portion of the site (Flood Zone C), set back from the southern boundary to minimise exposure to Flood Zones A and B. This arrangement follows the natural north-to-south fall in ground levels (approximately 5.2 m OD → 2.0 m OD), ensuring that vulnerable development remains on elevated ground and outside mapped flood-risk areas.

Materials & thresholds: Permeable paving will be provided to all driveways and footpaths, with positive falls away from building thresholds, flood-resilient external detailing, and exceedance routing directed through landscaped corridors within the designated open-space and SuDS areas.

Natural buffers: Retain and enhance riparian vegetation along the southern boundary adjoining the Avoca River / Arklow Marsh to slow overland flow, promote infiltration, and support natural floodplain function.

Conclusion: The design minimises flood risk to occupants and property through a combination of elevated floor levels, strategic building placement, integrated SuDS measures, and reinforced natural buffer zones.

Residual-risk management to an acceptable level

Residual coastal/backwater risk: Direct tidal inundation from the Avoca estuary is prevented by the existing coastal embankments and the natural marsh system, which together act as a buffer against sea-driven flooding. Residual coastal influence arises only through backwater effects within the Arklow Marsh during extreme tide events. The designated open-space and SuDS corridor functions as a sacrificial conveyance and storage zone, accommodating excess water safely without impacting the developed area.

Access/egress: Primary access is provided via Briggs Lane and Dublin Road along the higher northern boundary, ensuring safe and reliable entry and exit during all design flood events. The southern low-lying areas are intentionally kept free of dwellings and hardstanding, functioning instead as open space and SuDS zones to accommodate exceedance flows and maintain safe access and egress for residents under extreme conditions.

Management plan: Include an Emergency Flood Plan outlining flood-warning procedures, temporary or demountable threshold protection (where specified), and plant and utility isolation protocols, consistent with best practice and the mitigation framework established in the exemplar FRA.

Conclusion: Residual flood risk is effectively managed through a combination of level setting, safe access and egress, emergency procedures, and the retention of a functional open-space floodplain for storage and conveyance during extreme events.

In terms of compatibility with wider planning objectives, the scheme aligns with the principles of good urban design and compact growth, making efficient use of serviced infill land zoned “Existing Residential” within the Arklow settlement boundary. The development respects the established low-rise residential character along Briggs Lane and Dublin Road while delivering much-needed housing in a sustainable, well-serviced location. The feasibility study confirms service availability and identifies viable access solutions, including either upgrading the existing Briggs Lane / Dublin Road junction or providing a new entrance, subject to detailed design. Together, these measures support sustainable residential development without encroaching on the active floodplain.

Conclusion: The proposal aligns with flood-aware compact growth, good urban design and active-street objectives.

Overall Conclusion

The lands (c. 1.234 ac / 0.499 ha) at Briggs Lane / Dublin Road, Arklow are zoned “Existing Residential” and represent an infill development site within the designated settlement boundary. OPW CFRAM (Arklow AFA) mapping identifies fluvial influence from the Avoca River / Arklow Marsh, with Flood Zones A and B intersecting the southern low-lying portion of the lands and Flood Zone C (low probability) encompassing the northern and central areas. Mapped coastal tidal-water levels (TWLs) are approximately 2.99 m OD (0.5 % AEP) and 3.55 m OD (0.1 % AEP).

In accordance with the Planning System and Flood Risk Management Guidelines (DoEHLG / OPW, 2009), the layout confines all buildings to the higher northern Zone C and reserves the southern Zone A/B as public open space and SuDS infrastructure, ensuring no loss of floodplain storage or conveyance. All dwellings will be constructed with Finished Floor Levels (FFLs) set at 6.00 m OD, providing approximately 2.9 m freeboard above the OPW 0.1 % AEP extreme water level (3.02 m OD). Surface-water management will rely on infiltration in gravel subsoils, supplemented where necessary by attenuated discharge to the existing culvert serving the Arklow Marsh, with permeable surfacing and exceedance routing through the landscaped open-space belt.

Access and egress are maintained via Briggs Lane / Dublin Road along the higher northern boundary. An Emergency Flood Plan will address flood warnings, safe-access protocols, and plant isolation procedures. On this basis, the proposal does not increase flood risk elsewhere, minimises risk to people and property, and manages residual risk while aligning with wider planning objectives for compact, flood-aware urban growth in Arklow.

Flooding in this locality is driven primarily by fluvial and estuarine interactions, not by localised runoff or storage capacity. The Arklow Marsh system provides a large natural storage area, meaning that the limited fill required to achieve the 6.00 m OD platform will have no measurable effect on flood levels or conveyance. The volume of this floodplain compartment is many orders of magnitude greater than any site-level land-raising, and thus no discernible increase in water levels or backwater effects will occur on adjoining lands.

4.4 Historic Flood Events

The Office of Public Works (OPW) provides records of predictive and historic flood events, which have been reviewed as part of this assessment. Within the Arklow AFA, recorded flood events are primarily associated with the Avoca River and Arklow Marsh corridor, affecting low-lying areas closer to the estuary. No recorded flood events are identified at or immediately adjacent to the subject site on Briggs Lane.

Historically, localised ponding was observed on parts of the site, which was not attributable to river or coastal flooding but rather to a blocked drainage culvert discharging towards the Arklow Marsh. As noted in correspondence with Cllr. Pat Fitzgerald (October 2024), the culvert had become obstructed, impeding normal outflow and causing surface water to accumulate on the land. Following the clearance and reinstatement of the culvert, normal drainage has been restored and the site now drains freely to the marsh, with no evidence of residual flooding.

5 Hydrological Assessment

This study provides a comprehensive assessment of flood risk to the proposed development, evaluating the potential impacts from all relevant flood sources and considering the implications of climate change. It also outlines how flood risk to the proposed buildings can be effectively managed and mitigated through appropriate design, layout, and drainage measures.

5.1 Fluvial Flooding

The southern portion of the site lies within Flood Zones A and B, while the northern portion is located immediately adjacent to Flood Zone C. As the proposed development footprint is entirely confined to Zone C by raising the levels, the risk of fluvial flooding to the development is assessed as low.

5.2 Pluvial Flooding

Based on the available information from the OPW Flood Maps, there is no recorded or predicted pluvial flood risk in the immediate vicinity of the subject site. Surface-water runoff generated within the site will be managed through the proposed Sustainable Drainage Systems (SuDS) measures, as detailed in the accompanying civil engineering submission, ensuring that no localised flooding or uncontrolled discharge occurs either within the site or to adjoining lands.

5.3 Coastal Flooding

Coastal flooding refers to the inundation of low-lying land during exceptionally high tides or extreme storm events. While historic coastal and estuarine flooding has been recorded in the wider Arklow area, no such events are documented at or near the subject site.

The OPW CFRAM (Arklow AFA) mapping confirms that the site lies outside the mapped tidal flood extents, with extreme tidal-water levels (TWLs) of approximately 3.55 m OD (0.1% AEP).

The proposed development will maintain finished floor levels (FFLs) at or above 6.00 m OD, well above the design flood level, and will incorporate backflow protection on all outfalls.

Consequently, the tidal and coastal flood risk to the proposed development is considered low and effectively mitigated under both existing and future climate-change scenarios.

5.4 River Flooding

A river corridor associated with the Avoca River and Arklow Marsh system lies immediately south of the site and represents the principal potential source of fluvial flooding. The OPW CFRAM (Arklow AFA) mapping identifies flood extents confined to the southern low-lying portion of the lands, while the proposed development footprint is located within Flood Zone C (low probability of flooding) on the higher northern ground and by locally raising levels.

Accordingly, the proposed development is not considered at risk from river (fluvial) flooding, with the retained southern open-space and SuDS area providing an additional buffer to manage residual flood storage and conveyance.

5.5 Groundwater flooding

Where groundwater flooding occurs, it typically develops slowly and can persist for extended periods, often lasting weeks or months rather than hours or days. Although it rarely poses a direct risk to life due to its gradual onset, it can cause significant damage to property and services if not properly considered during design.

An intrusive ground investigation has not yet been undertaken at the site; therefore, site-specific groundwater levels remain to be confirmed and will be established during the detailed Site Investigation stage. The proposed development includes no basements or deep substructures, and the building footprints are located primarily within Flood Zone C on the raised northern platform. On this basis, and with the implementation of the SuDS strategy—which promotes controlled infiltration and discharge—the risk of groundwater flooding to the proposed development is considered low.

5.6 Road and Network Flooding

From the available information, there are no recorded instances of road-drainage flooding in the immediate vicinity of the subject site. No additional records of flooding associated with the site have been identified beyond the historic culvert-related ponding noted in the Historic Flood Events section, which has since been resolved following the clearance of the blocked outfall to the Arklow Marsh.

Sewerage flooding has been excluded from this assessment, as such events are typically localised and short-term, generally arising from blockages or unforeseen operational issues rather than predictable hydrological mechanisms. Consequently, they are not readily mappable within the context of a strategic flood-risk assessment.

Assuming the drainage networks operated by Uisce Éireann (Irish Water) and Wicklow County Council are maintained in good working order, the site is expected to remain at low risk from public sewer, road-drainage, or infrastructure failures.

5.7 Flooding to the site

Surface-water flooding can occur during intense rainfall events when runoff cannot drain through the existing system or infiltrate into the ground quickly enough, resulting in temporary overland flow or ponding. Surcharging of sewers or road gullies may also generate overland flows, which, if originating from higher surrounding ground, could pose a potential flood risk. To address this, exceedance routing will be incorporated to ensure any overland flow is safely directed away from buildings toward the designated open-space and SuDS areas.

Given that surrounding developments benefit from modern on-site drainage systems, no historic flood events are recorded at or near the site, and the natural topography falls gently southwards from Briggs Lane / Dublin Road, there is no additional surface-water flood risk to the proposed development footprint.

5.8 Flooding from the site

The design team is responsible for ensuring that the proposed development does not increase flood risk elsewhere. The surface-water drainage network will be designed to provide sufficient capacity to convey all flows arising from the development, preventing any adverse impact on the environment, ecosystems, buildings, essential services, or adjoining properties.

This requirement is comprehensively addressed through the site-specific Surface Water Management Strategy, which incorporates Sustainable Drainage Systems (SuDS) to manage runoff volume, rate, and quality. The proposed measures ensure a minimal risk of increased flow or contaminant discharge from the site, achieving compliance with best practice drainage design and maintaining greenfield-equivalent runoff conditions.

6 Communal Flood Protection Measures

Arklow is influenced by a combination of natural coastal and estuarine defences, including the existing embankments and the extensive Arklow Marsh system, which provide attenuation and buffer capacity during high-tide and storm-surge events. While these features reduce the likelihood of coastal flooding, a residual risk remains, particularly when considering potential future sea-level rise. This assessment therefore does not rely on third-party or future defences in determining the site's flood risk.

The OPW Arklow AFA Flood Risk Assessment identifies that low-lying lands adjacent to the Avoca River and estuarine corridor are most susceptible to tidal and fluvial interaction during extreme events. However, the subject site lies outside the mapped coastal flood extents, and any risk is limited to the lower open-space area, which is intentionally designated for SuDS and exceedance storage.

Any future flood-risk management measures for Arklow will be advanced by the OPW and Wicklow County Council, subject to national appraisal and statutory approvals. No reliance is placed on prospective flood-defence works within this report.

Typical coastal flood-management options in similar urban estuarine settings include embankments, flood walls, demountable barriers, local road or ground raising, tidal control structures, and channel conveyance improvements, all designed with climate-change allowances in accordance with OPW guidance. Where such measures are introduced in Arklow, their standard of protection and residual risk will be defined at the project design and consenting stage. This Flood Risk Assessment does not assume any increase in protection arising from potential future schemes.

7 Mitigation

7.1 Fluvial and Coastal Floods

The primary mitigation measure is to locate all buildings within the raised higher northern portion of the site (Flood Zone C) and to set finished floor levels (FFLs) above the 1 % AEP + climate-change fluvial design level, incorporating suitable freeboard. A site-wide minimum FFL of 6.00 m OD is adopted, providing approximately 2.9 m of clearance above the OPW 0.1 % AEP (extreme) fluvial/tidal level of 3.02 m OD identified for the Arklow AFA. Service penetrations will be sealed, and threshold drains and kerb upstands will be installed to control exceedance flows at entrances and prevent ingress during heavy rainfall.

Flood barriers/defences:

No permanent flood walls or berms are proposed or required, as the mitigation strategy relies on site-level raising to achieve the necessary flood protection standards. This approach eliminates dependency on third-party defences while ensuring a robust and self-contained solution.

Landscaping and drainage:

Site grading will direct runoff away from buildings toward the designated SuDS features, ensuring that exceedance flows are captured and conveyed safely without discharging directly to the southern floodplain. Key measures include permeable construction for hard surfaces, infiltration and attenuation systems, and strategic landscape planting to slow, filter, and treat surface runoff before controlled outfall to the existing culvert discharging to the Arklow Marsh.

All dwellings will be constructed with FFLs at 6.00 m OD, with local grading providing a minimum 150 mm threshold upstand above adjacent ground levels, as illustrated on the Proposed Site Layout Plan.

Floodplain behaviour:

Flooding in this locality is governed primarily by fluvial and estuarine dynamics rather than local surface-water storage. The Arklow Marsh provides a large, naturally connected flood-storage compartment, meaning that the limited volume of land-raising required to achieve the 6.00 m OD platform will have no measurable impact on flood levels or conveyance. The storage capacity of the marsh system is orders of magnitude greater than the proposed fill volume; therefore, no discernible backwater effect or level increase will occur on adjoining lands.

7.2 Groundwater Floods

No additional flood mitigation is required.

7.3 Surface Water to the site

No additional flood mitigation is required.

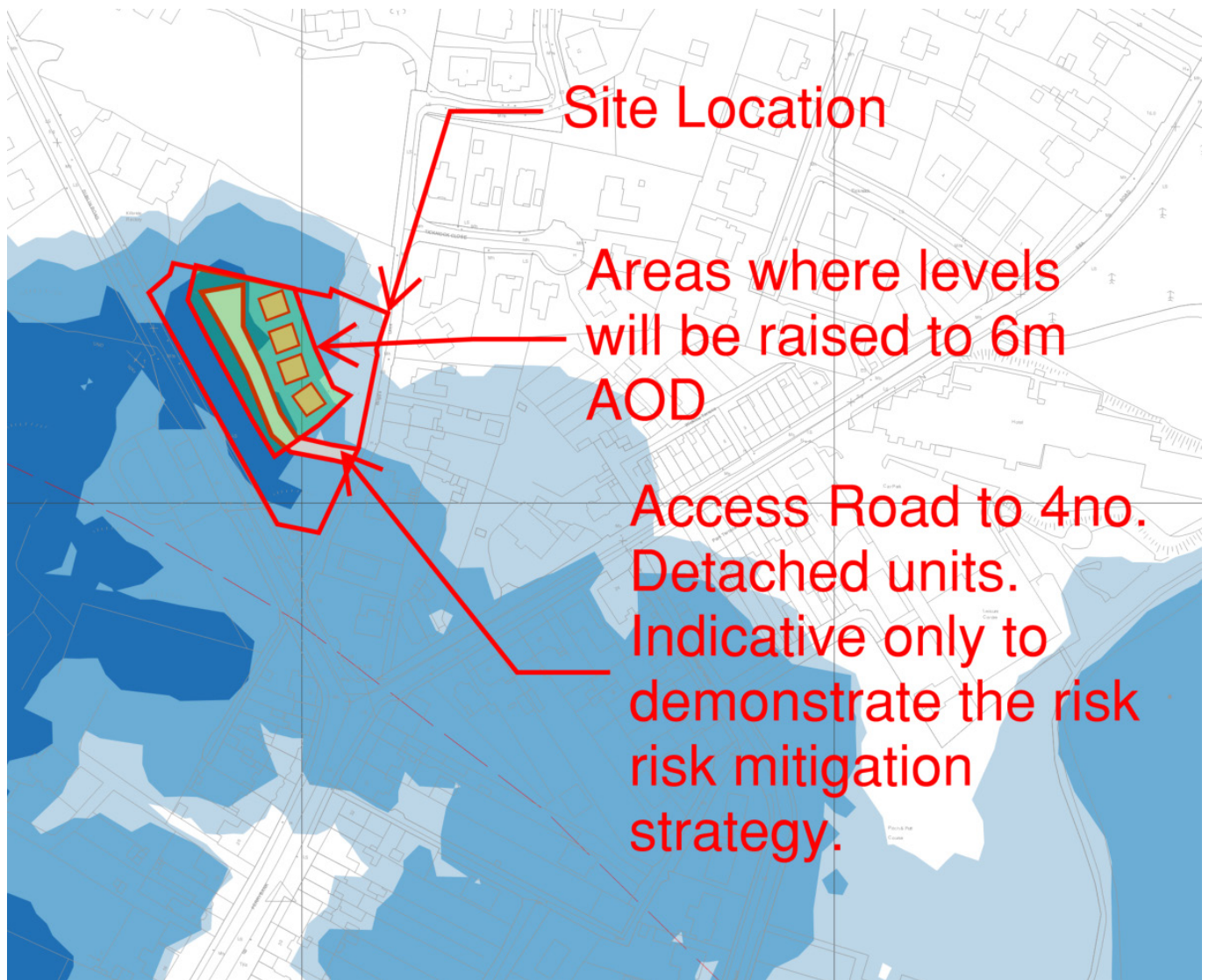
7.4 Surface Water from site

The proposed surface-water management strategy has been developed to ensure that the new development does not increase flood risk elsewhere. The approach is robustly addressed through the site-specific Surface Water Strategy, incorporating Sustainable Drainage Systems (SuDS) designed to manage runoff volume, rate, and quality.

Where feasible, green-blue roof elements or equivalent attenuation measures will provide on-site storage capacity, limiting discharge rates to greenfield-equivalent levels. Threshold drains (e.g., ACO-type channels) and local falls away from door openings will prevent stormwater accumulation adjacent to buildings.

The residual flood risk is considered low, and no further mitigation is required beyond standard SuDS maintenance and inspection regimes. The final design of the surface-water drainage networks will comply with the relevant codes, standards, and regulatory requirements set out by the Office of Public Works (OPW), Wicklow County Council, Building Regulations, and Uisce Éireann (Irish Water), incorporating appropriate climate-change allowances in accordance with national guidance.

8 Appendices



Realt na Mara
Ocean Crest
Arklow

28/10/2024

Attention of:

Councillor Pat Fitzgerald

Dear Pat,

Further to our telephone conversation please find an outline of the issues regarding my site located at Briggs Lane Arklow and the new Local Area Plan 2028:

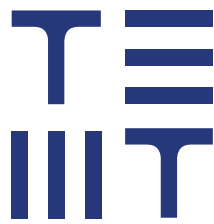
1. I restored and developed the building on Briggs Lane now occupied by Rehab in 1999.
2. There was a planning application on the site by me in early 2000;
3. The only basis of refusal at the time was the buildings were the aesthetics of the apartment building and density; In the year 2001 Mr. Martin Hamm Consulting Engineer met Council Engineer Tom Moynihan and any issues regarding drainage of the site were discussed and resolved to both sides satisfaction.
4. Since then a culvert from the land into the marsh was blocked on the Circle K side of the road (possibly deliberately) which resulted in water being held on the land. Recently, when works began on the marsh entrance this culvert was cleared and all the water from my land was released into the marsh. This culvert had been in place for decades and its recent unblocking now has resulted in the land drying out. With further clearing of the culvert I am in no doubt that the site will not be a flood risk. I understand that the flood assessments undertaken would not have known this issue but now, considering this re-opening of the culvert, I will be asking for the zoning of my land to remain residential;
5. The planning, flood risk consultants, Mr. Michael Hand Managing Director of PH McCarthy Consulting Engineers, whose company was employed by the council at the time to prepare a flood study report visited the site with my father (Christy Maher, now deceased) and stated that from an engineering / flood risk viewpoint he had no issue with the site; I would reiterate that in 2001 Mr. Martin Hamm Consulting Engineer met Council Engineer Tom Moynihan and any issues regarding drainage of the site were discussed and resolved to both sides satisfaction.
6. I am of the opinion that the blocking of the culvert may also have been a contributing factor in water remaining on the Dublin Roadway.
7. My three children have grown up in Arklow and are involved in the community. This is the 3rd generation of our family to live in Arklow. They have expressed an interest in remaining in Arklow and building their homes on my site.;
8. With the development of the flood defence plans along with the new Water Treatment plant this site is now a prime residential site within a 5 minute walking time of the town centre, and finally
9. If affordable, I will be having a planning consultant prepare a submission for the LAP.

I would ask you to review the information I have brought to your attention in this letter and hopefully discuss it with the relevant personnel in the Council so that the residential zoning will continue for this site.

I am asking you, Pat, to bring this letter to the attention of the relevant personnel in the council and request that they revisit the site at a time convenient to both them and me to review the issue.

Kind Regards

Paul Maher FCA



TENT ENGINEERING



TENT ENGINEERING