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Name:	Echelon Data Centres
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- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART B Settlement Specific Objectives.

- B.4 Economic Development & Employment

Maps:

- Land Use Map

Maps:

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Submission regarding Lands at Avoca River Park.pdf, 2.36MB

Submission

In respect of

**Lands at Avoca River Park
Arklow, Co. Wicklow**

Prepared for

Echelon Data Centres

Prepared by

John Spain Associates

November 2025

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1.0 INTRODUCTION

This submission has been prepared in relation to the policies and objectives, including zoning, of lands at Avoca Park, Arklow, under the Draft Arklow Local Planning Framework 2025 (LPF), on behalf of Echelon Data Centres of 1st Floor, Silverstone House, Ballymoss Road, Sandyford Business Park, Dublin 18.

Under the Arklow Local Area Plan 2018-2024 (LAP), the subject lands were zoned E1 Employment and are part of lands identified as the 'Employment Opportunity Site at Shelton'. However, the Draft Arklow Local Planning Framework 2025 / Proposed Variation No. 5 Wicklow County Development Plan 2022 – 2028, which, when adopted, will replace the Local Area Plan, has proposed to change the zoning of part of the subject lands to OS2 'Natural Areas zoned land'.

This submission requests the lands retain the E1 employment zoning as in the Local Area Plan, that the north-western portion of the lands in the client's ownership which is currently not subject to any zoning is zoned E1, and that a specific objective(s) for the lands is introduced in the LPF which recognises the permitted ICT Facility, Energy Centre and associated infrastructure uses on the lands and continues to facilitate this employment development type.

The report begins with a brief introduction to the lands, it then outlines the relevant planning history of the lands to demonstrate what is currently permitted on the lands, before discussing the zoning of the site under the Arklow and Environs Local Area Plan 2018-2024 and the proposed zoning under the Draft Arklow Local Planning Framework 2025. The grounds of this submission are set out in the final section of the report, but can be summarised as follows:

- There is extant permission on the majority of the lands proposed to be rezoned OS2 Natural Areas. This application was lodged and granted permission in line with the previous E1 zoning under the LAP 2018-2024, and these lands have been cleared in line with this permission to prepare for development. As such it is considered these lands do not constitute natural areas and the permitted use on the lands will better contribute to meeting the objectives of E1 zoned land as opposed to OS2 zoned lands, supporting the submission that the lands should remain zoned E1.
- It is also considered that OS2 zoned land is not necessary in this location as there is substantial buffer and distance between the subject lands and the next closest buildings to the site to north, with ample OS2 zoned land remaining where it is necessary along the east and south of the lands providing a buffer to the road and river respectively.
- The re-zoning of the north-western portion of the lands in the client's ownership to E1 is proposed to provide for a consistent land use across the lands in a single ownership and support development in line with E1 objectives in this location.
- It is considered that a specific objective for the subject lands which supports large-scale / space extensive, and high technology employment development should be included in the LPF for our client's wider landholding at Avoca River Park, as there are now a number of extant permissions on the subject lands which together make up a large-scale employment development and a specific objective which supports this would ensure that such development can continue to be facilitated on the lands.

It is respectfully requested that Wicklow County Council consider retaining the E1 zoning at the north-eastern part of the lands and the minor expansion of the E1 zoning as described in this submission as well as the inclusion of a specific objective for the subject lands which continues to support the employment development on the lands when reviewing the Draft Arklow Planning Framework and Variation to the Wicklow County Development Plan.

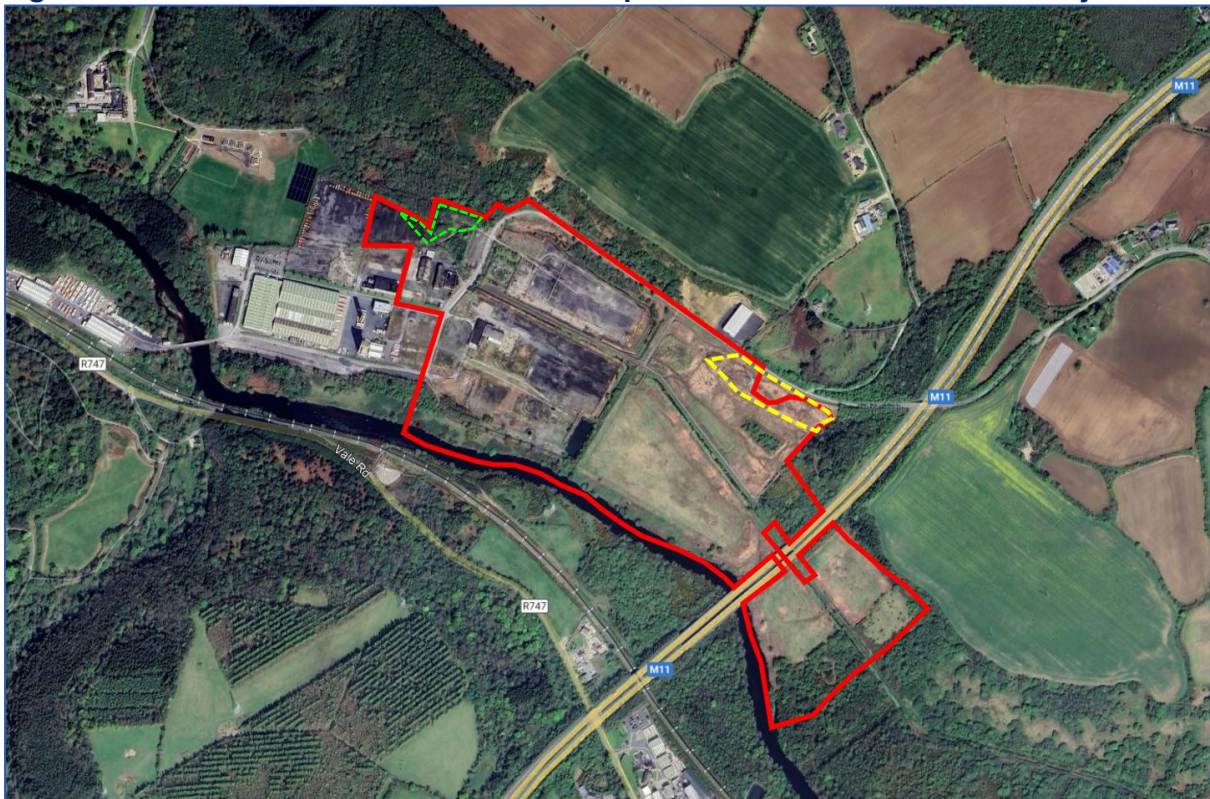
2.0 THE SITE & CONTEXT

The subject lands comprise lands at Avoca River Park, Arklow, within the townlands of Shelton Abbey and Marsh, as indicated by the lands bound in red in the figure below. These lands are in the ownership of Echelon Data Centres.

The portion of these lands which have been proposed to be rezoned OS2, and therefore to which much of this submission primarily relates, is located at the north-eastern edge of the lands along the access roads to Avoca River Park, as indicated by the area bound by the yellow dashed line in the figure below.

The portion of these lands which is currently not subject to any zoning is indicated by the area bound by the green dashed line in the figure below.

Figure 2-1: Aerial View of Lands in Ownership of Echelon Data Centres & Subject Site



3.0 RELEVANT PLANNING HISTORY

Our client has made a number of planning applications on the subject lands, with the view of delivering a coordinated development of ICT facilities, energy centres, and a substation to support these uses on the lands.

The following sections outline the extant permissions and ongoing applications on these lands relevant to the submission.

3.1 EXTANT PERMISSIONS

Wicklow County Council Reg. Ref.: 21/1080

On 31st August 2021, Crag Digital Avoca Limited applied to Wicklow County Council (WCC) for permission for development on a site at Avoca River Park, Arklow, Co. Wicklow.

Figure 3-1: Site Location Map Reg. Ref. 21/1080



A full ten-year permission was sought for the following development:

- *"All site clearance and enabling works required to facilitate the development.*
- *Construction of 2 no. energy centre buildings (Energy Centre 1 and Energy Centre 2) each with a height to parapet level of c. 13.85 metres.*
- *Energy Centre 1 will comprise a gross floor area (GFA) of 5,965 sq.m. within a single storey building and will accommodate 12 no. generators. 4 no. flues 33 metres in height will be accommodated along with south-western elevation of the building.*
- *Energy Centre 2 will comprise a GFA of 9,180 sq.m. within a single storey building and will accommodate 18 no. generators. 6 no. flues 33 metres in height will be accommodated along the south-western elevation of the building.*

- Construction of a battery compound to provide electricity storage and backup power, located to the northeast of Energy Centre 2, to comprise 27 no. battery arrays within a compound area of c. 0.7 hectares. A single storey MV switch-room building (c. 181 sq.m. GFA) will be provided to the west of the battery compound.
- Provision of a transformer compound (to the northwest of Energy Centre 1), along with a welfare building (c.38 sq.m. GFA).
- Provision of fuel storage tanks (2 no.) within a bunded compound to the north of Energy Centre 2.
- Construction of a new access from the existing estate access road to the north of the site, internal road network and circulation areas, footpaths, provision of 6 no. car parking spaces and 4 no. cycle parking spaces.
- Landscaping and planting, boundary treatments, lighting, security fencing and all associated ancillary and site works including underground foul and storm water drainage network (including on-site wastewater treatment system) and utility cables."

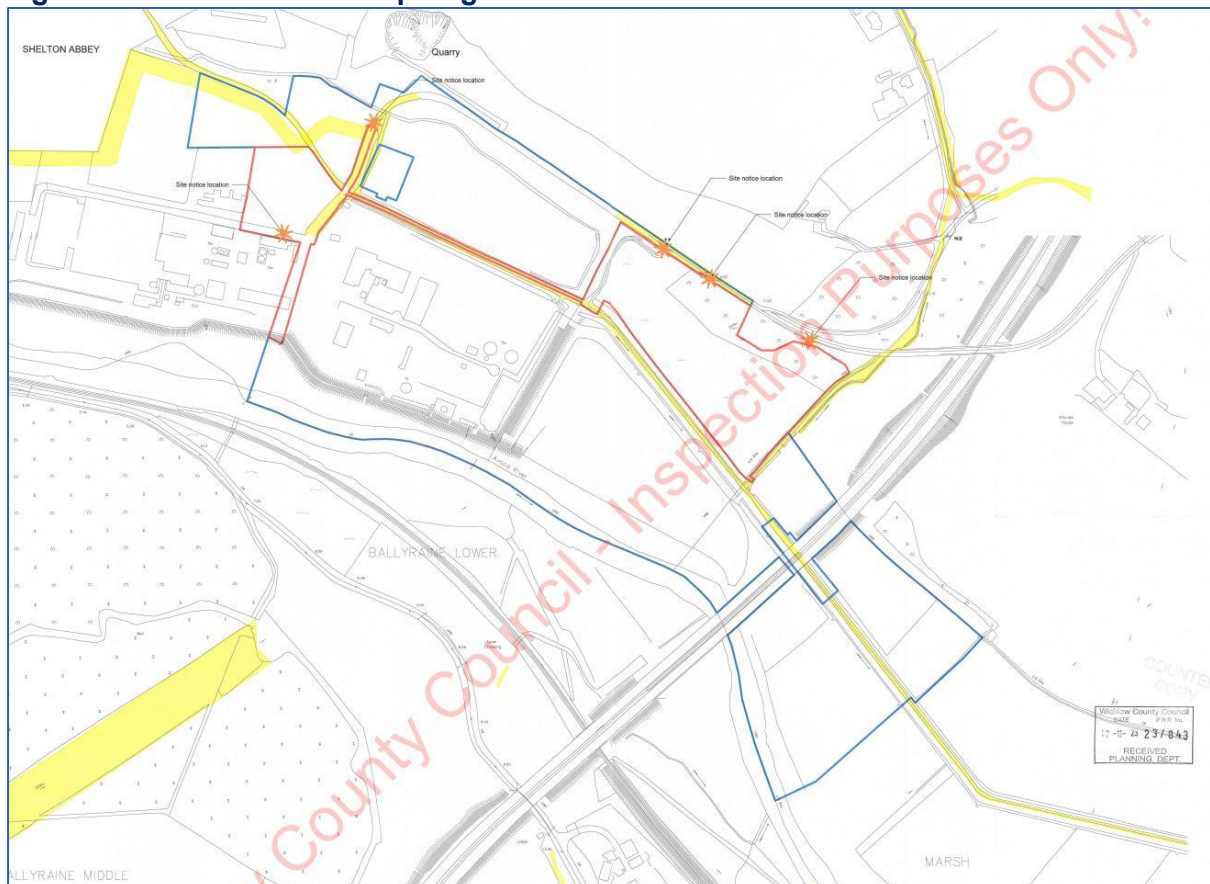
WCC requested Further Information in relation to emissions, EIAR related matters, climate change mitigation, Sustainable Urban Drainage Systems (SuDS), flooding and section drawings of roads. The applicant issued a Further Information response on 15th May 2022.

WCC issued a final grant of permission on 15th June 2022 subject to 23 conditions.

Wicklow County Council Reg. Ref.: 23/843

On 17th November 2023, Crag Digital Avoca Limited applied to WCC for permission for development on a site at Avoca River Park, Arklow, Co. Wicklow. This application included an amendment to the permitted development described above (Reg. Ref. 21/1080).

Figure 3-2: Site Location Map Reg Ref. 23/843



The development consisted of the following:

“The proposed development includes an amendment to the development permitted under Reg. Ref. 21/1080. The proposed development will consist of the following to facilitate the above.

- Demolition of the existing structures on the western part of the site that comprises 4 no. industrial commercial buildings, an associated hut / outbuilding, a gas enclosure, and a tank with bund wall.*
- The removal of the remains of a previously demolished building, areas of hard standing, and existing surface treatments.*
- The relocation of the Energy Centre 1 to the western part of the site, which will supersede the previously permitted 110kV GIS substation compound at that location under ABP Ref: VA27.309252.*
- The proposed development will provide for a revised energy centre design, to include the provision of 8 no. gas turbines (with associated flues of 25.15m in height); 4 no. black start emergency generators and associated transformers, 2 no. single storey fuel oil pump rooms with a gross floor area (GFA) of 90.17sq.m; A single storey air compressor building with a GFA of 88.9sq.m; 4 no. fuel tanks, 2 no. MCC control rooms with a GFA of 44.17sq.m, 3 no. fire water tanks, a single storey welfare, storage, and pump room building with a combined GFA of 160.97 sq.m; A two storey MV /LV building with a GFA of 655.54sq.m; 8 no. 11kV/ 33kV step-up transformers in the north of the site, water treatment equipment, and a security hut, all within a fenced compound.*
- The proposed development includes landscaping and planting, boundary treatments, lighting, security fencing, car parking, and all site works including underground foul and storm water drainage network (including on-site wastewater treatment system), and utility cables, along with all associated and ancillary works.*

An EPA- Industrial Emissions Directive (IED) licence will be applied for to facilitate the operation of the proposed development.”

WCC requested Further Information on 15th January 2024 in relation to the wastewater treatment system and dangerous substances stored on site. The applicant submitted a FI response on 7th March 2024.

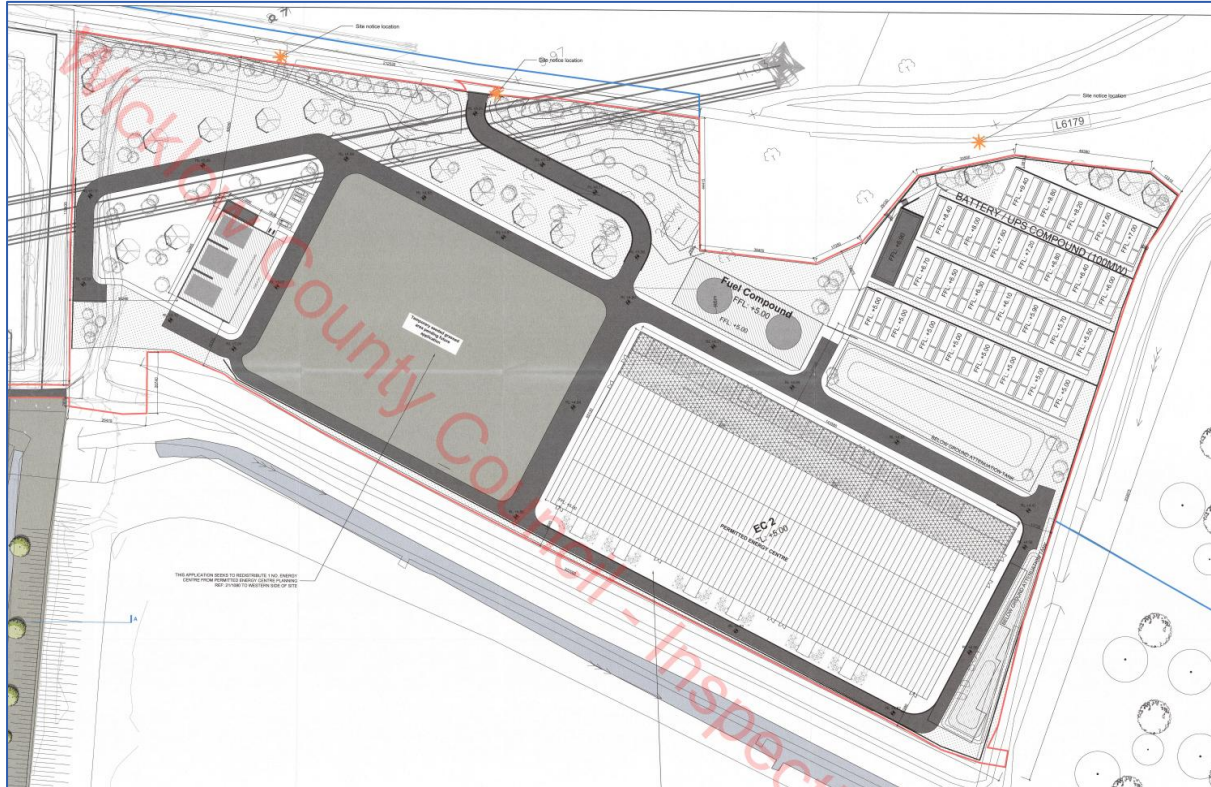
WCC issued a final grant of permission on 4th April 2024 subject to 2 conditions.

3.2 OTHER PERMISSIONS AND APPLICATIONS

The wider landholding also encompasses lands on which an ICT Facility Development is permitted under Reg. Ref.: 23/72. That development, which comprises 3 no. ICT Facility buildings and associated infrastructure, is due to commence construction in the near future.

3.3 SUMMARY

In summary, there is an extant permission for an energy centre on the north-eastern portion of the landholding. This extant permission covers a large portion of the lands proposed to be zoned OS2, as can be seen in the site layout as permitted under WCC Reg. Ref. 23/348 shown below.

Figure 3-4: Permitted Site Layout under Reg. Ref. 23/843

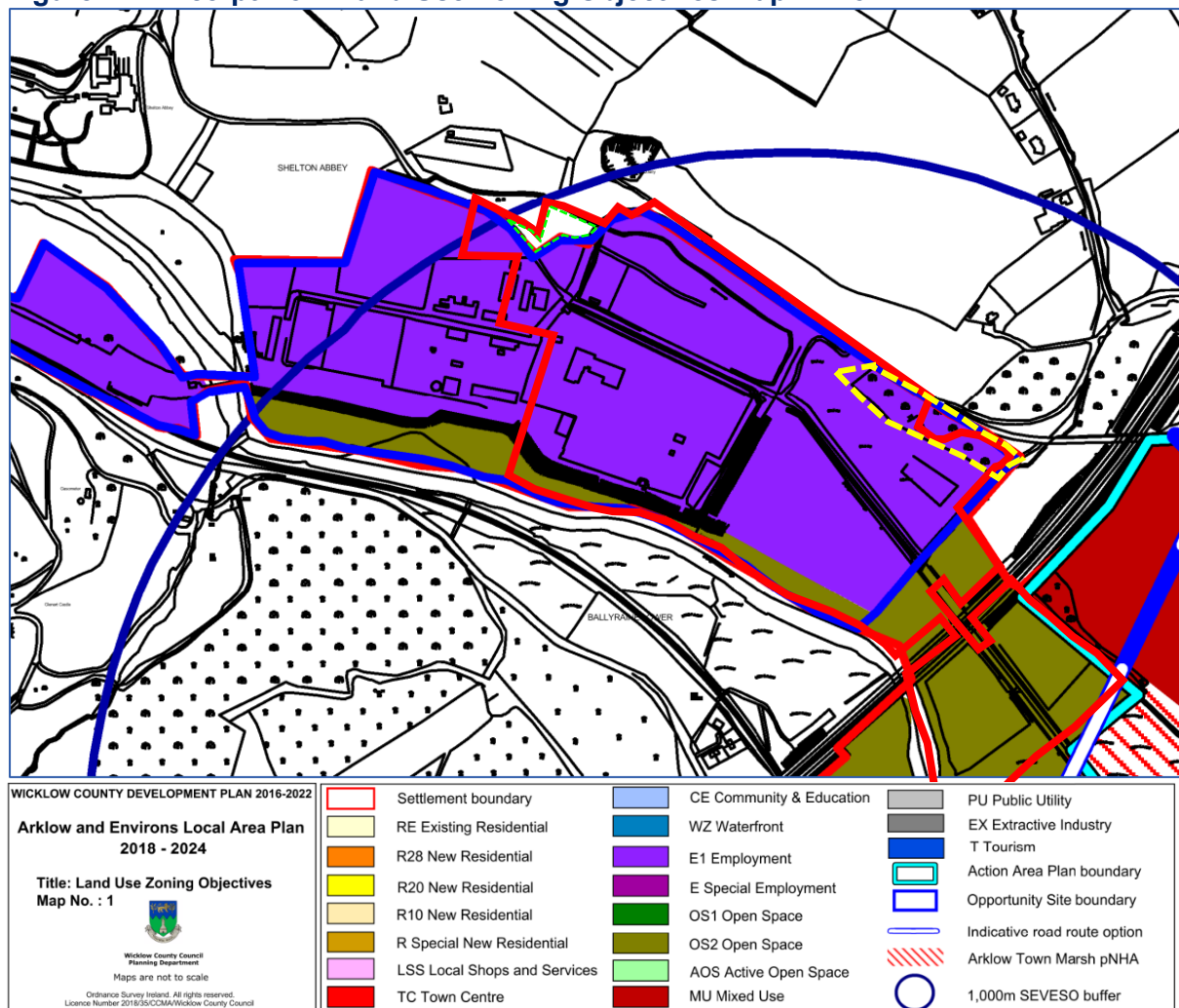
4.0 ARKLOW AND ENVIRONS LOCAL AREA PLAN 2018-2024

The *Arklow and Environs Local Area Plan 2018-2024* (Arklow LAP) was published in 2018. The purpose of the plan was to put in place a land use framework to guide the future sustainable development of the settlement of Arklow town and its environs for the 2018-2024 period.

The planning applications outlined in the previous section were made in accordance with the Arklow LAP.

4.1 ZONING

Figure 4-1: Excerpt from Land Use Zoning Objectives Map Arklow LAP



Under the Arklow and Environs LAP, the majority of the subject lands are zoned E1 Employment, the objective of which is *“To provide for the development of enterprise and employment”*. The description for the zone is:

“To facilitate the further development and improvement of existing employment areas and to facilitate opportunities for the development of new high quality employment and enterprise developments in a good quality physical environment”

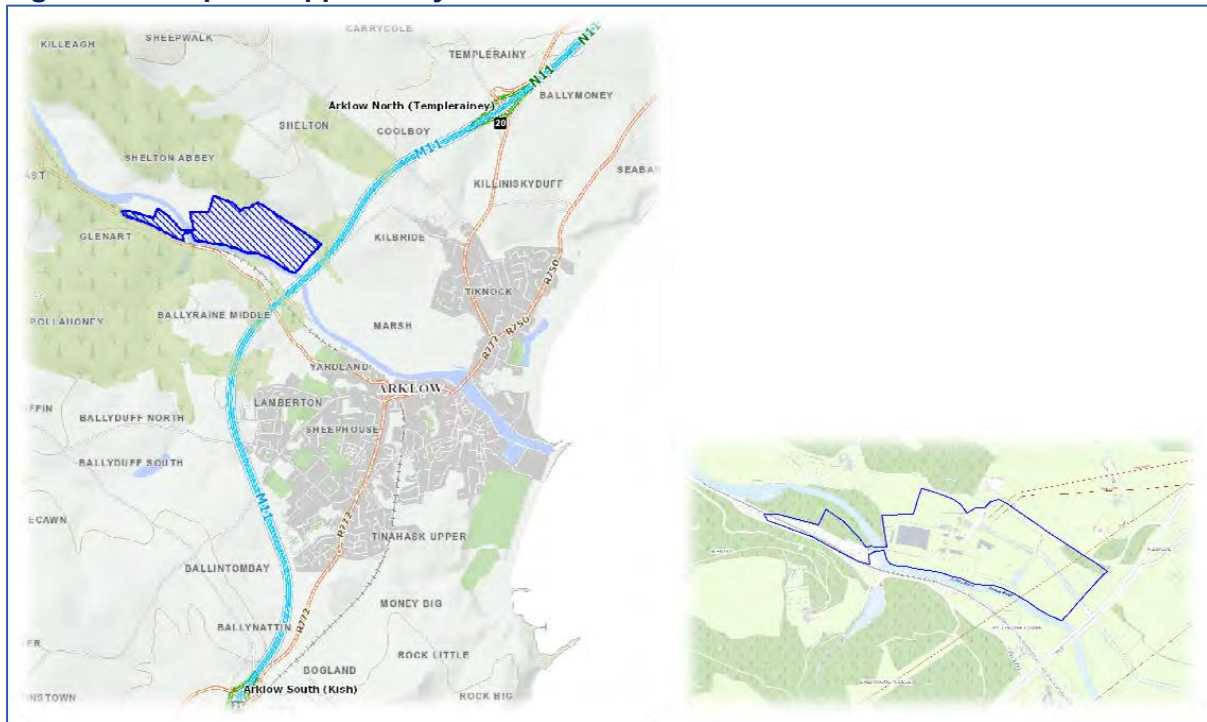
Permissible uses under the applicable zoning include general and light industry, office uses, enterprise units, appropriate warehousing, petrol filling stations (as deemed appropriate),

public transport depots, open space, community facilities, educational, utility installations and ancillary development for employment and industry uses in accordance with the CDP.

4.2 EMPLOYMENT OPPORTUNITY SITE

In addition to the E1 zoning described above, under Chapter 4 Economic Development & Employment, the subject site is part of a larger site identified as the Employment Opportunity Site at Shelton.

Figure 4-2: Maps of Opportunity Site at Shelton



The Plan states the following:

“This site is located in Shelton Abbey Townland, west of Arklow town and to the west of the M11 motorway. It was the site of the Irish Fertiliser’s Industry (IFI) factory which operated from here from the 1960’s to the 2000’s. When in operation it was a thriving industry with a significant number of employees and had direct access to the rail network for freight. The site has a number of distinct businesses operating from same.

While this site is outside of the town’s ‘natural’ western boundary, the N11, the fact that it is a brownfield site, previously occupied by intensive industrial users and given the availability of services to the site such as a natural gas supply line, high voltage electricity supply with a direct 110kv connection to the national grid and potential direct access to the Dublin to Rosslare train line to the south, it is considered suitable for designation for significant redevelopment for employment purposes. Vehicular access is from the Beech Road/L6179 to the north. The site also benefits from a scenic setting with Shelton Abbey ground to the west and Glenart Castle and grounds to the south.

The site is zoned ‘E1 Employment’ and measures 48.7ha in total (including all existing buildings thereon). The site is suitable for a significant employment / industrial development. Lands are zoned ‘Open Space 2’ on the southern and eastern sides of the employment zone (43.7ha) to provide an undeveloped buffer along the river, for the floodplain, the Town Marsh pNHA and the set back from the motorway.”

The objectives for the employment lands at Shelton Abbey are:

- To promote and facilitate the development of this site for a large-scale employment development,
- To facilitate the current business park use,
- Any significant development proposal for this site shall incorporate proposals to develop a landscaped linear open space park along the river bank.

5.0 DRAFT ARKLOW LOCAL PLANNING FRAMEWORK / PROPOSED VARIATION NO. 5 TO WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028

Wicklow County Council published the Draft Arklow Local Planning Framework (LPF) in October 2025. When adopted, the Arklow Local Planning Framework will replace the Arklow Local Area Plan 2018-2024.

Wicklow County Council are seeking to make a variation to the Wicklow County Development Plan 2022-2028, to integrate the LPF into the Development Plan. When adopted, the LPF will vary parts of the Written Statement (Volume 1) of the Development Plan and form part of Volume 2, Town Plans.

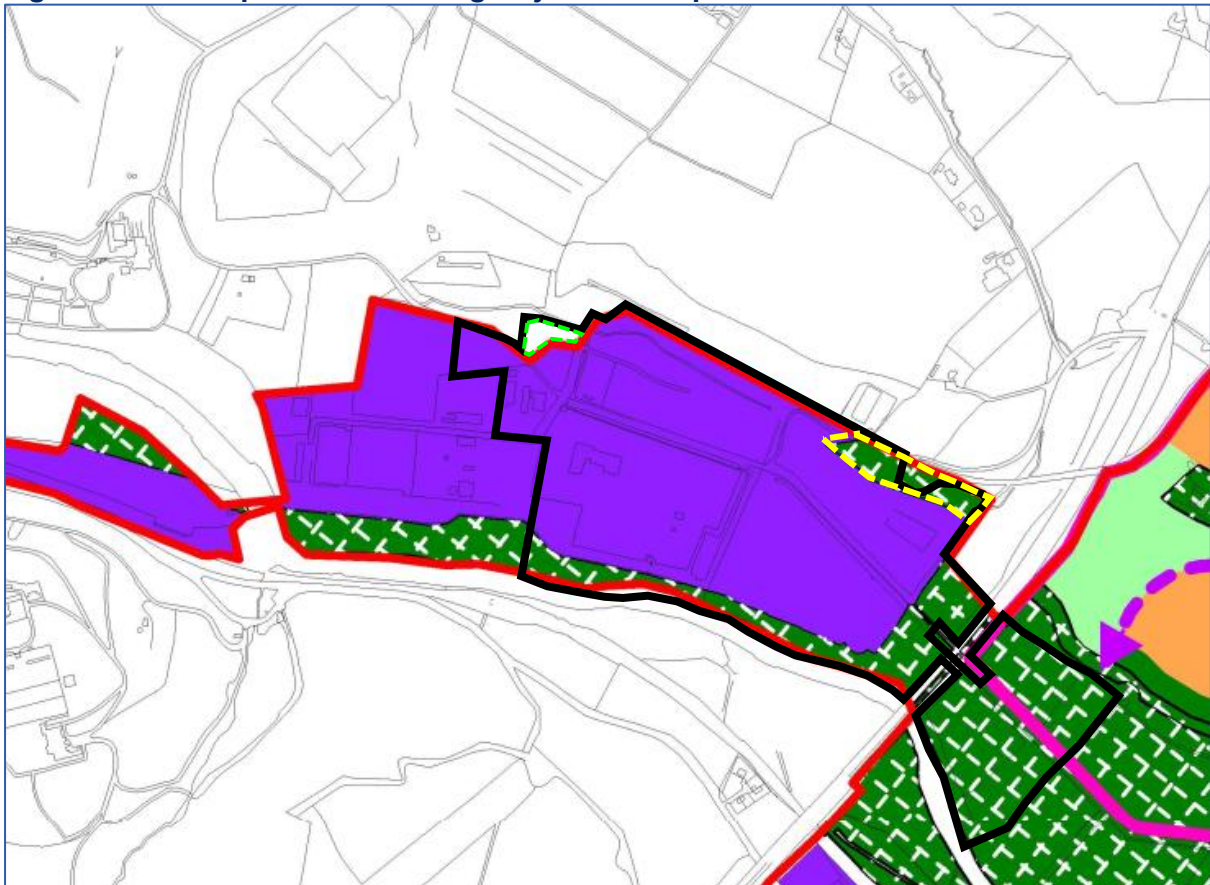
The Draft LPF states:

“The purpose of this LPF is to put in place a land use framework that will guide the future sustainable development of the settlement of Arklow as shown on Land Use Map No. 1 appended to this document. This LPF, in conjunction with the County Development Plan will inform and manage the future development of the LPF area.”

The previous local area plan for the town was prepared in 2018. This LPF will build upon the successful strategies and objectives developed in the previous plan but will adapt where necessary to reflect updated national and regional planning policy and guidance, and emerging planning issues”

5.1 PROPOSED ZONING

Figure 5-1: Excerpt of Draft Zoning Objectives Map



(Subject lands outlined in black, proposed areas to be rezoned outlined in yellow & green)

Under the Draft Local Planning Framework, the majority of the lands in the ownership of Echelon Data Centres remain E1 Employment zoned land. The objective and description of this zone remain unchanged.

However, under the Draft LPF, a portion of the subject lands at the north-east of the site (as indicated by the yellow dashed line in Fig. 5-1) is proposed to be rezoned 'OS2 Natural Areas', the objective of which is *"To protect and enhanced existing open, undeveloped lands"*. The description for this zone is:

"To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity."

The appropriate uses for OS2 Natural Areas zoned lands are described as:

*"Uses appropriate for **natural areas (OS2)** zoned land are uses that protect and enhance the function of these areas as flood plains, buffer zones along watercourses and rivers, green breaks between built up areas, green corridors and areas of natural biodiversity. The development of these lands for recreational uses may only be considered where such use is shown to not undermine the purpose of this zoning in accordance with the CDP and applicable Local Plan / Framework"*

A small portion of the subject lands at the north-western corner remains unzoned.

5.2 OTHER PROPOSED CHANGES

It is worth noting that in the Draft LPF, the wider lands at Avoca Park are no longer specifically identified as an 'Employment Opportunity Site', namely the 'Employment Opportunity Site at Shelton'. In fact, Employment Opportunity Sites as identified in the LAP do not exist in the Draft LPF at all.

In relation to the lands at Avoca Park, this is likely due to the fact that as Council have recognised, and as is clear from the planning history outlined in Section 3, substantial parts of these lands now have extant planning permissions. However, notwithstanding this, it is considered that an explicit recognition of the strategic nature of these lands for ICT Facility development would be appropriate, as they are destined to see very significant levels of investment over the coming years.

Table B:4.3 Part Developed Employment Lands identifies the lands at Avoca River Park that are developed, have extant permission or are undeveloped.

Table B:4.3 Part Developed Employment Lands

Part Developed Employment Lands	Developed Area (ha)	Undeveloped area (ha)
Kish Business Park	5.4	8.6 (Extant permission not commenced c. 5.7ha)
IDA Business Park, Ballynattin	10	14 (Extant permission not commenced c. 0.5ha)
Avoca River Park	19	22.5 (Extant permission not commenced c.17.7 ha)

6.0 GROUNDS OF SUBMISSION

6.1 SUBMISSION

It is respectfully requested that the subject lands retain the E1 Employment zoning as set out in the LAP, in the new Arklow Local Planning Framework, i.e. the north-eastern part of the subject lands is **not re-zoned** OS2 Natural Areas in the Arklow Local Planning Framework.

It is also requested that the currently unzoned portion of the subject lands at the north-western edge is zoned E1 to be consistent with adjoining lands in the same ownership.

Additionally, in light of the removal of the designation of the wider lands at Avoca River Park as an Employment Opportunity Site and its associated objectives, it is requested that a specific objective(s) which recognises, aligns with and continues to support the permitted and emerging development on the lands is included in Section B:4 Economic Development and Employment of the Arklow Local Planning Framework. The specific objective could read similar to that for the Employment Opportunity Site:

*“To **continue to promote and facilitate the development of this site for a large-scale employment development, including ICT Facility development and associated infrastructure.**”*

This would be particularly appropriate given the site's close alignment with the Government Statement on the Role of Data Centres in Ireland's Enterprise Strategy, which promotes data centre development in regional locations and 'energy parks'. The lands in question represent an 'energy park' location, having regard to the co-location of the ICT Facilities with on-site energy centres, battery energy storage systems, and the integration of these aspects of the development with the on-shore infrastructure for a large scale offshore windfarm (Arklow Bank windfarm).

6.2 GROUNDS OF SUBMISSION

The majority of the lands proposed to be rezoned OS2 Natural Areas are in the ownership of Echelon Data Centres and, as outlined in section 3 above, there is an extant permission the subject site (Reg. Ref. 21/1080 as amended by Reg. Ref. 23/843. The figure below illustrates the site layout plan in the context of the proposed zoning of the Draft Arklow LPF.

As can be seen in Fig. 6-1, development has been permitted across the majority of the area proposed to be re-zoned OS2.

Additionally, as can be seen in the aerial view, the site has been cleared in line with the extant permission to facilitate the permitted development, including the area proposed to be rezoned. The lands were previously used as landfill associated with industrial uses and had recolonised with scrub and low-lying vegetation, however this is no longer existing.

As such it is considered that these lands should retain their E1 employment zoning as this reflects the uses permitted on the site under the extant permission and, as the site has already been cleared in line with this permission, it offers limited value in terms of a natural area and therefore would not align with OS2 objectives. The zoning of this area OS2 would also render the already permitted development at this location a 'non-conforming use', which would not be in accordance with the principle of orderly and appropriate zoning.

It is also noted that the lands along the eastern and southern side of the subject lands remain zoned OS2 in the Draft LPF. These lands provide ample natural areas across the wider development site, which meet the objectives for OS2 lands providing a buffer along the River Avoca and along M11. It is not considered that there is a need for additional OS2 zoned lands,

especially given that the lands north of the subject site are unzoned and agricultural in nature providing ample buffer between the site and dwellings further north of the site at Shelton.

Figure 6-1: Excerpt of Map Showing Extant Permission in Context of Proposed Zoning

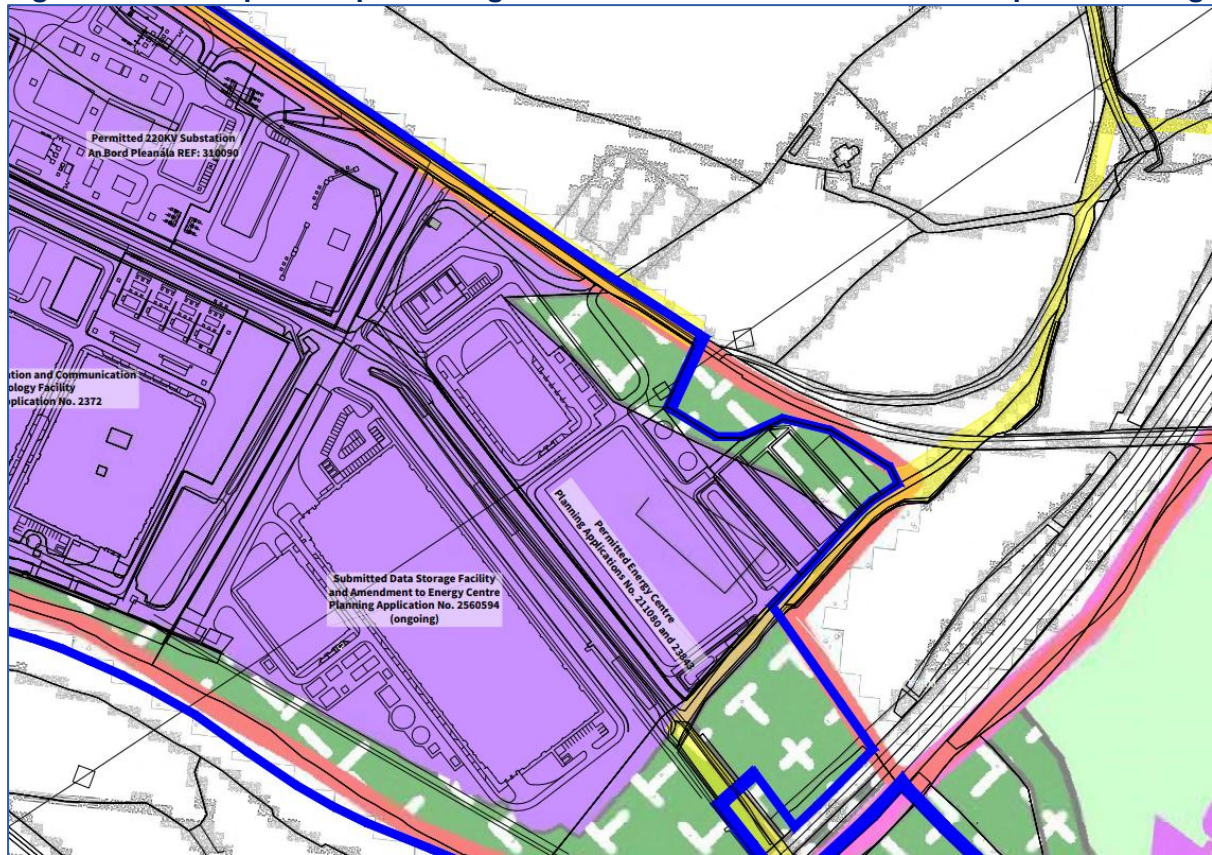


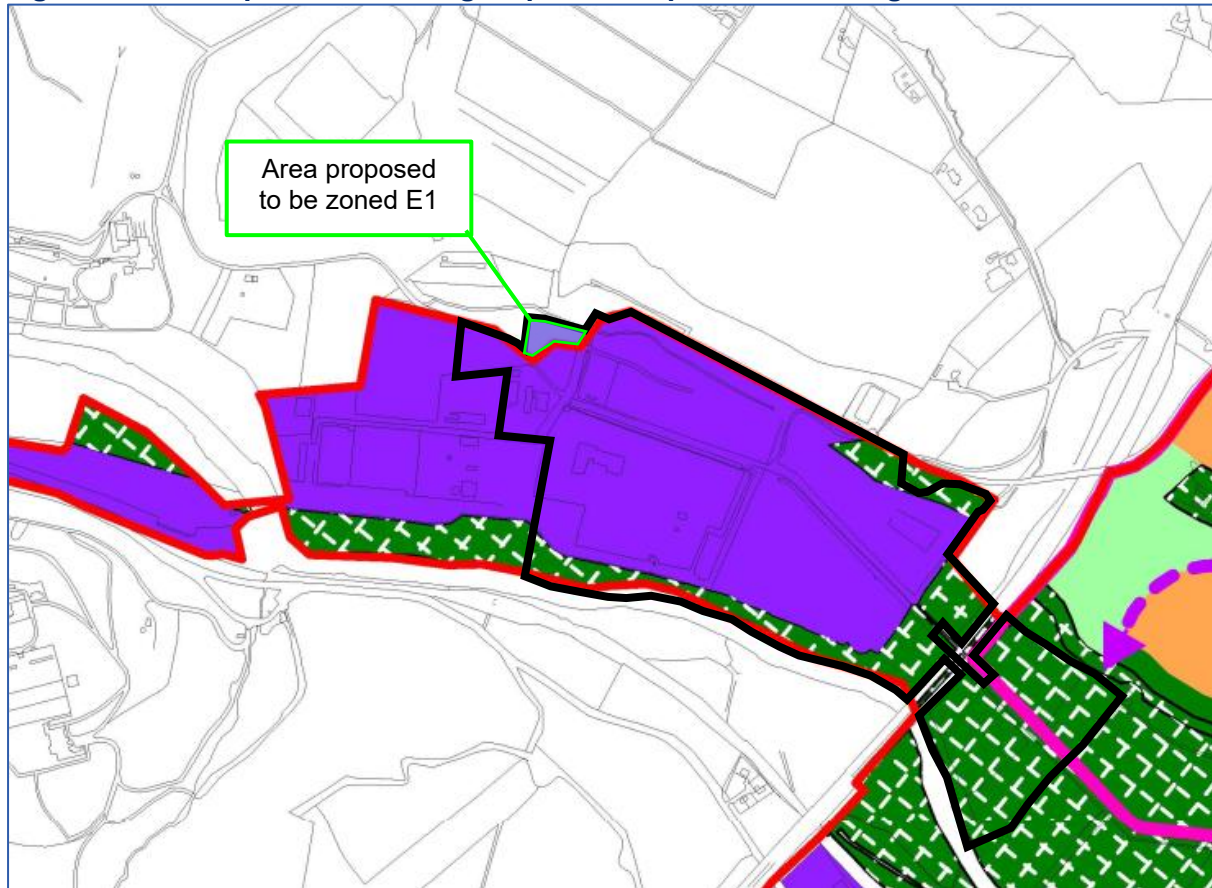
Figure 6-2: Aerial View showing condition of subject site this year



(Source: Google Earth, April 2025)

The rezoning of the north-western corner of the subject lands from currently being unzoned to E1 is proposed, and considered suitable, as it provides a land use zoning which is consistent with the land use zoning of the adjoining lands in the same ownership. This will support the delivery of land uses which meet the E1 objectives in this location.

Figure 6-3: Excerpt of LPF Zoning Map with Proposed E1 Zoning at NW Corner Shown



Additionally, as set out above, the inclusion of a special objective for the subject lands which continues to support the development of the lands for large-scale high technology employment development (including ICT Facilities and energy infrastructure) is considered necessary and appropriate because although there are several extant permissions on the site, a specific objective which recognises these permissions and continues to support large-scale development will ensure the objectives for the lands under the previous LAP will be facilitated and realised going forward, securing this important employment development in the Arklow area.

7.0 CONCLUSION

This submission has been prepared on behalf of Echelon Data Centres, in relation to lands at Avoca River Park, Arklow, in their ownership, part of which have been proposed to be rezoned under the Draft Arklow Local Planning Framework 2025.

This submission has outlined the relevant extant permissions on the subject lands, which were made in accordance with the Arklow and Environs Local Area Plan 2018-2024 (the LAP). Under the LAP the subject lands were zoned E1 Employment and were identified as part of the 'Employment Opportunity Site at Shelton'.

This submission proposes that the north-eastern portion of the subject lands proposed to be rezoned OS2, retains its E1 zoning in the Arklow Local Planning Framework, due to the extant permissions on this portion of the lands and its current cleared condition. It also proposed the north-western portion of the subject lands which is currently not subject to any zoning is rezoned E1 to align with the zoning of adjoining lands in the same ownership. Additionally, in light of the removal of the lands' Employment Opportunity Site designation it is proposed a special objective is included for the site in the LPF which continues to support the delivery of large-scale employment development on the site.

It is respectfully requested that Wicklow County Council consider this submission for the final Arklow Local Planning Framework and variation to the Wicklow County Development Plan 2022-2028.

Yours faithfully,



John Spain Associates