



Arklow LPF Variation No.5

Who are you:	Agent
Name:	Lowick Homes (Agent is McGill Planning making the submission)
Reference:	ARKLPF-120525
Submission Made	November 12, 2025 12:12 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.2 County Development Plan Strategy for Arklow
- A.3 Factors Influencing Future Development Options
- A.4 Overall Strategy

Local Planning Framework PART B Settlement Specific Objectives.

- B.3 Housing Development
- B.9 Zoning & Land Use
- B.10 Specific Local Objectives

Maps:

- Land Use Map

Maps:

Please see the letter enclosed with this submission. The purpose of this submission is to request that

- Developable Land: To retain all the developable land as set out in AAP3. The current SLO reduces the area of potential residential development by c.16%, in the Draft Local Planning Framework.
- Housing Targets: The housing targets set out in the Draft Local Planning Framework are revised upwards to reflect the National Framework Plan First Revision
- RN1 Zoning: All lands identified for residential development in SLO5 should be designated RN1.
- Phasing Constraint: The proposed phasing objective, B.9.2 is reworded so it is site specific or removed entirely.
- Masterplan: The existing masterplan, as adopted and agreed with WCC under Area Action Plan 3 of the Local Area Plan, remains the masterplan/ concept plan for the area.
- Additional Lands: To include all of our clients Kilbride lands in the local planning framework.

Upload a File (optional)

6191 - Kilbride Folio_SITE PLAN.pdf, 0.36MB

“Draft Arklow Local Planning Framework 2025”,
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96

12th November 2025

**Re: Draft Arklow Local Planning Framework 2025/ Proposed Variation No. 5
Wicklow County Development Plan 2022-2028**

Dear Sir/Madam,

We have been instructed by our clients: Lowick Homes, Building One, IDA Business Park, C/O Trinity Biotech, Southern Cross Road, Bray, Wicklow to prepare the following submission in respect of the Draft Arklow Local Planning Framework 2025.

1.0 PURPOSE OF SUBMISSION

The purpose of this submission is to request that

- **Developable Land:** To retain all the developable land as set out in AAP3. The current SLO reduces the area of potential residential development by c.16%, in the Draft Local Planning Framework.
- **Housing Targets:** The housing targets set out in the Draft Local Planning Framework are revised upwards to reflect the National Framework Plan First Revision
- **RN1 Zoning:** All lands identified for residential development in SLO5 should be designated RN1.
- **Phasing Constraint:** The proposed phasing objective, B.9.2 is reworded so it is site specific or removed entirely.
- **Masterplan:** The existing masterplan, as adopted and agreed with WCC under Area Action Plan 3 of the Local Area Plan, remains the masterplan/ concept plan for the area.
- **Additional Lands:** To include all of our clients Kilbride lands in the local planning framework.

2.0 OWNERSHIP

Our clients' lands comprise all of the Specific Local Objective 5 area, with the exception of the areas zoned for community and education along with an additional area to the north west of the site, adjacent to the N11.

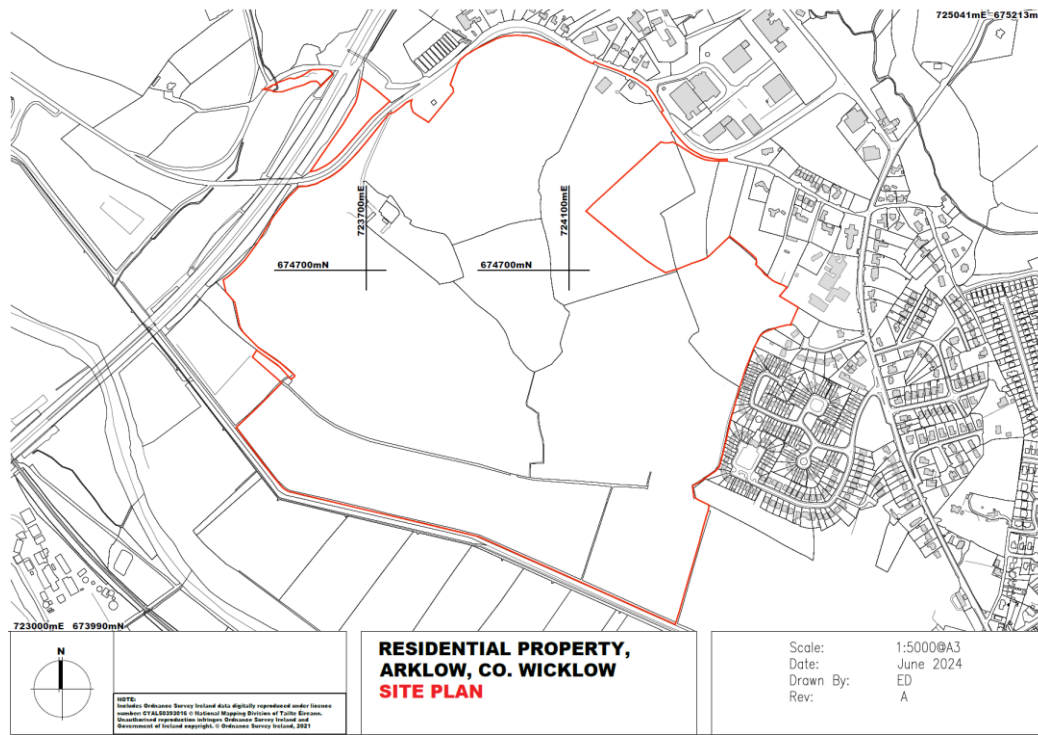


Figure 1 Land in the ownership of our Lowick Homes



Figure 2 Land in the ownership of Lowick Homes

There are a number of extant planning permission on the site.

Ref. 23/756: Permission is granted for 84 no. residential units along with a new road into the site, dedicated pedestrian and cyclist access via the Marshland's sports club lands and through Avondale Crescent to the Dublin Road. This is located in the southeast corner of SLO5 Lands. This permission also agreed the principle of the masterplan layout for the wider SLO5 Lands.

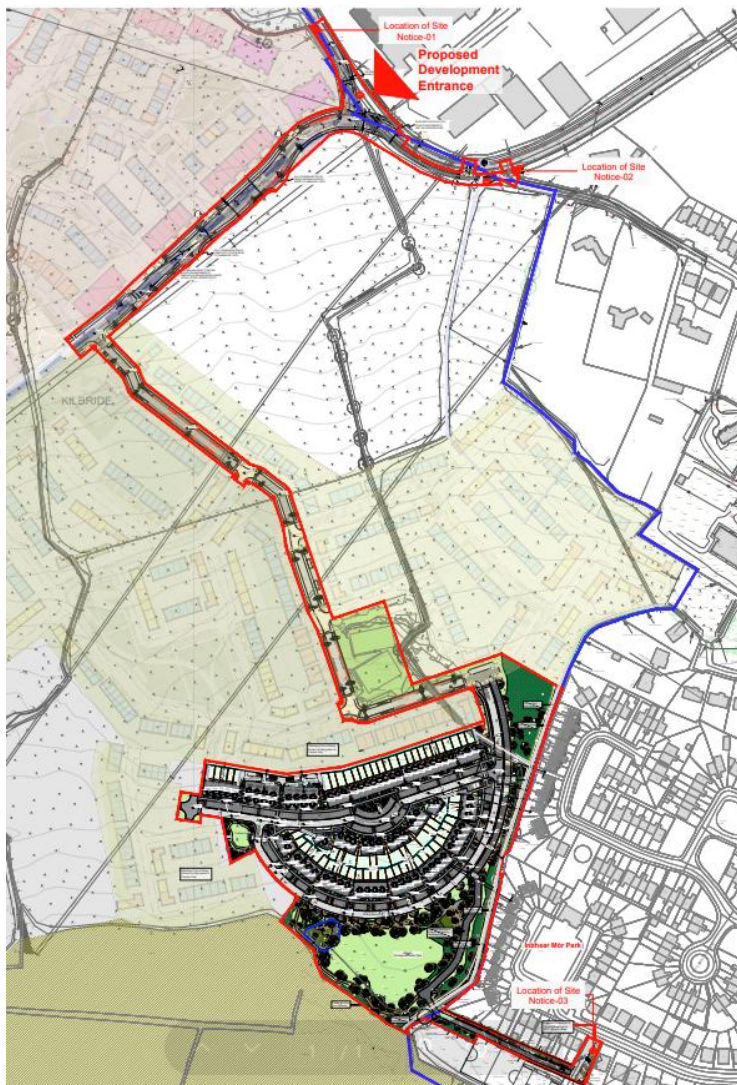
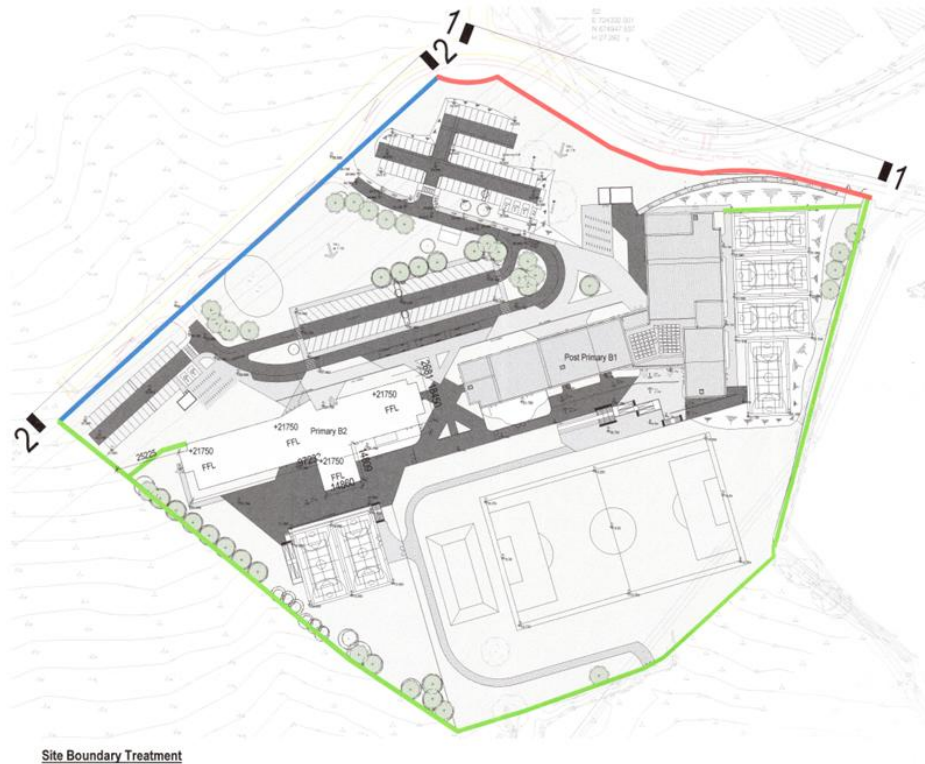


Figure 3 Site plan showing phase 1 consent and consented schools.

Ref. 22/213: Permission is granted for a new educational campus and link road. This includes the development of two schools, a 16 classroom primary school and a three storey post primary school along with associated parking, pitches, and play areas. This will provide for c. 480 pupils in the primary school and c. 400 pupils in the post primary school. We understand that work is due to commence on the delivery of this development in November 2025.



Site Boundary Treatment

Figure 4 Permitted school campus layout, this land is in the control of the Department of Education

Ref 2560387/ ACP Ref. 323367: There is also a planning application for a Largescale Residential Development currently at appeal with An Coimisiún Pleanála. It is due for determination on the 1st December.

If this is granted permission, it will deliver this first phase of the masterplan, referred to as Area Action Plan 3 Zoned lands in the current Local Area Plan for Arklow and Kilbride. This proposed development will provide 666 no. new homes, creche, local shops, new public open spaces and new vehicular and pedestrian access into and through the site.

3.0 EXISTING DESIGNATIONS APPLIED TO THE SUBJECT LANDS

The subject lands are designated Action Area Plan 3 (AAP3) – Kilbride Lands. The majority of the AAP3 lands are subject to a single zoning – “MU: Mixed Use” with the objective “To provide for mixed use development.”

Kilbride (AAP3) is identified as the location of major development in Arklow; the growth of the settlement in accordance with regional plan targets is contingent on the delivery of the major residential, employment and community services development at this location.

As a central site, close to the Bridgewater centre and the town centre it is welcomed and considered appropriate that this site remains as a zoned site to enable residential development and ensure that WCC meets its housing targets for both Arklow and the County as a whole.

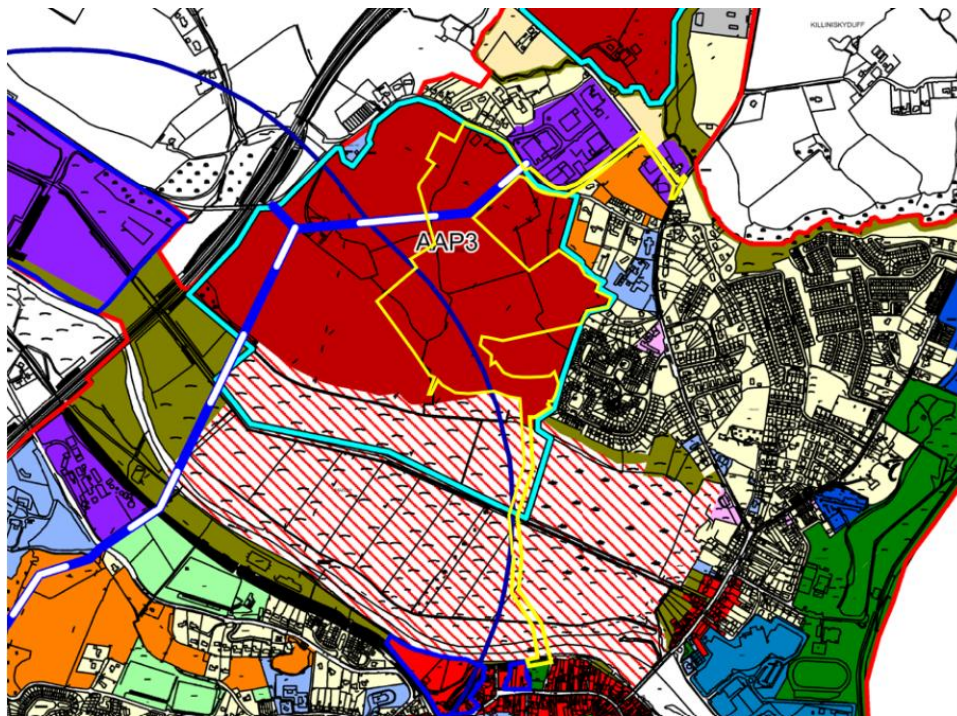


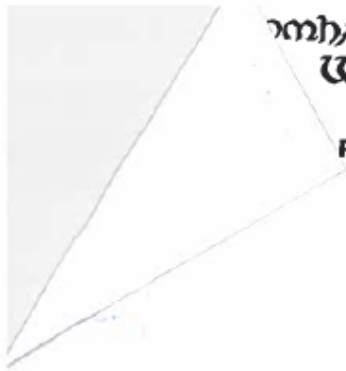
Figure 5 Current Local Area Plan for the site indicating its mixed use zoning for the AAP3 lands

The AAP3 lands at Kilbride are subject to an overall Masterplan for the lands prepared in 2019 by a team of architects including BKD Architects, Arthur Gibney & Partners, Taylor McCarney Architects, and Conroy Crowe Kelly Architects.



Figure 6 AAP3 Masterplan

In tandem with the Masterplan, an Action Area Plan for the overall landholding has been prepared and formally agreed with Wicklow County Council in 2019. See below confirmation of AAP3 approval.



Comhairle Contae Chill Mhantáin
Wicklow County Council
Forbairt Pleanála agus Comhshaol
Planning Development and Environment

Áras An Chontae / County Buildings
Cill Mhantáin / Wicklow
Guthán / Tel: (0404) 20148
Fais / Fax: (0404) 69462
Rphost / Email: plandev@wicklowcoco.ie
Sulomh / Website: www.wicklow.ie

McGill Planning,
Chartered Town Planners,
45 Herbert Lane,
Dublin 2.

2nd April 2019

Re: Action Area Plan for Action Area Plan No 3, Kilbride, Arklow,
Co. Wicklow

Dear Sir,

I refer to the Action Area Plan for Action Area 3, Kilbride, Arklow, Co. Wicklow and wish to inform you that the Action Plan has been approved by Wicklow County Council in accordance with the documents received from yourself on the 8th February 2019 subject to the recommended amendments. The agreed Action Plan is available for inspection at the Planning Counter at Wicklow County Council, County Buildings, Wicklow. I attach a copy herewith.

Planning applications may be submitted in relation to this area. Any application must take cognizance of this Action Plan and also all relevant development control standard policies within the County Development Plan 2016-2022 and the Arklow and Environs Local Area Plan 2018 as applicable.

Yours Sincerely,


Theresa O'Brien,
Senior Executive Officer
Planning, Development and Environment.



Both the Masterplan and AAP were prepared for the Kilbride Lands to facilitate a then planned Strategic Housing Development (SHD) planning application for the lands. The SHD application was subsequently put on hold pending the granting of permission for the Arklow Wastewater Treatment Plant upgrade, which was completed and is now operational since February 2025.

4.0 DEVELOPABLE LAND

Reduction of residential Developable Land when compared to the current LAP AAP3 mixed use zoning for the site.

SITE AREA COMPARISON	OLD LAP	NEW LPF (DRAFT)
MASTERPLAN OVERALL SITE AREA *Excludes school site & marsh	57.41 Ha	57.41 Ha
NET DEVELOPABLE AREA		
Zoned RN1 - priority 1	46.61 Ha	15.96 Ha
Zoned RN2 - priority 2	--- Ha	23.27 Ha
NET DEVELOPABLE AREA TOTAL	46.61 Ha	39.23 Ha

Figure 7 Site comparison table

As indicated by the table above, the LAP identified that there was c.46.61ha of land could be used for residential development. This has now been reduced by nearly c.16% to 39.23ha.

Of the c.39ha available for residential development only 41%, or c.15.96ha (c.558 houses), can be delivered in the immediate future. The remaining c.23ha can only be delivered once all RN1 lands in Arklow have been activated (proposed policy B.9.2).

The SLO 5 Detailed plan, make the following changes to the quantum of development, reflected in the table above thereby reducing the developable area and potential housing achieved from this site.

- The increase in the Active Open Space from 4.5ha to 6.25ha along with the additional open space zoning and additional green buffer adjoining the marsh will result in the reduction in the developable area from c.43.4ha to c.37.3ha (and to 36.9ha when the enlarged LSS is considered). This proposed re allocation of potential developable land, assuming a yield of 35uph, will result in only 1,312 units being achievable on this site, instead of 1,416 (1,500 when the consented lands are included) previously accommodated in the LAP. This is contrary to the objectives of the Development Plan and the NPF which is to ensure that zoned land achieves its maximum potential, in order to protect the rural lands elsewhere in Wicklow, while ensuring sufficient housing is provided to meet the grown needs of the population.
- The Local Shops and Service area has increased to 1.4ha from 1ha. This is a significant portion of the site to be set aside for the neighbourhood centre. It is so large there is a risk of significant vacancy in any units that are provided here. It would also further affect the vitality and viability of the Arklow Town Centre. As demonstrated by the recent Large scale Residential Development, a smaller area of c.1ha can provide a creche, retail/ café and a health/ community services area

all within 3 blocks, with apartments above. This is considered an appropriate scale of development to serve the entire site of c.1,500 units without competing with Arklow Town Centre or Bridgewater Shopping Centre. It is therefore requested that this remain at 1HA as set out in the AAP3 under the existing LAP.

3.5 Proposed local centre

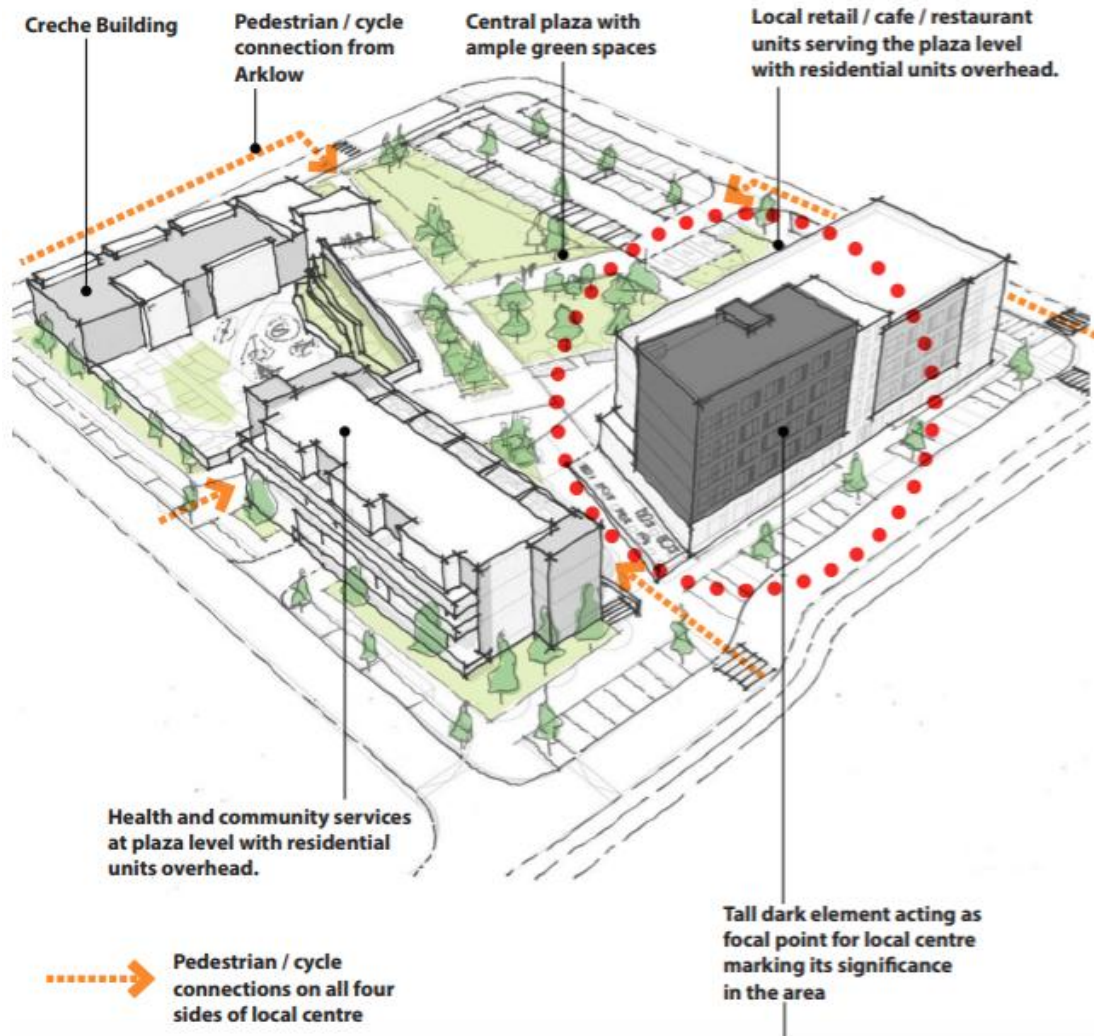


Figure 8 Extract from previous LRD Local Service Centre

- It is noted that the requirement that no more than 250 dwellings may be occupied in this SLO until the CE lands have been transferred to the relevant authorities or otherwise made available for the provision of the school campus. It is noted that this is already transferred and in the control of the relevant authorities and development is expected to commence this month, November 2025. It is therefore requested that this requirement is omitted from the LPF.
- The buffer “linear park” along the marsh edge, is acceptable in principle. However the width of this strip is excessive as it encroaches significantly into the developable area. It is suggested that for clarity the buffer strip is defined by the

text and not indicated on the zoning maps as it appears to vary in width and is inconsistent on the mapping.

This constraint is reflected visually below which indicates the very small area of the site that can come forward for homes in the short term.

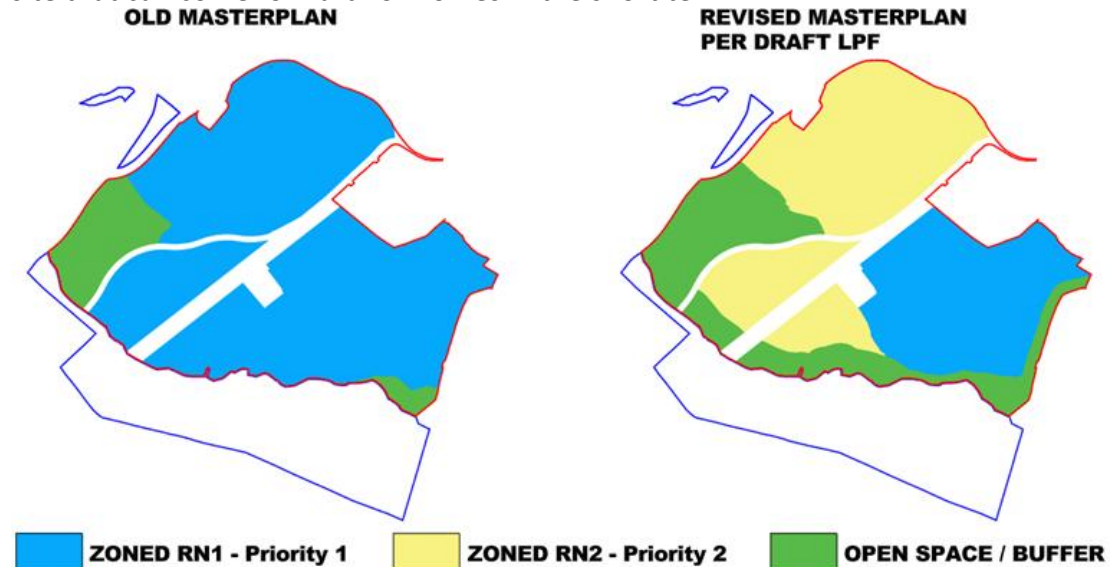


Figure 9 Comparison between the permitted Masterplan under AAP3 of the LAP and the proposed revised LDF

Conclusion

The reduced developable area, along with the restriction on RN1 zoned residential land will significantly impact on the number of homes delivered in Arklow. The unnecessary constraints will reduce the site area by c.16% thereby reducing the housing delivery. This is, as set out below, failing to meet the NPF First Revision Housing Target, the pent up housing demand in Arklow, and the identified housing crisis within Ireland. The zoning should revert to the zoning set out in AAP3, and the agreed masterplan. If this is not possible, the RN1 and RN2 zonings should be increased, and the areas identified for open space, LSS and buffer areas should revert to those agreed in the AAP3 Masterplan.

5.0 RN1 LAND ZONING

As set out above, it is our opinion that all of the land within this SLO5 should be zoned as RN1. This is to enable the developer, Lowick Homes, to progress with confidence in the delivery of this site, including the permitted phases. Given the significant level of investment required in road infrastructure, along with service infrastructure and community infrastructure, it is important that as many units as possible are available to be built.

The constraint associated with RN2 is that it relies on other third parties to “come to the table” and activate their RN1 zoned land prior to enabling this second phase to come forward. There is an agreed masterplan for these SLO5 lands with a detailed phasing plan which allows development to flow from one phase to the next. It will also enable the timely delivery of housing on this land which include significant benefits to the wider community – namely, safe access to the school campus through this site, as well as a population to support the new school. It will also provide significant quantum of public open space along with community facilities such as creche, retail units and community units. It is therefore a significant advantage to enable this land to come forward as set out in the phasing plan.

3.4 Subject Application phasing

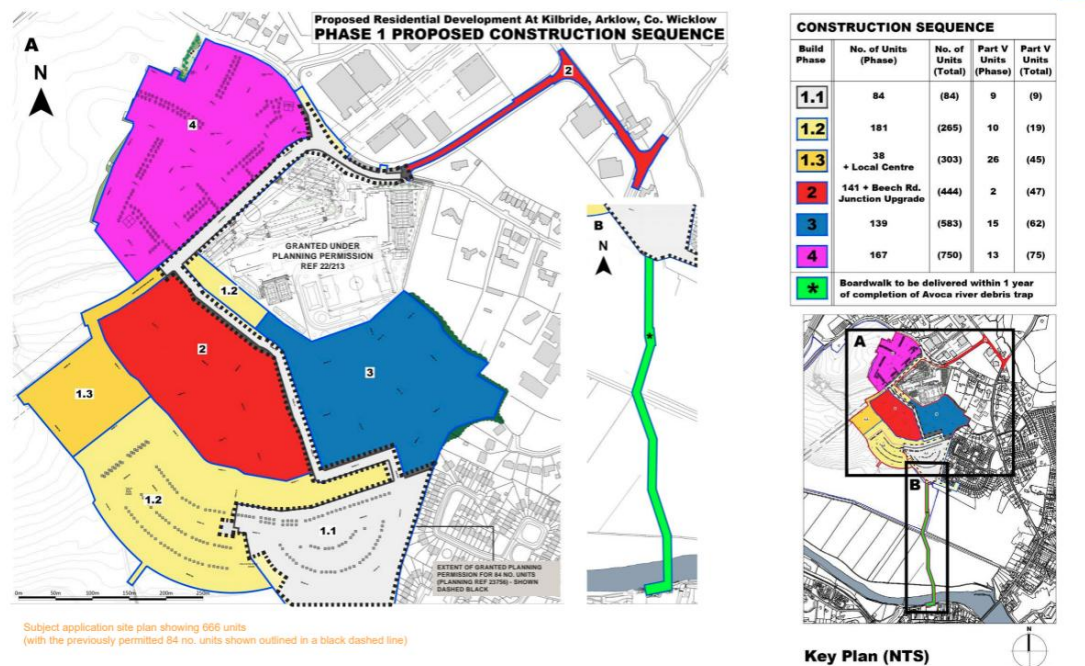


Figure 10 Extract from the LRD indicating the phasing plan

Furthermore, the proposed constraints requiring that 6ha of public open space and the LSS is delivered upon occupation of 50% of RN1 lands will result in an undeliverable, unviable constraint on this land. It is requested that it reverts to the agreed AAP3 phasing which allowed for the public open space and the LSS to be

delivered during the lifetime of the first 750 no. units with the remain 750 units delivering the Active Open Space at the same time.

Conclusion

The entire site should be zoned RN1 in order to meet the housing targets for Wicklow and to enable this site to be delivered in a comprehensive way. The constraint of waiting for all RN1 lands to be activated prior to RN2 sites being delivered is punitive to developers who are ready and willing to deliver entire sites and results in an unnecessary reliance on third parties/ lands outside of their control. This has been a historic problem in Arklow.

6.0 HOUSING TARGETS

We note that the population and housing targets for Arklow are based on those provided in the Core Strategy of the County Development Plan 2022-2028. However, these figures do not reflect the National Planning Framework First Revision, and will result in a continued under provision of housing for Arklow. These figures need to be increased, as does the quantum of land zoned RN1 in order to meet the housing need.

Under the current CDP the county is expected to deliver 1,411 units per annum. This increases to 2,068 per annum under the revised NPF. If you add in the 50% additional uplift that is also allowed for in the revised NPF this increases further to 3,102 per annum. Over 10 years (to 2034) that is 31,020 additional units in the County.

It is noted that the Chief Executive for Wicklow County Council has confirmed that Wicklow has been asked by Government officials to increase the housing supply targets by upwards of 44% compared to that in the CDP. Emer O Gorman, the CE, has also recommended that all RN2 proposed lands are moved into the RN1 lands zoning to enable this increased target to be met.

Based on the current CDP settlement strategy Arklow has targets for 9% of the County's population/housing growth. Applying that ratio to the new figures means Arklow is to deliver between 186-279 residential units per year reaching a total of 1,860-2,792 units over the next 10 years. This compares to a total of 956 indicated for Arklow in the current CDP between 2022 and 2031 (106 per annum).

This increase in housing targets does not account for pent-up demand in Arklow due to the consistent under provision of housing in the area. The population of Arklow in the 2022 Census was recorded at 13,399 which was an increase of only 1.8% from the 2016 Census (13,126), which is well below the State average of 8.1%. By comparison Wicklow/Rathnew grew by 18% and Greystones/Delgany grew by 21% over the same period. As a result of the stagnation in growth for Arklow over this period, and with the significant investment in infrastructure, Arklow, as a key growth town is ideally positioned to accommodate increased housing supply. Our client is keen to assist with this growth through the activation of the entire AA3 land holding.

Housing Delivery in Arklow 2022 to Date

McGill Planning undertook a review of housing commencements in Arklow since the adoption of the County Development Plan.

The National Building Control and Market Surveillance Office's BCMS (Building Control Management System) records that in the 3 years between Q3 2022 and the present (November 2025) only 54 residential units have been commenced in the town.

Between July 2022 and February 2024 only 19 houses were commenced.

Furthermore, the relative increase in commencements (for a total of only 34 units) in March and April last year was clearly as a result of the closing date of April 24, 2024 for availing of temporary local authority development contributions scheme.

Despite that scheme being further extended since to include for developments commenced before the end of 2024, no additional commencements occurred in Arklow.

COMMENCEMENTS Q2 2022 to Present				
Address	Number of Units	Commencement Notice No.	Commencement date	WCC Planning Ref.
Meadowvale	2	SN0000247WW	23-Apr-24	22/366
Emyvale	6	CN0113319WW	03-Apr-24	23/447
Meadowvale	24	CN0112246WW	02-Apr-24	22/366
39A Wexford Road	2	SN0009861WW	11-Mar-24	17/517
Heatherside	3	CN0106036WW	02-Oct-23	21/1218
Heatherside	16	SN0007567WW	08-Aug-22	20/235
Ballinaboabogue	1	<u>CN0128243WW</u>	8 th May 2025	24/316
	53			

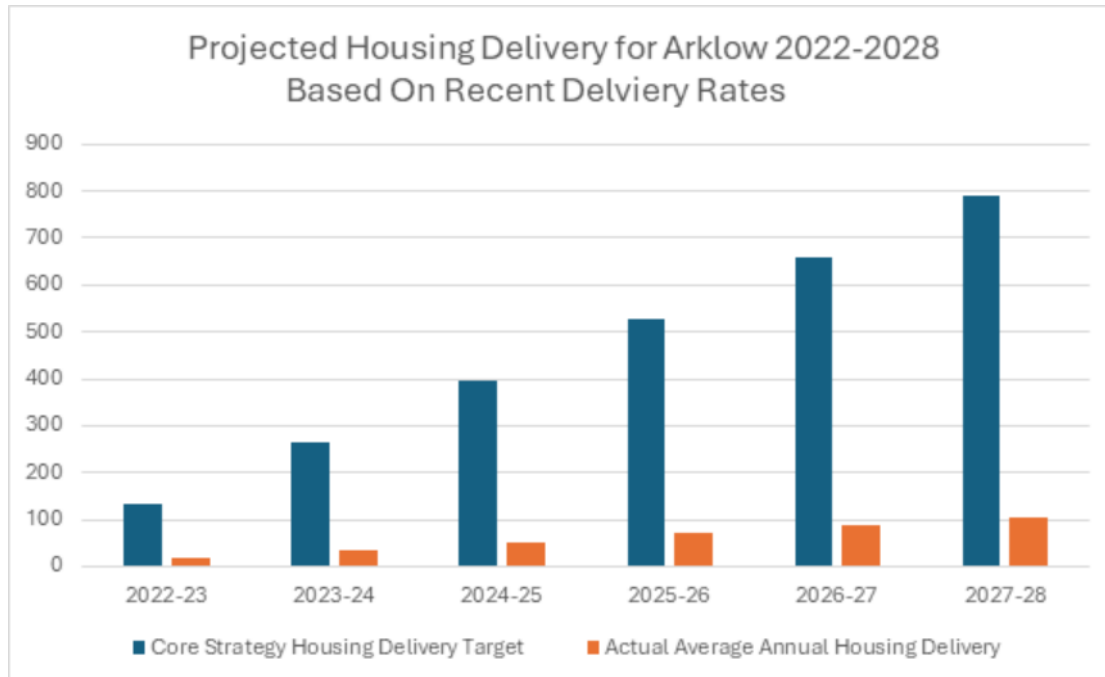
Table 1 Arklow Residential Commencements During Life of County Development Plan To Date

53 units equates to an average delivery of only 18 units per annum / 4.5 units per quarter over the past 3 years. This rate is less than 14% of the 132 units per annum required to reach the 790 unit target by Q2 2028.

Assuming all of these commenced units will be completed during the life of the Plan then as it stands there are an additional 737 units to be provided in the town before the end of Q2 2028.

However, if the current rate of delivery was to continue for the next 3 years then the housing delivery for Arklow would fall short of the Development Plan target by 86% (684 units).

Therefore, it is imperative that all lands identified as part of SLO5 are zoned RN1 in order to mitigate against this potential shortfall when considered against both the adopted LAP, the Draft LPF, and the potential uplift of housing numbers that will be required to meet the NPF First Revision housing targets.



Projected Housing Delivery Rates for Arklow Based on Delivery Rates Q3 2022 to Present.

Non-Activation of New Residential Planning Permissions

There are a number of permissions granted since the adoption of the Development Plan in 2022 for new residential development in Arklow but which have not been activated or commenced.

The table below lists extant planning permissions, totalling 728 units. As can be seen the vast majority of units (65%) are within a single planning permission, comprising an LRD for 476 units at Tinahask.

Address	Res Units	Planning Ref	Grant Date	Permission Expires	Existing Built Up Area?
Yellow Lane	32	20/1210	30/05/2023	29/05/2028	Y
Arklow Shipping Premises	34	23/ 381	04/11/2024	03/11/2029	Y
Upper Main Street	99	24/84	04/12/2024	03/12/2029	Y
Knockenrahan Upper	3	24/285	07/01/2025	06/01/2030	Y
Kilbride	84	23/756	05/02/2025	04/02/2030	N
Tinahask Upper	476	24/325	21/01/2025	20/01/2032	N
Total	728				
Total Excl AAP Lands	168				

Table 2 Extant Permissions Granted in Arklow During Life of County Development Plan
84 of the units are also located in Phase 1 of this Kilbride development as noted above. It is understood that this permission will commence presently.

However, in relation to the other permissions, of which over 170 were granted in 2023/24 there is no indication of when or indeed if any will commence and start delivering units.

A further consideration is that only 3 permissions, totalling 36 units, have permission lives that tally within the life of the Development Plan (Q2 2028). Most of the extant units are subject to permissions that extend up to 4 years beyond the life of the current Development Plan.

The LRD permission at Tinahask is for 7 years until January 2032, by which time the next County Development Plan and Draft Local Planning Framework will be into its 4th year.

It is also likely that a proportion of these permissions may be significantly delayed from commencement/completion to beyond the life of the current Development Plan/ LPF or indeed may not commence at all and expire.

The % of Commencements per Units Granted during the first 3 years of the Development Plan is extremely low at only 7%.

Even when omitting the two 2025 granted permissions on the AAP lands at Kilbride and Tinahask, the percentage is still very low at 30% (53 commenced units vs 174 permitted units).

That such low commencement rates occurred during a period when the development levies rebate scheme was in play to unlock permissions makes the results for Arklow even more surprising.

By contrast, the percentage of completions per units granted for the State for each of the years 2022-2024 was extremely high at 87% and over.

Year	Units Granted	Dwelling Completions per Year	% Completions per Units Granted
2022	34,177	29,726	86.98%
2023	41,225	32,695	79.31%
2024	32,401	30,330	93.61%

Table 3 Ratio of Residential Units Grant to Units Completed Nationally 2022-2024

Naturally the restrictions on the development of Arklow town pending the delivery of the new Wastewater Treatment Plant was a significant inhibitor in planning and delivery during the initial years of the County Development Plan.

However, despite the new WWTP being fully operational none of the permissions listed above have commenced, nor has there been, LRD aside, any significant increase in permissions for large residential developments.

Conclusions

The above assessment demonstrates that there is ample justification to increase the housing targets for Arklow to account for both pent up demand/ lack of delivery of housing to date as well as reflecting the revised NPF.

We estimate that Arklow is to deliver in line with the revised NPF between 186-279 residential units per year reaching a total of 1,860-2792 units over the next 10 years. This is over double the total of 956 indicated for Arklow in the current CDP between 2022 and 2031 (106 per annum). This higher target will accommodate both the pent up demand within the area and the acknowledged housing shortage in Ireland.

To accommodate this increased housing target, it is proposed that all of the SLO5 lands should be zoned RN1, removing the RN2 zoning from these lands. This will enable the targets to be achieved for Arklow as a whole.

As set out above, this site is ideally positioned to deliver housing, with a housing developer who is ready to commence on site and will complement the permitted school campus as well as the upgrades within the surrounding area.

7.0 PHASING CONSTRAINT

A significant constraint in the current Local Area Plan is the requirement to use a sequential approach to the delivery of land within Arklow. This approach has constrained the delivery of this site in Kilbride, designated as AAP3 lands. It has precluded its delivery until lands at AAP1 and AAP2 have been delivered. However, due to the site constraints of these respective sites, they have not been delivered.

While the AAP2 Lands in Tinahisk, South Arklow have been granted permission, development has not commenced on site. It is also noted that there are considerable constraints to be overcome in terms of compliance with conditions which provides a degree of uncertainty on whether these lands will be delivered in accordance with this permission.

While the removal of the sequential phasing requirement in terms of prioritising certain SLO lands over others is welcomed, concern remains regarding the wording of B:9.2 which will continue to constrain the delivery of RN2 lands.

It is understood that SLO lands 1-5 can be delivered in any order and do not have to be delivered sequentially. However, the rezoning of a portion of land within SLO5 to RN2, and the wording under B:9.2 remains a significant constraint in terms of delivering housing in a timely, coherent, and cost effective manner, as it is reliant on all the RN1 sites, across Arklow to have planning permission and become activated. As can be seen historically in Arklow with AP1 sites in the current LAP, some sites are not being brought forward in a timely manner. This proposed wording will therefore constrain development on sites that can be delivered.

B:9.2 Phasing

The lands that are needed to be zoned to meet the current target will be zoned 'New Residential' and identified in this LPF as 'RN1 - New Residential Priority 1' lands.

In order to ensure a long term supply of zoned residential land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF, this LPF also provides for additional zoned residential lands, over and above that needed to meet current targets, zoned 'RN2 – New Residential Priority 2'.

Permission will only be considered during the lifetime of this LPF for RN2 lands where the following conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);***
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.***

It is an objective of the Council that development is undertaken in an orderly and sustainable manner. The development of zoned land should generally be phased in accordance with the sequential approach:

- ♣ Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. 'leapfrogging' to peripheral areas should be avoided;***
- ♣ A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and***
- ♣ Areas to be developed should be contiguous to existing developed areas.***

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.

The Council may, in certain cases, phase permitted development where this is considered necessary for the following:

- a) the promotion of an appropriate balance of employment, residential and service facilities (schools, shopping, community facilities etc.) and other uses that are required to increase the self-sufficiency of the settlement, or***
- b) ensuring the delivery of infrastructural services in tandem with development, including water, sewerage and road infrastructure, that is required to safeguard the environmental quality and public safety of the area.***

As set out above, it is our opinion that insufficient lands have been zoned under RN1, and we believe that the entirety of SLO5 Lands should be zoned as RN1.

However, if this is not deemed appropriate, we would request that this phasing objective/ policy is amended. The constraint that RN2 lands can only be delivered where 75% of Priority 1 new residential lands (NR1) have been activated (i.e. consent obtained and development initiated) and that it can be shown that the housing/population targets generated by the proposed developments would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.

This policy, similar to the existing sequential policy in the LAP, continues to rely on other landowners wanting to get planning permission and deliver their sites in a timely manner. As can be seen historically in Arklow, the AAP3 Lands, owner by our client, have not been delivered, despite best endeavours, due to AAP1 and AAP2 lands not being brought forward.

It is suggested that this phasing policy is reworded as follows:

Permission will only be considered during the lifetime of this LPF for RN2 lands where the following conditions are satisfied:

- 75% of Priority 1 new residential lands (RN1) lands **within the designated SLO Lands (SLO1, SLO2, SLO3, SLO4 and SLO5)** have been activated (i.e. consent obtained and development initiated);*
- It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.*

Conclusion

This amendment would enable developers, such as Lowick Homes, who are motivated, active and proven to deliver sites, bring forward the entirety of the Kilbride SLO5 land holding. Once the RN1 Lands on the SLO5 lands have been activated they can then progress a second planning application to deliver the RN2 lands in a timely manner. The development of the RN2 lands within a wider development/ masterplan area should not be constrained by other sites which are not being brought forward elsewhere in Arklow. Alternatively, the removal of the RN2 zoning also achieves this.

8.0 PERMITTED MASTERPLAN AND CONFLICTS WITH PROPOSED SLO 5

The retention of overall mixed use zoning, including housing, commercial, open space and education for SLO5 lands is welcomed, but a number of clarifications sought are outlined below:

- The masterplan which was agreed for AAP3 and which has formed the basis for two recent grants of permission (23/756 for 84 no. residential units, and 22/213 for the school campus) has been altered in the Draft LPF, which will require the design team to go back to the drawing board as the implications of the cumulative changes are significant.
- The reduction in the amount of area available for residential development
- The inclusion of RN2 lands and phasing constraints

Masterplan

It is considered that the agreed masterplan, which has formed the foundation to AAP3, and is the backbone to the two granted permissions has been set aside. This masterplan has been developed over a period of 8 years and has been considered in detail, taking into account all of the constraints of the site.

The replacement of this masterplan with a new Concept Plan, which does not have the benefit of the site investigations, detailed assessments and consideration of levels, is inappropriate. The proposed tweaks will result in a reduction in the quantum of developable land, impacting the number of homes achievable on this site, the viability of the commercial centre, and potentially the Main Street in Arklow, and the fundamental principles of the site.

The increase in the neighbourhood centre from 1ha to 1.4ha will result in the need for larger units, and more retail units. There is currently a chronic vacancy problem both in Bridgewater Centre and along the Main Street. It is unrealistic that a neighbourhood centre, of this increased size, will have full occupation, and will in all likelihood result in further vacancy problems within Arklow. It is better to maintain this area to 1ha, and achieve full occupancy, creating an attractive streetscene rather than having dead, unoccupied or underoccupied shops, resulting in an eyesore within the development.

The rationale for a reduction from 200 units within each distinct housing estate to 150 units is not clear, particularly when different architects have thus far contributed to the masterplan on the basis of the 200 unit per character area basis. The basis for this change is not provided, and will not result in a better overall development, but instead gets to the aforementioned point that this Draft LPF proposes a further deviation from the approved masterplan without an associated improvement. The agreed masterplan layout, site shape & topography, and approved 84 unit scheme, do not lend themselves to site subdivision per a reduced character area size of 150 units. It is also noted that the 150 limit was imposed against the 1,500 no. unit development, it would

result in c. 10 no. character areas which is excessive. It is therefore requested that this remain at 200 units as set out in the AAP3 under the existing LAP.

The agreed masterplan takes into account the orientation, levels, site investigations and constraints of the SLO area and provides a coherent, considered approach to enable the development of this site. The Masterplan, as agreed, and as set out above, has been designed by separate architects practices to create legibility to the area, while providing a visually attractive development. It is therefore requested that the masterplan for this site is carried forward into the LPF.



Figure 11 Masterplan approved by WCC

Conclusion

Reverting to the AAP3 Masterplan would enable this site to be delivered quickly, without the requirement to revert to new layouts and design which would take time. This site, as demonstrated by the LRD application, is ready to be delivered and can be in a short period of time.

The masterplan, as agreed, also provide appropriate levels of LSS, open space and community facilities proportionate to the quantum of proposed housing. Additional open space and neighbourhood services would be at the expense of much needed housing and run the risk of being under used or vacant.

9.0 ADDITIONAL LANDS: Inclusion of all Lowick Homes lands

We would ask that WCC include all lands owned by Lowick Homes within the town boundary and to include the 0.72 hectare land plot highlighted below rather than leave it vacant. This parcel of land can accommodate an additional 10-15 housing units.

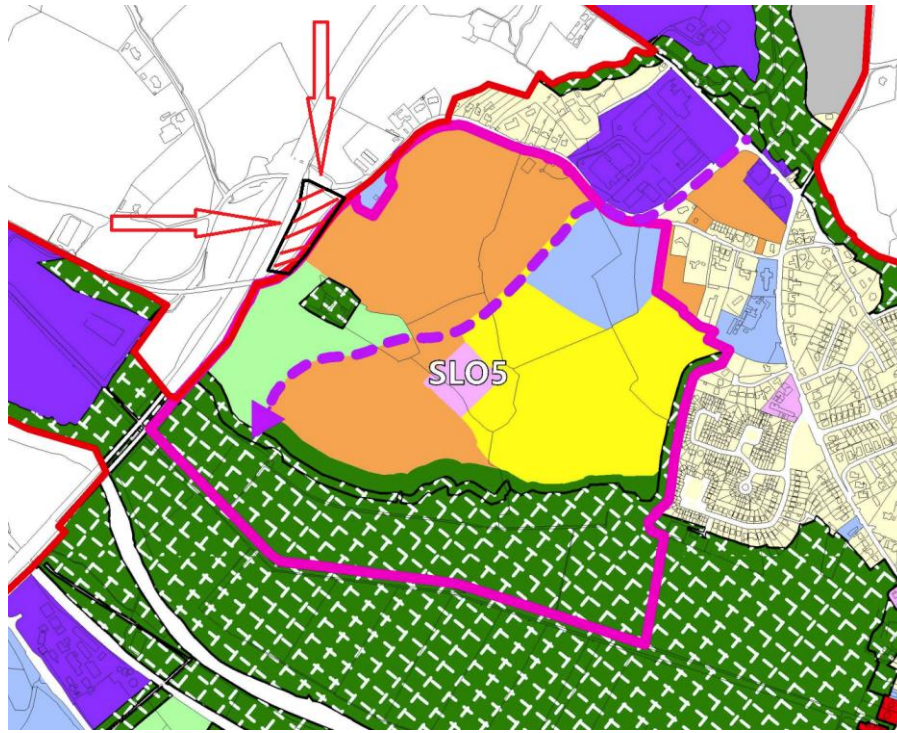


Figure 12 Additional area to be zoned RN1

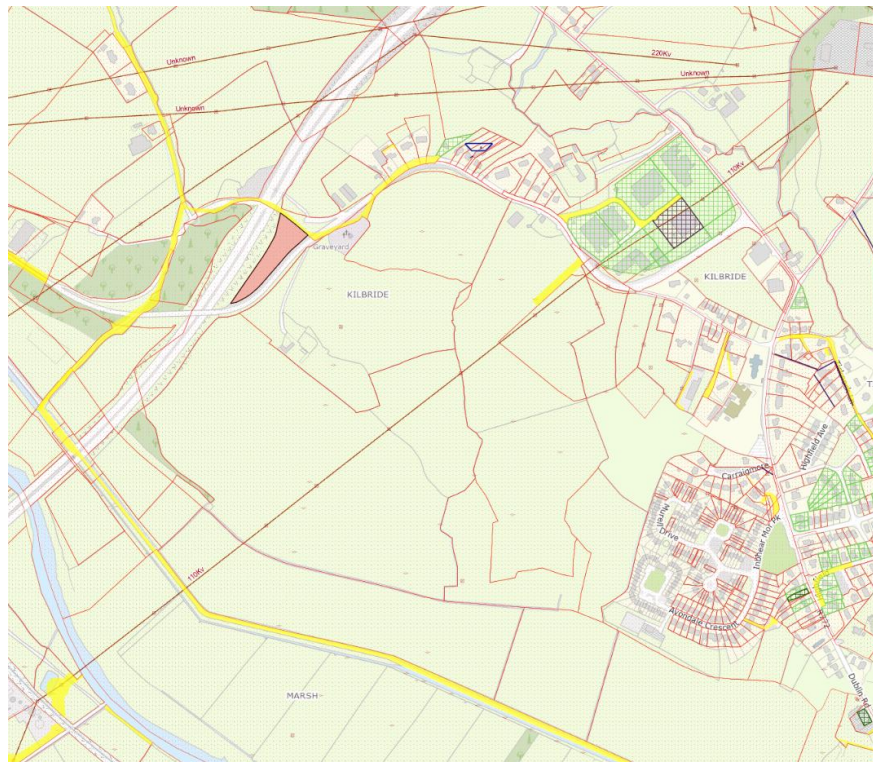


Figure 13 Additional area to be zoned RN1

Conclusion

The inclusion of this small additional area of land would not only enable the comprehensive development of the site but would also provide for additional residential development in this area.

10.0 CONCLUSION

The Draft LPR is welcomed, and there are significant benefits within the overall objectives set out within this development.

It is considered that the proposed quantum of housing proposed is significantly below that required to meet both the pent up demand in the area and is not aligned with the NPF First Revision.

The constraints regarding phasing are also of concern and will result in sites being held up unnecessarily by landowners/ developers who due to site constraints/ other matters do not want to deliver their RN1 zoned land. This will constrain the delivery of RN2 lands.

With regard to SLO5, Kilbride lands, it is considered that the entire site should be zoned RN1 to enable Lowick Homes, who are an active developer within Wicklow, to deliver this site in a coherent, and quick manner.

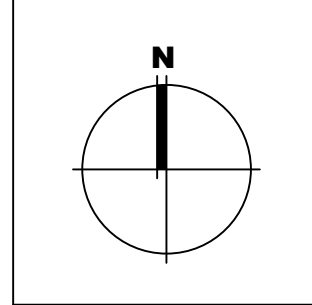
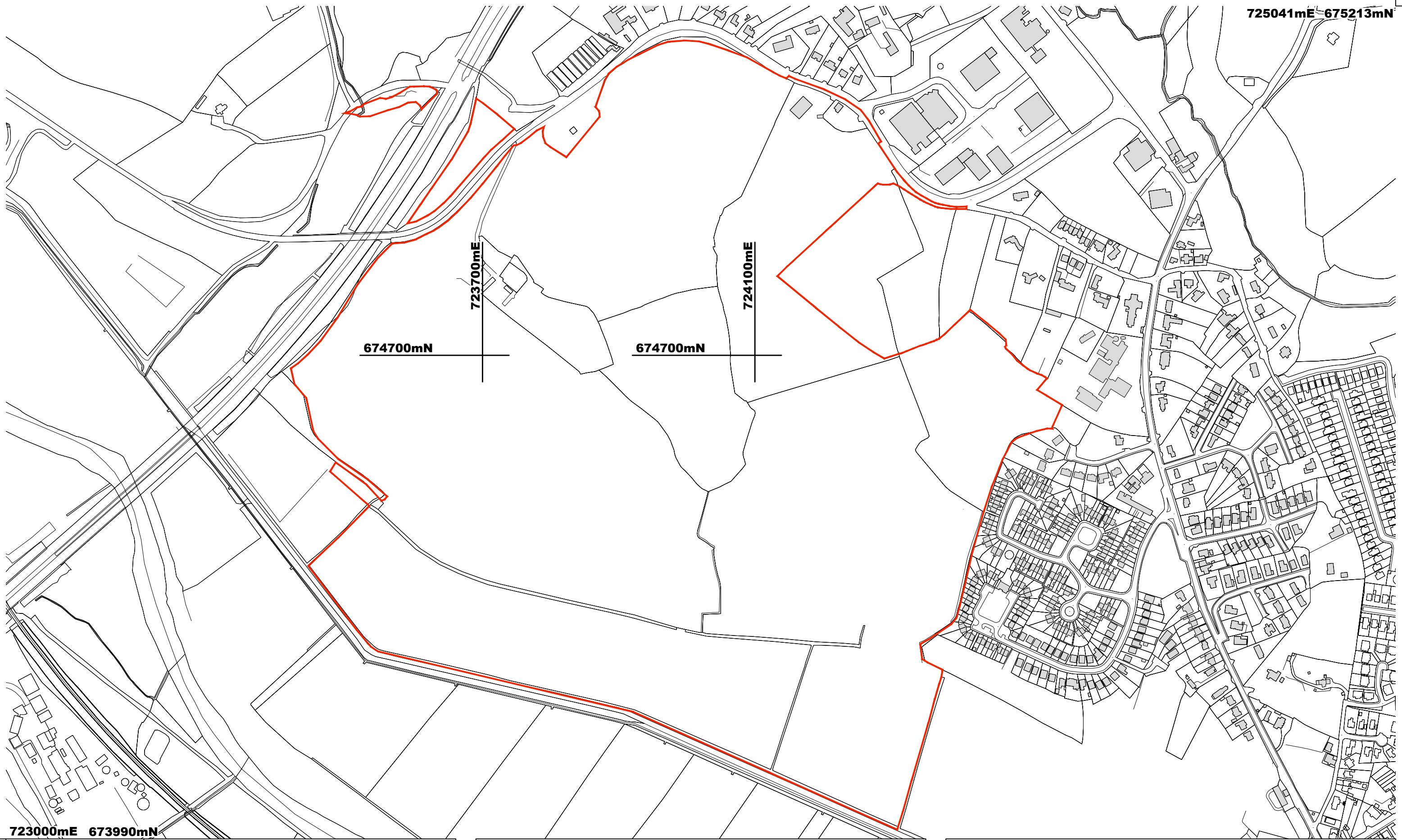
The deviation from the agreed masterplan from this site is of concern, as is the reduction of the development land. This is already a severely constrained site with significant issues relating to the marsh, levels, and power cables. The further reduction in potential developable area through the increase of local shopping area and open space will result in a reduced yield from the site in terms of homes. It is suggested that the agreed masterplan, which was developed based on site investigations and a detailed understanding of the constraints of the site, is carried forward into the LPR as set out in the LAP which was approved in conjunction with Wicklow County Council.

Given the above, Wicklow County Council are therefore requested to include the AAP3 Lands as agreed in the LAP, and also to include the entirety of the SLO5 lands within the RN1 housing objective.

Yours



Trevor Sadler
Managing Director



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SITE PLAN

Scale:	1:5000@A3
Date:	June 2024
Drawn By:	ED
Rev:	A