



Comhairle Contae Chill Mhantáin Wicklow County Council



Proposed Variation No. 5 to the Wicklow County Development Plan 2022 – 2028

(including the Arklow Local Planning Framework)

Report to the members of Wicklow County Council under Section 13(4) of the Planning and Development Act 2000 (as amended)



25 February 2026

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This report should be read alongside the **Proposed Variation / Draft Arklow Local Planning Framework** which is available to view [here](#) and the Wicklow County Development Plan 2022 – 2028 which is available to view [here](#).

The **written submissions** on the Proposed Variation / LPF are held on file and are available for inspection on Wicklow County Council's website [here](#).

Part 1 Introduction

1.1 Proposed Variation No. 5 to the Wicklow County Development Plan 2022-2028

In accordance with Section 13(2) of the Planning and Development Act 2000 (as amended), Wicklow County Council is proposing to vary the County Development Plan 2022-2028.

Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of variations by planning authorities was commenced on 31 December 2025. However, section 69(2) provides that a variation of a development plan under Section 13 of the Act of 2000 shall continue under that Act after the repeal of Section 13 of the Act of 2000.

Reason for the Proposed Variation:

To integrate the final Arklow Local Planning Framework into the Wicklow County Development Plan 2022-2028 and to ensure consistency of the draft and final Arklow Local Planning Framework with the County Development Plan 2022-2028, it is proposed to vary the County Development Plan.

1.2 Proposed Variation / Local Planning Framework (LPF) Consultation Process

The Proposed Variation / draft Local Planning Framework was placed on display during the period of 01 October 2025 to 12 November 2025 (6 weeks). The aim of the consultation process was to enable the public and interested parties to give their observations on the Proposed Variation / draft Local Planning Framework. A public open day was also held in Arklow Municipal District Office, Castlepark on Thursday 23 October 2025.

A total of 67 No. submissions were made with respect to the Proposed Variation / draft Local Planning Framework. The written submissions on the Proposed Variation / draft LPF are held on file and are available for inspection on Wicklow County Council's website [here](#).

1.3 Planning legislation

Planning and Development Act 2024

The Planning and Development Act 2000 (as amended) has been reviewed with a new Planning and Development Act passed by the Oireachtas in October 2024; the new Act is in the process of being commenced in stages. Chapter 5 of Part 3 of the Planning and Development Act 2024, which relates to the preparation of variations by planning authorities was commenced on 31 December 2025. However, section 69(2) provides that the variation of a development plan under Section 13 of the Act of 2000 shall continue under that Act after the repeal of Section 13 of the Act of 2000.

Planning and Development Act 2000 (as amended)

The provisions of the Planning and Development Act 2000 (as amended) with respect to Variations to County Development Plans are the relevant legislation at this time for this Proposed Variation / draft Local Planning Framework making process.

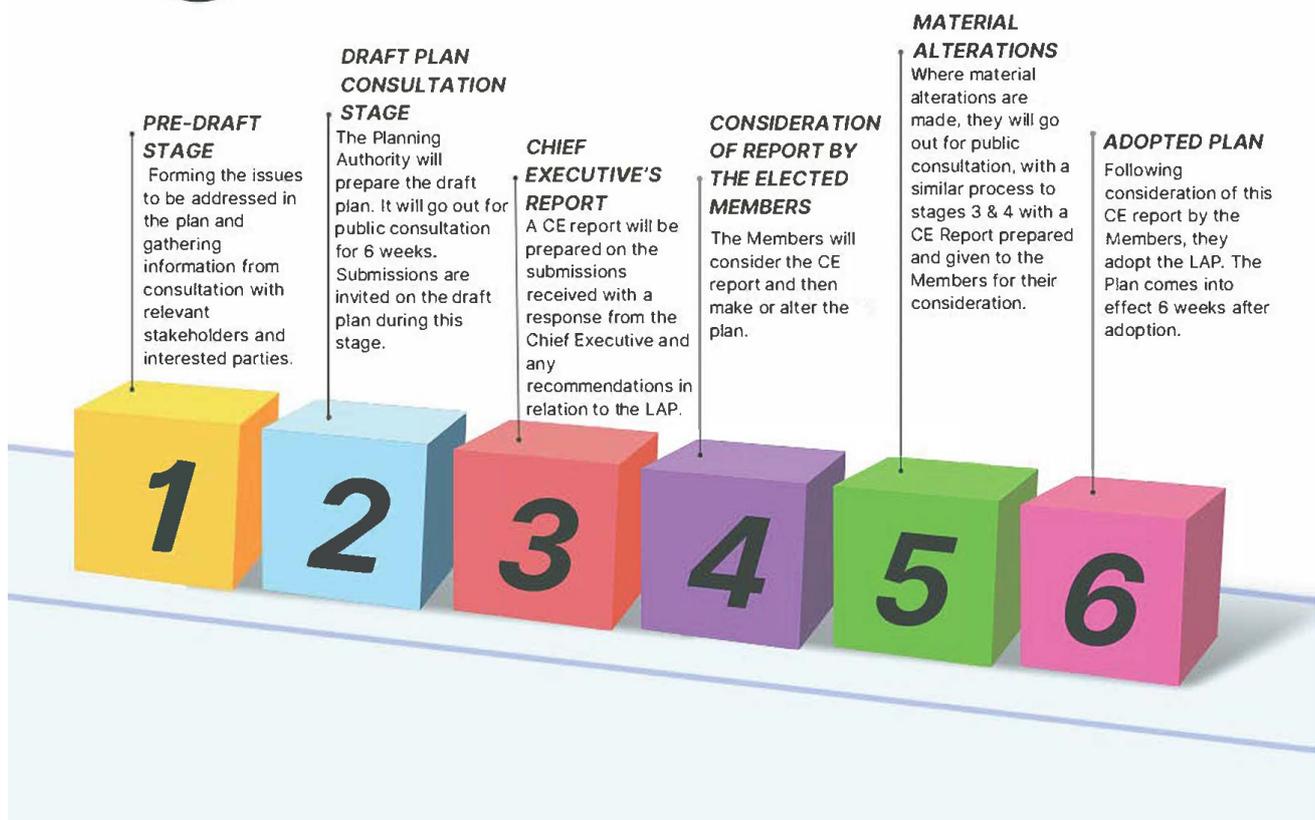
There are no provisions for Local Area Plans under the new Planning Act; hence it was decided to make and adopt a local plan / framework for Arklow via the making of a variation to the Wicklow County Development Plan. Under the Planning and Development Act 2000 (as amended), the Variation process (Section 13) provides for shorter timeframes compared to the timeframes set out for the making of Local Area Plans (Section 20) particularly with respect to public consultation periods. In order to ensure the public and elected members get

sufficient time to consider the Proposed Variation / draft Local Planning Framework and any possible material alterations thereto, additional time is being allowed for at each stage over and above that set out for variation in the 2000 Act¹.

Section 13(4)(a) of the Planning and Development Act 2000 (as amended) states that, not later than 8 weeks after giving notice of a proposed variation to the development plan under subsection (2)(b), the Chief Executive (CE) of a planning authority shall prepare a report on any submissions or observations received under that subsection and shall submit the report to the members of the authority for their consideration.

This Chief Executive's Report has been prepared for consideration by the members of Wicklow County Council to fulfil this requirement under Section 13(4)(a).

6 KEY STAGES IN THE PLAN MAKING PROCESS



The required content of this Chief Executive's Report is set out under Section 13(4) of the Planning and Development Act 2000 (as amended). A report under Section 13(4)(a) shall:

- (i) list the persons or bodies who made submissions or observations,
- (ii) provide a summary of -
 - I. the recommendations, submissions and observations made by the Minister, where the notice under *paragraph (a) of subsection (2)* was sent before the establishment of the Office of the Planning Regulator,

¹ Section 13 (10) of the Planning and Development Act 2000 (as amended) states, 'A person shall not question the validity of a variation in a development plan by reason only that the procedures as set out in this section were not completed within the time required.'

- II. the recommendations, submissions and observations made by the Office of the Planning Regulator, and
- III. the submissions and observations made by any other persons,
in relation to the Proposed Variation / Draft LPF.

(iii) give the response of the CE to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government.

As Wicklow County Council is within the Greater Dublin Area, the CE Report shall summarise the issues raised and the recommendations made by the NTA in its written submission and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Proposed Variation / Draft Local Planning Framework.

Furthermore, the Report shall summarise the issues raised and recommendations made by the relevant regional assembly in its written submission and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the Proposed Variation / Draft Local Planning Framework

The members of the planning authority are required to consider the Proposed Variation No. 5 / Draft Local Planning Framework and this report of the Chief Executive.

It should be noted that some submissions in full or in part raise issues that do not relate to any aspect of the Proposed Variation / Draft Local Planning Framework and such submissions / issues will not be considered in this report or at this stage in the plan making process.

1.4 Next Steps

The members of a planning authority shall consider the Proposed Variation / Draft Local Planning Framework and the report of the CE.

Following consideration of the Proposed Variation / Draft Local Planning Framework and the report of the CE, where a planning authority, after considering a submission of, or observation or recommendation from the **Office of the Planning Regulator**, made to the authority or from a **regional assembly** made to the authority, decides not to comply with any recommendation made in the Proposed Variation / Draft Local Planning Framework and CE's report, it shall so inform the Office of the Planning Regulator or regional assembly, as the case may be, as soon as practicable by notice in writing which notice shall contain reasons for the decision.

The members of the authority, having considered the Proposed Variation / Draft Local Planning Framework and CE's report may, as they consider appropriate, by resolution, make the Variation / Local Planning Framework which would, if made, be a material alteration, with or without further modification or they may refuse to make it.

The planning authority shall determine if a strategic environmental assessment or an appropriate assessment or both such assessments, as the case may be, is or are required to be carried out as respects one or more than one proposed modification that would, if made, be a material alteration of the Proposed Variation / Draft Local Planning Framework.

The CE shall, not later than 2 weeks after a determination with respect to SEA / AA specify such period as he or she considers necessary following the determination as being required to facilitate an assessment.

The planning authority shall publish notice of the Proposed Material Alteration, and where appropriate in the circumstances, the making of a determination with respect to SEA / AA, in at least one newspaper circulating in

its area.

The notice shall state –

- that a copy of the Proposed Material Alterations and of any determination by the authority that an SEA / AA is required may be inspected at a stated place or places and at stated times, and on the authority's website, during a stated period of not less than 4 weeks (and that copies will be kept for inspection accordingly), and
- that written submissions or observations with respect to the Proposed Material Alterations or a SEA AA and made to the planning authority within a stated period shall be taken into account by the authority before the variation of the development plan is made.

Formally, making a variation is done by resolution of the Council.

In making a variation to a development plan, the members are restricted to considering the proper planning and sustainable development of the area, the statutory obligations of a local authority and any relevant policies or objectives of the Government or any Minister of the Government.

Where a planning authority makes a variation in a development plan, it shall publish a notice of the making of the variation in at least one newspaper circulating in its area. A variation made to a development plan shall have effect from the day that the variation is made.

This matter is to be on the agenda for consideration at the County Council meeting on **13 April 2026**.

1.5 Consideration of submissions

A full list of the submissions received, with hyperlinks to the submission on the website, is available to view in Part 3. Each submission made has been summarised and assessed in Part 4 of this report.

Part 4 is broken into 12 No. sections –

Part 4.1 relates to submissions from prescribed bodies and state/semi-state bodies. This part is organised by submitter and addresses the issues in the order set out in the submission.

Parts 4.2 - 4.12 deal with general submissions from the public; these parts are organised by topic, rather than by submitter. The topic order is as per the order topics are set out in the Proposed Variation / Draft LPF.

Part 4.2.13 deals with submissions on the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

For ease, a full list of all of the Chief Executive's Recommended Alterations is provided in Part 2 of this report.

This report is submitted to the Council Members for their consideration.

Part 2 Chief Executives Recommended Alterations to Proposed Variation / draft LPF

To follow is a list of the Chief Executive's **Recommended Alterations** to the Proposed Variation / Draft Local Planning Framework.

New text is shown in red, deleted text in ~~blue~~.

The **Recommended Alterations** are presented in the order they would appear in the Proposed Variation / Draft Local Planning Framework, with the relevant section of the Proposed Variation / Draft Local Planning Framework identified.

With respect to environmental matters:

1. The Recommended Alterations to the Proposed Variation / Draft Local Planning Framework as set out in this document would further contribute towards provisions related to sectors and topics that are already provided for within the Proposed Variation / Draft Local Planning Framework and the existing County Development Plan. Taking into account the measures that have already been integrated into the Proposed Variation / Draft Local Planning Framework, and the existing County Development Plan that provide for and contribute towards environmental protection, environmental management and sustainable development, any potential effects arising from these changes would either: be present already (beneficial) and would be further contributed towards, but not to a significant extent; and/or would be mitigated so as not to be significant (adverse). Taking this into account, these changes would not be likely to result in significant environmental effects.
2. There are no additional sources for effects on European sites arising from the Recommended Alterations to the Proposed Variation / Draft Local Planning Framework as set out in this document that have not been considered by the Appropriate Assessment to date. Taking into account the mitigation measures that have already been integrated into the Proposed Variation / Draft Local Planning Framework and the existing County Development Plan, these recommended changes would not affect the integrity of any European site.

Section B.1 Town Centre Regeneration

No.	Section	Recommended Alterations
1	B.1.4 Opportunity Site 1 - The Alps	<p>Alter the text as follows</p> <p>Objectives OP1</p> <ul style="list-style-type: none"> The topographical challenges of this site area are recognised. Proposals shall carefully balance the challenges of this site with its highly accessible town centre location whilst been sensitive to its immediate built and natural context, including Protected Structure (A39 – Former Ormonde Cinema) and the Ormonde Castle National Monument (WI040-029002-Castle - Anglo-Norman masonry castle), and its location within an area of Archaeological Significance or Potential (Arklow Town). Proposals shall demonstrate how they accord with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.
2	B.1.4 Opportunity Site 2 - Main Street	<p>Alter the text as follows</p> <p>Objectives OP2</p> <ul style="list-style-type: none"> Any new scheme should seek to protect the character and appearance of the traditional shop fronts including the Morgan Doyle facade and canopy and any architectural details on buildings of high architectural value wherever possible. Development shall take account of the site's location within an Area of Archaeological Significance or Potential (Arklow Town) and appropriately protect any heritage assets.

B.4 Economic Development and Employment

No.	Section	Recommended Alterations
3	Arklow Employment Objectives	<p>Include new Objective ARK X:</p> <p>ARK XX 'To continue to facilitate the development of large-scale employment development (including ICT development and associated energy infrastructure) on E zoned lands at Avoca River Park and Bogland / Money Big'.</p>

Section B.5 Tourism Development

No.	Section	Recommended Alterations
4	B.5 Tourism & Recreation Objectives	<p>Alter Objective ARK 35 as follows:</p> <p>'To support and facilitate the improvement of existing and the development of additional recreational infrastructure at beaches, harbours and coastlines in the LPF area, including (but not limited to):</p> <ul style="list-style-type: none"> ▪ improvements to coastal access, including for those with disabilities, in particular Improvements to the visual and physical connectivity between the town centre and Arklow South Beach,; ▪ improvement of existing or development of new toilets, changing facilities, waste disposal facilities etc; improvement of existing or development of new appropriately scaled and located car parking; ▪ infrastructure supporting swimming, sailing, marina/quayside berthing, rowing and other water sports, and shore fishing subject to ensuring no adverse environmental or visual impacts.'

Section B.6 Social & Community Development

No.	Section	Recommended Alterations
5	B.6 Social & Community Development Objectives	<p>Alter Objective ARK43 as follows:</p> <p>'Having regard to the potential longer term education needs in the Arklow area which have not been determined at this time but may arise; the physical and environmental constraints present in the area; and the space required particularly for new secondary schools, the development of new schools shall be permissible in principle in all land use zones in this LPF, other than OS1 and OS2, subject to the following criteria (in addition to all normal planning considerations) being fulfilled:</p> <ul style="list-style-type: none"> ▪ In order to ensure an appropriate spatial distribution of schools throughout the LPF area and to ensure maximum accessibility of all residential areas to schools, no new primary school shall be located within a 10-minute walking time of any existing primary schools or no new secondary school shall be located within a 20-minute walking time of any existing secondary schools; ▪ The site has excellent public transport and active travel infrastructure in situ, or planned and committed to coincide with a new school opening at the site; ▪ No such development will be considered on lands in existing community use where the loss in the use / facility is not being made up for elsewhere within the settlement. ▪ In relation to flood risk, the sequential approach shall be applied in site planning, to ensure no encroachment onto, or loss of flood plain. Only water compatible development such as Open Space will be permitted for lands which are identified as being at risk of flooding'

Section B.7 Heritage, Biodiversity & Green Infrastructure

No.	Section	Recommended Alterations
6	B.7 Heritage, Biodiversity & Green Infrastructure Objectives	Include new Objective ARK XX: ARK XX Development, where relevant, should have regard to the structure and setting of Arklow/Ormonde Castle'.
7	B.7 Heritage, Biodiversity & Green Infrastructure Objectives	Alter Objective ARK 57 as follows: 'To ensure development is planned in a manner that has appropriate regard to specific ecological sensitivities associated with the Arklow area, including those associated with pNHAs within and around the Arklow LPF area the Arklow pNHA, the Avoca River, coastal habitats and species, and sites suitable for wintering birds. In particular, to ensure the protection and where possible the restoration of the biodiversity associated with Avoca River and its riparian (bankside) habitats. Proposals for development at or in the vicinity of the Avoca River should be informed by ecological surveying and ecological impact assessment.'

Section B.8 Physical Infrastructure

No.	Section	Recommended Alterations
8	Infrastructure Objectives	Alter Objective ARK 77 as follows: To promote and support the delivery of connections which would significantly reduce walking times to Arklow Train Station including but not limited to the following: <ul style="list-style-type: none"> ▪ The provision of a new link/bridge over the railway line between Arklow Train Station and Tesco; ▪ A new pedestrian/cycle link between Yellow Lane and Arklow Train Station; ▪ Improvements to existing pedestrian links between the Main Street and the Train Station in particular Ditch Lane and Tom's Lane. <p>These links shall be designed to high-quality standards, fully accessible, and integrated into the broader town centre regeneration and public-realm improvement programmes. (PT4)</p>
9	Infrastructure Objectives	Add new objective as follows ARK-XX To support and promote the implementation of the recommended measures set out in the Local Transport Plan.
10	Infrastructure Objectives	Add new objective as follows ARK-XX To support the development and optimisation of off-street car-parking facilities in or adjacent to the town centre so that on-street, all-day parking can be relocated. On-street spaces shall be managed and

		repurposed where feasible to favour set-down/drop-off areas, short-stay visitor parking and active loading rather than long-stay parking.
11	Infrastructure Objectives	<p>Add the following objective to the LPF:</p> <p>ARK XX Public-realm works in Arklow town centre (including lighting, street furniture, paving and signage) shall wherever feasible be carried out in a coordinated, locally distinctive manner which advances high-quality design, reduces visual clutter, reinforces the town's heritage, and improves the overall visitor and community experience, in particular:</p> <ul style="list-style-type: none"> ▪ New lighting, wiring and communications infrastructure shall be placed underground wherever feasible, to reduce over-head cabling, poles and visual intrusion. ▪ Lighting design shall wherever feasible be site-specific, using decorative standards in plazas and along quays, emphasising heritage frontages, town-centre gateways and riverside links ▪ The public-realm works shall wherever feasible reflect Arklow's heritage (boat-building, pottery, seaside identity) and integrate craft/design elements, coordinated across streets, junctions and the waterfront to create a cohesive sense of place. ▪ Infrastructure renewal shall wherever feasible, be planned and delivered as part of a comprehensive public-realm master-scheme rather than piecemeal, ensuring continuity of design, materials, branding and quality across the town-centre regeneration area.
12	Infrastructure Objectives	<p>Add new objective as follows</p> <p>ARK-XX To protect the strategic function of the N/M11 in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.</p>
13	Flood and Coastal Management Objectives	<p>Alter the wording of Objective ARK 85 as follows:</p> <p>'Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this LPF OR in Flood Zone C but within an area:</p> <ul style="list-style-type: none"> ▪ that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or ▪ that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to nearby watercourses that lack corresponding indicative flood zones; ▪ that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF; <p>shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as</p>

		may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.'
14	Infrastructure Objectives	<p>Alter the wording of Objective ARK 88 as follows:</p> <p>ARK 88 To require that the development of Public Utility lands on the eastern western side of the Dublin Road to facilitate the expansion of the existing electricity substation comprise of high-quality design and boundary treatments, include planting and landscaping proposals to mitigate their visual impact having regard to their prominent location along the northern gateway entrance to Arklow Town.</p>

B.10 Specific Local Objectives

No.	Section	Recommended Alterations
15	SLO 2 Southern Waterfront Zone	<p>Alter SLO 2 objective -</p> <ul style="list-style-type: none"> Maintaining ease of access to the waterfront for existing and future marine users (such as the Sea Scouts and Arklow Rowing Club) as well as emergency services shall be a key consideration in the regeneration of this area.

No.	Section	Recommended Alterations
16	SLO 5 Kilbride	<p>Alter SLO 5 objective -</p> <ul style="list-style-type: none"> An area of 5ha zoned CE: Community & Education shall be reserved to facilitate the planned development of a new school campus (primary and post primary). 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 a schools campus.
17	SLO 5 Kilbride	<p>Alter SLO 5 objective -</p> <p>To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct residential areas (not exceeding 150 200 units) each containing materially different house designs and typologies within an overall unified theme.</p>
18	SLO 5 Kilbride	<p>Add additional objective -</p> <ul style="list-style-type: none"> Development of this SLO shall ensure that views of the Howard Mausoleum from Ferrybank, and local road L-6179 Ticknock – Kilbride are maintained where feasible.

Recommended Alterations to Maps

Map No.1 Land Use Map

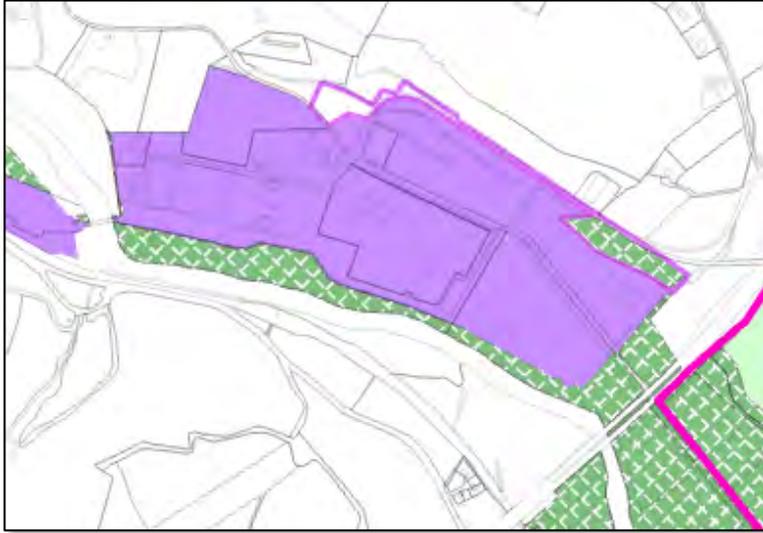
No.	Section	Recommended Alterations
19	Kynoch Lodge	<p data-bbox="411 376 1439 450">Change c. 0.96ha of 'RE – Existing Residential' to c. 0.83ha 'T – Tourism' and c. 0.13ha 'OS1 – Open Space'</p> <p data-bbox="411 499 584 533">Change from:</p>  <p data-bbox="411 1261 549 1294">Change to:</p> 

20

**Avoca
River Park**

A: Change c. 1.32ha from 'OS2 Natural Areas' to 'E – Employment'
B: Change c. 1.4ha from 'unzoned' to 'E – Employment'

Change from:



Change to:



21

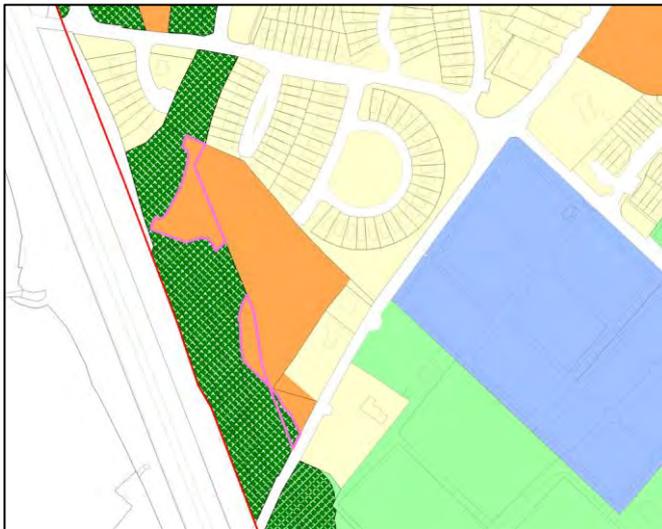
Lamberton

A: Change c. 0.3ha from 'OS2 Natural Areas' to 'RN2 – New Residential'
B: Change c. 0.04ha from 'RN2 - New Residential' to 'OS2 Natural Areas'

Change from:



Change to:

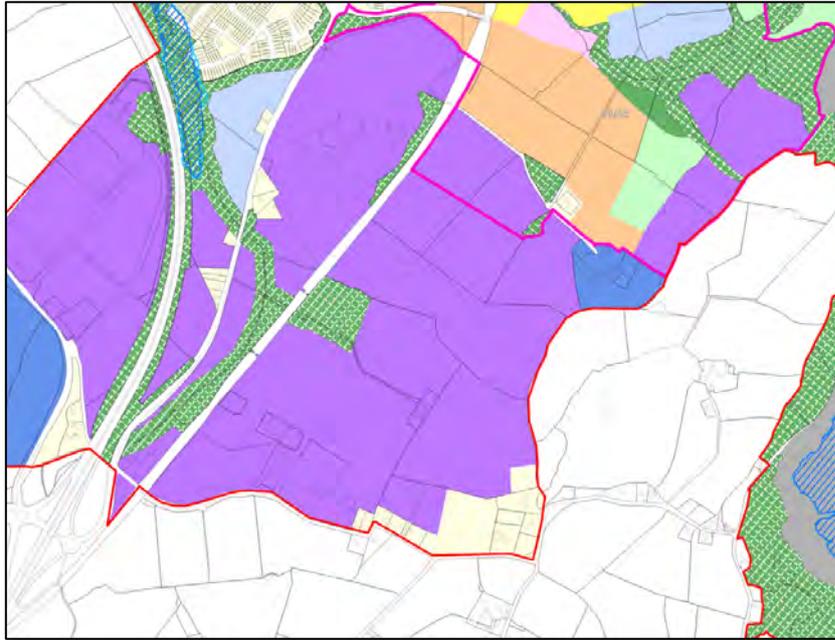


22

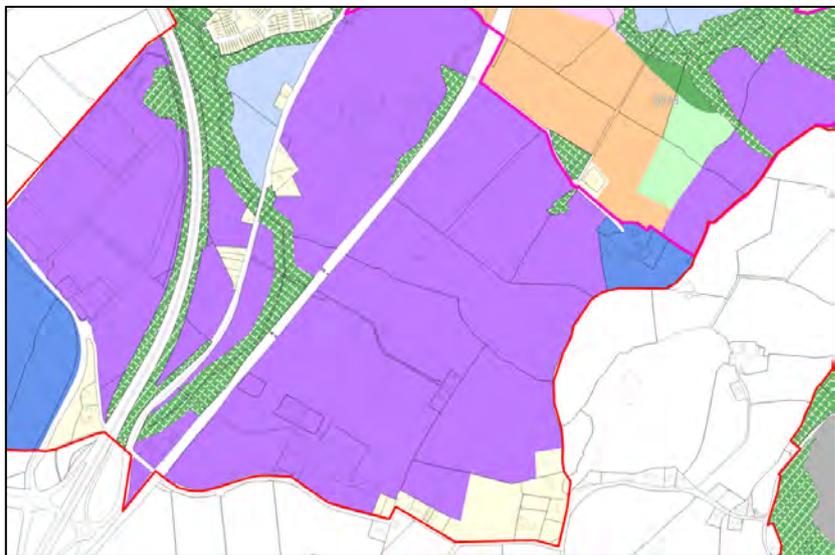
Money Big

A: Change c. 2.5ha from 'OS2 – Natural Areas' to 'E – Employment'
B: Exclude c. 6.1ha of 'E' zoned land from SLO4

Change from:



Change to (including altered SLO4 boundary):



Appendix

No.	Section	Recommended Alterations
23	SFRA appendix	Update flood mapping as detailed in Addendum I to the Strategic Flood Risk Assessment

Part 3 List of Submissions

A list of submissions to Proposed Variation No. 5 / Draft Arklow Local Planning Framework is set out below. Each name is a hyperlink to the submission online on the www.wicklow.ie website.

Reference Number	Name	Portal Reference / By post/hand
1	Adrian	220425
2	Sunbeam House Services/Thomas Redmond	155848
3	Pauric Hyland	Post by hand
4	Paul Maher, Michele Maher (nee Duggan), Paula Tom and Andrew Maher	175149
5	Environmental Protection Agency	151312
6	Edward Breen	184220
7	Transport Infrastructure Ireland (TII)	123215
8	Arklow Maritime Heritage Museum	Post by hand
9	Paul Byrne	084713
10	Sarah Glennane	183651
11	Bernard Fox	145338
12	EirGrid	162716
13	Eion J Barnes	221811
14	Barbara Power	224347
15	Elizabeth Fitzgerald	153136
16	Arklow United FC	063341
17	Lloyd Hotel Group	093233
18	William Keogh	141932
19	OPW Flood Risk Management	150547
20	Paschal Bermingham	150807
21	The Maritime Area Regulatory Authority	153824
22	Elizabeth Battye	183236
23	Aleksandra Chromik	210440
24	Arklow Properties Limited	090643
25	Arklow Ferrybank Developments	094108
26	An Post	090932
27	National Environmental Health Agency HSE	141725
28	Marion Rueter	142444
29	Department of Education and Youth	153610
30	Uisce Éireann	160035
31	Meath County Council	155850
32	Tom & Pat Redmond	164216
33	P & B Bermingham	201930
34	Fine Gael Arklow & Rathdrum Branch	202828
35	Shane Bermingham	202659
36	Keith Scanlon	084456
37	Brian Brennan TD	91304
38	Drom Mor Construction Ltd	092941
39	Sandra Hall	091725
40	Knockinver Limited	095609
41	Cecil and Julie Alexander	100917

42	National Transport Authority	094122
43	St. Benedict Inbhear Mor AC	103009
44	Carina Holmes	120852
45	Lowick Homes	120525
46	Patrice & David Torbet	133843
47	Elizabeth Cannon	134302
48	Paul Maher	132433
49	Echelon Data Centres	142730
50	Department of Climate, Energy and the Environment	143339
51	Cllr. Warren O'Toole	153414
52	Echelon Data Centres	143521
53	Mellon & Kavanagh	140931
54	All kinds of amazing	144518
55	Cllr Peir Leonard	150524
56	Cllr Warren O'Toole	155026
57	Deirdre Ryan	161402
58	Michael & Michelle Kavanagh	Post by hand
59	Patrick Gregan and Richard Conroy	Post by hand
60	Office of the Planning Regulator	161133
61	Profile Properties	161714
62	KWETB Youth work, CWP/ECRDATE, & Crosscare EWYS	095949
63	J Mellon, D Kavanagh & C Mellon	160707
64	Cairn Homes Properties Ltd	163518
65	Echelon Data Centres	165059
66	Jonathan O'Toole	165620
67	Iarnród Éireann	164252

Part 4 CONSIDERATION OF SUBMISSIONS

4.1 Prescribed Bodies / State Organisations

Submission have been received from the following prescribed bodies. An Post is not a prescribed body but has been included in this section as it is a state-owned body.

- 4.1.1 Office of the Planning Regulator (No. 60)
- 4.1.2 National Transport Authority (No. 42)
- 4.1.3 Environmental Protection Agency (No. 5)
- 4.1.4 Transport Infrastructure Ireland (No. 7)
- 4.1.5 EirGrid (No. 12)
- 4.1.6 OPW Flood Risk Management (No. 19)
- 4.1.7 The Maritime Area Regulatory Authority (No. 21)
- 4.1.8 An Post (No. 26)
- 4.1.9 National Environmental Health Service HSE (No. 27)
- 4.1.10 Department of Education and Youth (No. 29)
- 4.1.11 Uisce Éireann (No. 30)
- 4.1.12 Meath County Council (No. 31)
- 4.1.13 Department of Climate, Energy and the Environment (No. 50)
- 4.1.14 Iarnród Éireann (No. 67)

4.1.1 Office of the Planning Regulator

No.	Link to submission
60	Office of the Planning Regulator

Item 1 Preamble

As Wicklow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the Variation has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.

Chief Executive Response

Noted

Item 2 Overview

The Office welcomes the preparation of the proposed Variation and notes the overall approach of the Planning Authority to addressing the Revised National Planning Framework (2025) (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly in accordance with section 13 of the Act.

The proposed Variation comes at an opportune time to capitalise on the recent significant investment in the Arklow Wastewater Treatment Plant which was completed in 2025. The proposed Variation is therefore timely and significant in terms of supporting the growth and development of the town.

Arklow is identified as a Self-Sustaining Growth Town in the RSES and is identified for growth in residential, employment and service sectors, and as a growth centre which should become more economically self-sustaining and a key focus for economic growth in County Wicklow. The Office recognises the strong focus of the Economic Development and Employment Strategy of the proposed Variation which targets a growth in the jobs ratio from 70% to 105% for Arklow by 2031, with a wide range of employment objectives including development of brownfield sites (Waterfront Zones) and ample greenfield zoning with the acknowledgement of potential for development of the renewable energy sector and notes objectives ARK 27, ARK 28 and ARK 29, in this regard.

The Office welcomes the focused Specific Local Objectives (SLO) 1-2 for waterfront regeneration sites to support mixed use, high density residential, commercial, leisure, and public realm improvements, and SLO 3-5 for new residential neighbourhoods to be phased in line with infrastructure delivery with distinct residential areas and integrated open space.

The Office also welcomes the identification of two significant opportunity sites for town centre regeneration namely 'The Alps' site and 'Main Street' site.

The focused tourism policy objectives including the support of the future development of the proposed Arklow to Shillelagh Greenway and the range of objectives to improve the tourism product in Arklow including maximising the town's coastal location is also supported.

In relation to housing delivery, the recently published NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements) require planning authorities to vary their development plans to reflect the housing growth requirements set out in the appendix 1 to these guidelines, and to provide for additional provision in terms of residential zoned land. The Office understands that a process to implement these guidelines is currently being undertaken by the Planning Authority, and the Office acknowledges the challenges involved in co-ordinating the Variation process to provide an overall strategy for the development of Arklow with the separate forthcoming Variation to apply the guidelines.

Given these changes to the policy context, however, the Office has made a recommendation in relation to the Residential Phase 2 lands particularly where these lands are serviced/serviceable and well-located in terms of the services and amenities of the town (including the train station).

In relation to sustainable transport and mobility which will be important in terms of reducing greenhouse gas emissions and delivering sustainable communities over the lifetime of the proposed Variation, the Office recommends amendments to further support the implementation of the Local Transport Plan (LTP), and in relation to flood risk the Office recommends amendments to ensure that risk of flooding to people and property is avoided and managed.

With the exception of the specific concerns set out below, the proposed Variation otherwise sets out a clear zoning strategy and framework for the future development of the lands concerned. The issues raised below largely focus on supporting the delivery of the vision of the proposed Variation and building on the ambition of the County Development Plan to develop well serviced, well connected and sustainable neighbourhoods, and promote sustainable modes of transport.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out three (3) recommendations and one (1) observation under the following key themes:

Chief Executive Response

Noted – the OPR's recommendations and observation are considered in detail below.

Item 3 Consistency with core strategy and housing requirements

The proposed Variation clearly sets out the context for housing and population growth in Arklow against the core strategy of the County Development Plan, including details of housing completions, extant permissions and current applications for planning permission. This analysis demonstrates that housing delivery has stagnated in Arklow over the past intercensal period and over the lifetime of the Arklow and Environs Local Area Plan 2018- 2024 due to the wastewater constraints.

The proposed Variation to provide a development framework for Arklow up until 2028, including the zoning of lands for housing, is being carried out alongside a future Variation to implement the Housing Growth Requirements. The Office would therefore encourage the Planning Authority to reconsider the need for phasing at this point in time, and instead review and rezone, where otherwise appropriate, Residential Phase 2 lands as Phase 1 in order to provide flexibility in delivery of sites and to facilitate the ongoing pipeline for housing delivery and to meet the housing growth requirements as set out in the Housing Growth Requirements.

Recommendation 1 – Residential Zoned Land

Having regard to the need to provide sufficient housing lands and growth for Arklow and the provision of new homes at locations that can support compact growth and sustainable development, and in particular to:

- **NPO 3, NPO 9 of the NPF;**
- **RPO 3.1, RPO 3.2 of the RSES;**
- **the policies and objectives of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements); and**
- **section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022),**

the Office recommends that the Planning Authority:

- (i) reviews the zoning objective for the proposed Residential Phase 2 lands with a view to rezoning as Residential Phase 1 lands that can support compact growth and sequential development and are serviced or serviceable within a reasonable period of time, to ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements.**

Chief Executive Response

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through Variation No. 5. Variation No. 5 does not propose wider changes to the CDP other than those needed to establish the new land use framework for Arklow.

The OPR's submission has noted the publication of the "*NPF Implementation: Housing Growth Requirements*", in July 2025, which included new housing targets for Wicklow, which has necessitated a review of the CDP beyond the remit of Variation 5 itself. Wicklow County Council's (WCC) implementation of these requirements, and how it affects the Arklow LPF is outlined below.

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, the variation also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1

All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040, and the provision of supports for the delivery of housing that has already been granted planning permission.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 with submissions invited. The Chief Executive’s Report on the submissions received to the proposed variation was issued to the Elected Members in February 2026 for their consideration. The Variation may be made following on from this or Proposed Material Alterations to Variation 6 may be proposed.

Draft Arklow LPF: Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From **Section 3.0: Introduction**

Whether zoning objectives are outlined in this development plan or in subsidiary local plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local plan

From **Section 3.4: Zoning**

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.

In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provide flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will be considered for permission on the same footing as RN1 lands, and Objective ARK 18 will be superseded. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

With regard to the servicing status of lands please note -

The CE is satisfied that in the Arklow LPF:

- All lands zoned for Town Centre, Mixed Use, Waterfront and infill development in Existing Residential areas are serviced.
- All lands zoned for Priority 1 New Residential are serviced.
- All lands zoned for Priority 2 New Residential are either serviced or serviceable.

As per Table A:1.1 of the Arklow LPF, only locations that are already served, or are serviceable with water and wastewater infrastructure shall be identified for new development. A:3.2.1 also confirms that greenfield lands identified for new residential and employment development are:

- serviced or serviceable with footpaths and cycleways
- within c.30 minutes' walk time of a train station;
- within c. 15 minutes' walk time of an existing or a committed bus service;
- located within a c. 15 minutes' walk of the town centre.

Accordingly both new Residential Priority 1 and Priority 2 lands are serviced or serviceable.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Sustainable Transport

The Office welcomes the preparation of the LTP using the Area Based Transport Assessment Advice methodology, which supports the integration of land use and transport planning by including a range of measures to improve sustainable transport.

The overarching aim of the LTP is to promote a modal shift from private car to sustainable modes during the plan period or to promote sustainable mobility. This will be essential to achieving national mandatory climate action targets to reduce greenhouse gas emissions by 51% by 2030.

Having clear modal shift objectives would assist with achieving these targets and the Office recommends the inclusion of ambitious but realistic mode share targets for Arklow together with an effective monitoring programme within the proposed Variation.

While the LTP sits alongside the proposed Variation, and local transport objectives ARK 68- 82 and map No. 6 Active Travel Strategy are included, the Office is concerned the LTP measures and strategy have not been adequately prioritised/phased and integrated into the proposed Variation and recommends that more explicit policy support for the implementation of each preferred modal strategy and associated intervention is provided.

Priorities around existing deficits within the Arklow area, particularly connectivity to proposed new development areas are encouraged and the Office recommends that priority projects to be progressed during the plan period are identified within the proposed Variation, together with implementation timeframes.

Recommendation 2 – Integration of land use and sustainable transport

Having regard to the need for integration of land use and sustainable transportation, and in particular to:

- **NPO 107 and National Strategic Outcome 5 of the NPF (sustainable mobility);**
- **NPO 93 of the NPF (air quality);**
- **RPO 8.6 of the RSES (Local Transport Plan (LTP)); and**
- **the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emission by 51%, the Climate Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021),**

the Office recommends that the Planning Authority:

- (i) identifies priority active travel projects and parking options to be progressed during the plan period together with timeframes;**
- (ii) incorporates the measures and proposed modal networks, identified in the LTP, and includes policy support and clear mapping for the proposed interventions which identifies connectivity for existing and proposed active travel networks and public transport networks for existing and proposed residential, employment lands and retail sites;**
- (iii) includes mode share targets for Arklow together with an effective monitoring programme; and**
- (iv) incorporates consistency between terms used in the proposed Variation and LTP, for example interventions, recommendations, and measures, to ensure all LTP measures are adopted and implemented correctly.**

Chief Executive Response

In response to the specific OPR recommendations:

- (i) identifies priority active travel projects and parking options to be progressed during the plan period together with timeframes;**

Both the LTP and LPF identify a series of Active Travel Projects. These are identified on LPF Map No. 6 (Active Travel Strategy). Point No. 10 in the LPF's 'Overall Strategy' outlines six priority transport / accessibility scheme in Arklow:

10. To support the following priority transport / accessibility schemes in Arklow:

- (a) Provision of improved active travel connections (walking / cycling) over the River Avoca east of the Nineteen Arches Bridge linking the Town Centre and South Quay to North Quay and the Bridgewater Shopping Centre,
- (b) Provision of an Active Travel Bridge over the River Avoca west of the Nineteen Arches Bridge linking the Town Centre and River Walk to Ferrybank and Kilbride,
- (c) The improvement of the public realm and overall pedestrian environment for all users in the Town Centre in particular along Main Street/Main Street Lower,
- (d) The continued provision of new / improved footpaths and cycleways on all regional roads leading into the town,
- (e) The construction of the SPAR (Southern Port Access Road) which aims to reduce the volume of HGVs from the town centre, enhancing this environment for pedestrians, and
- (f) To carry out a feasibility study, including environmental studies, regarding the provision of a second vehicular bridge crossing over the River Avoca between the Nineteen Arches Bridge and the M11.

Within the LTP, Table 19-1 outlines short term (up to 2028), medium term (up to 2031) and long term (up to 2042) objectives for each of the LTP's recommended measures.

Nevertheless, the CE agrees that it would be worthwhile updating Table 19-1 to instead identify specific interventions recommended within the LTP and the proposed timeframes for delivery. The Local Transport Plan will be reviewed and updated in due course, as the LPF progresses taking into account any Proposed Material Alterations.

- (ii) incorporates the measures and proposed modal networks, identified in the LTP, and includes policy support and clear mapping for the proposed interventions which identifies connectivity for existing and proposed active travel networks and public transport networks for existing and proposed residential, employment lands and retail sites;**

As outlined above, the LPF has incorporated the relevant LTP measures within its objectives as clearly shown on Map No. 6 (Active Travel Strategy) and supported by the following LPF objectives:

ARK 68 Support the implementation of the recommendations of the (Draft) Local Transport Plan with regard to the delivery of proposed road safety measures and safe active travel routes along the existing road network and along new off-road routes having regard to the following:

- The delivery of the National Cycle Network, as it relates to the LPF area;
- The delivery of the Greater Dublin Area cycle network, as it relates to the LPF area;
- To continue to promote and encourage the "Safer Routes to School" and the 'Green Schools Programme' within Arklow and to liaise with all relevant Departments/agencies involved in the operation of the programme.

ARK 69 To improve the safety, accessibility, and attractiveness of the pedestrian environment and support the delivery of improved cycle and pedestrian infrastructure as funding allows along Arklow's Central Spine route as identified in the (Draft) Local Transport Plan and feeder routes and in particular the following:

- **Dublin Road and Ferrybank:** Continuation of footpath provision and segregated cycle infrastructure from the bridge north of Beech Road to the town centre via Ferrybank, where carriageway width permits **(AT 5 - AT 6)**
- **Wexford Road:** Continuation of footpath provision and segregated cycle infrastructure from Northwood / Knockmore roundabout to the Coolgreaney Road / Upper Main Street junction **(AT 3)**
- Delivery of the **Vale Road Pedestrian Improvement Scheme** in the short term **(AT 9)**

- **Local junction improvements** to DMURS standards **(CY 2)**
- **Improve existing pedestrian crossings** and provision of **new crossings** at desire lines **(WK 1)**
- **Improve existing footpath provision**, including resurfacing and widen where necessary **(WK 1)**
- **Major junction improvements** to DMURS standards **(CY 2)**
- **Provide gateway and transition zone** treatments on the approach to the built-up area of Arklow **(CY 2)**
- **Provide gateway treatment** on Sea Road and Vale Road to signal the approach into a low-speed town centre **(CY 3)**
- Creation of a **Quietway** on Fernhill between Wexford Road and Coolgreaney Road, parallel to Emoclew Road **(PY 16)**
- To identify a **network of other quietways** where appropriate, in consultation with relative stakeholders **(CY 4)**
- In the long term to assess **feasibility of dedicated cycling facilities on Coolgreaney Road** to build on the **Vale Road** Pedestrian Improvement Scheme **(AT 10)**
- Design all transport and public realm projects in line with the **DMURS User Hierarchy** and **design standards**, and with the principles set out in the LPF **(WK 1)**

ARK 70 To support the **enhancement of the town's existing laneways network** and to progress as funding allows, the development of new and improved permeability linkages through the LPF area and identify other suitable permeability routes/ improvements within the settlement **(PY 1-30)**

ARK 71

- To seek the delivery of new or enhanced **pedestrian and cyclist through routes through OS1 lands** and existing residential open spaces.
- To require that all new developments identify and deliver direct and safe **new pedestrian and cyclist permeability routes** to existing and proposed public transport nodes, active travel routes and where practical into the existing adjoining built up areas. **(PY 1)**

ARK 72 To overcome overreliance on the Nineteen Arches Bridge and improve pedestrian and cycle connectivity between the north and south of the river, by promoting and supporting the development of;

- The **Kilbride Pedestrian and Cycling Bridge** between the Avoca River Walk and Arklow Town Marsh/Ferrybank, including associated **east-west pedestrian links** connecting this crossing with Ferrybank / Dublin Road (short/medium term), the River Avoca Industrial Park (long term) and Arklow to Laragh Greenway (long term) **(AT 1, AT 15, AT 19, CY 2)**
- Improved active travel infrastructure linking the Bridgewater Shopping Centre to Main St. which could be in the form of additional capacity added to the existing Nineteen Arches Bridge or the provision of a new active travel bridge to the east of same **(AT 2)**
- Such development shall be suitably informed by ecological surveying, ecological impact assessment, AA Screening/AA and EIA Screening/EIA, as the case may be, with a view toward avoiding and preventing significant adverse effects on receiving environmental sensitivities. Such development shall be appropriately shaped and guided by environmental and ecological constraints in the receiving environments.

ARK 73 To improve the existing **Avoca River Walk** by promoting and supporting the following improvements:

- Widening the existing path and entrances according to standards set out in national policy and guidance;
- Improved lighting and wayfinding, in particular at access points;
- The provision of age-friendly seating along the route;
- Improved accessibility for people with additional mobility needs from St Mary's carpark;

- Ensuring a seamless transition between existing active travel facilities on Vale Road and Ballyraine Lane with the Arklow-Shillelagh Greenway; and
- **In the long-term:** Providing a new walking and cycling link to Vale Road utilising the old railway bridge north of Glendale.
(AT 17-18, CY 5)

ARK 74 Within the **Town Centre** to support and promote the enhancement of the public realm by:

- Supporting the development of the **Southern Port Access Route** to facilitate the reduction of HGV traffic from the town centre.
- Reallocate road space to widened footpaths, buildouts, pedestrian crossings, street trees, public seating and spill out areas for local businesses;
- Create safer and more legible connections for pedestrians and cyclist via the existing network of laneway to the quays with improved lighting and wayfinding.
(AT 4, AT 23, WK 2, WK4)

ARK 75 With regard to accessibility and the public realm, it is an objective to:

- Address **street clutter** in particular in the town centre and to implement a programme to remove unnecessary signage, guardrails advertising, poles and other obstacles which clutter the public realm and impede pedestrian movement;
- Ensure that future improvements to the public realm and active travel **network are accessible to all**;
- Ensure that all streetscape and public realm improvements follow the principles of **Universal Design** and consider the safety and perception of public spaces so that all members of the community feel welcome and safe.

(WK 2, 5 - 8)

ARK 76 To promote and support the delivery of a suite of active travel and place making measures on the **North and South Quays** including but not limited to the following:

- The provision of active travel facilities on both quays;
- Enhanced connectivity and permeability onto the quays from side streets.
(AT 13-14)

ARK 77 To promote and support the delivery of connections which would significantly reduce walking times to **Arklow Train Station** including but not limited to the following:

- The provision of a new link/bridge over the railway line between Arklow Train Station and Tesco;
- A new pedestrian/cycle link between Yellow Lane and Arklow Train Station;
- Improvements to existing pedestrian links between the Main Street and the Train Station in particular Ditch Lane and Tom's Lane.

(PT4)

ARK 78 To cooperate with NTA, Iarnród Eireann and other relevant transport planning bodies in the delivery of a high quality, integrated and accessible transport system in the LPF area. In particular to support and facilitate the following schemes / programmes:

- The improvement of mainline train services as set out in the Government's AISRR, including (but not limited to)
 - The introduction of an hourly shuttle service between Wexford-Greystones-Arklow;
 - The delivery dual tracks between Dublin and Wexford on a phased basis, serving Arklow in the long term.
- To support and facilitate improvements to Arklow Train Station as funding allows including the provision of a new footbridge with lifts to improve accessibility to both north and southbound services.

- *The improvement of existing and provision of new bus services within the LPF area and linking the LPF area to the wider region (but not limited to):*
 - *Supporting the development and delivery of bus service enhancement projects, and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;*
 - *Facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted).*
 - *To support the development of a future dedicated town bus service for Arklow and Environs to support Arklow's long term planned growth.*

(PT 1 - 3)

ARK 79 *To support and promote the delivery of Templeraíney Park and Ride at Junction 20 of the M11 (PK 1)*

ARK 80 *To support the development of Mobility Points at appropriate highly visible and publicly accessible locations to encourage sustainable mobility and multimodal trips as the following locations:*

- a. *Castle Park Car Park*
- b. *St Mary's Car Park*
- c. *Inbhear Mór Square, Dublin Road (PK 5)*

Therefore, the LPF already contains comprehensive policy support for the various projects recommended within the LTP. Nevertheless, the CE considers that the LPF should more clearly support the implementation of the LTP in its entirety, and so it is recommended that a new objective be included in Part B:8 (Physical Infrastructure) of the LPF providing policy support for the recommended measures in the LTP.

(iii) includes mode share targets for Arklow together with an effective monitoring programme; and

Once the LPF has been finalised and adopted, the LTP will be updated to take account the final objectives and changes to land use zoning. The CE recommends that this final version also be updated to include modal share targets.

(iv) incorporates consistency between terms used in the proposed Variation and LTP, for example interventions, recommendations, and measures, to ensure all LTP measures are adopted and implemented correctly.

The CE recognises the need for land use planning and transport planning to be fully integrated. As per the NTA's guidance, the preparation of the LTP formed part of the LPF process and its recommended measures and projects have directly input into the LPF policy objectives.

It is important; however, to recognise the distinction between the two documents. The LPF is a land use framework for Arklow, while the Local Transport Plan (LTP) is a transport framework for the town. The two documents have different remits and applications, and apply over different timescales (LPF up to 2031, the LTA up to 2040). Any LTP measures included as objectives in the LPF should be appropriate for, and specific to, its remit as a land use framework for Arklow. Some of the measures and projects within the LTP are more appropriate for WCC's project delivery teams, such as the Roads Department or the Arklow Municipal District. This is why there is a distinction between the terminologies used within the plans: the LTP has recommended 'measures' whilst the LPF has policy 'objectives'.

Accordingly, specific policy objectives have been incorporated within the LPF's policy objectives where appropriate for a land use planning framework, e.g. Southern Port Access Road (ARK82) and the Templeraíney Park and Ride at Junction 20 of the M11 (ARK79). Nevertheless, as noted above, the CE agrees that the LPF

should more clearly support the implementation of the LTP in its entirety, and so it is recommended that a new objective be included in Part B:8 (Physical Infrastructure) of the LPF providing policy support for the recommended measures in the LTP.

Chief Executive Recommendation

Alter the LPF as follows:

Section B:8 Physical Infrastructure

Add new objectives

ARK-XX To support and promote the implementation of the recommended measures set out in the Local Transport Plan

Alter the Local Transport Plan:

The Local Transport Plan (LTP) will be updated once the Local Planning Framework has been finalised and adopted. The CE recommends that the updated version of the LTP includes:

- Updated Table 19-1 (Implementation Table) to identify potential timelines for the implementation of the recommended projects in the LTP.
- Modal share targets.

Item 5 Flood Risk Management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) in accordance with NPO 1 of the NPF and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

In line with the Flood Guidelines, the Office considers that the Planning Authority needs to address the following additional considerations in the assessment of flood risk in the Arklow area.

Firstly, as the complete set of watercourse mapping is not used for the SFRA, it is not clear how land use zonings have been determined and as such the Planning Authority should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA.

Secondly, flood risks from all sources of flooding should be identified and considered in the SFRA including Planning Authority applications to the Office of Public Works (OPW) for minor works schemes, past flood events recorded by the OPW and by the Planning Authority, and any planned flood relief schemes.

Finally, the Office notes that there are discrepancies between the flood zone mapping and the flood extent provided in the SFRA, with sections of the Flood Zone A omitted from the Flood Zone Map. The 0.1% Annual Exceedance Probability to define the flood zones for the flood relief scheme are not provided in the SFRA, and this should be reviewed to ensure flood zones are consistent with the data sets adopted.

In addition, the proposed Variation also provides an opportunity to provide an integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure to avoid reliance on individual site by site solutions, particularly in respect of the SLOs 3-5. Implementation of Urban Nature-based Solutions, Guidance Document for Planners, Developers and Developer Agents (2025) published by the Local Authority Waters Programme provides useful guidance in this regard.

Recommendation 3 – Flood risk management

Having regard to flood risk management, and in particular to;

- **NPO 78 of the NPF (avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test (Justification Test));**
- **RPO 7.12 of the RSES (avoiding inappropriate land use zonings and development in areas at risk of flooding and to integrate sustainable water management solutions in accordance with the requirements of the Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and**
- **the Flood Guidelines,**

the Office recommends that the Planning Authority:

- (i) reviews and amends the Strategic Flood Risk Assessment to:**
 - a) include mapping of all watercourses present in the Arklow area ensuring that it is fully consistent with the Justification Test as set out in the Flood Guidelines;**
 - b) include all zoned lands that can accommodate vulnerable uses and any zoning objective for highly vulnerable development (Flood Zone A or B) or less vulnerable development (Flood Zone A) that does not pass the Justification Test in accordance with the Flood Guidelines should be omitted; and**
 - c) address any discrepancies between the flood zone mapping and the flood extent provided, particularly in relation to extents of Flood Zone A which appear to be omitted from the Flood Zone Map; and**
- (ii) incorporate integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure in specific SLOs in order to avoid reliance on individual site by site solutions.**

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

Chief Executive Response

Mapping of watercourses

The watercourses shown on the maps accompanying the Draft Arklow LPF are derived from Water Framework Directive watercourse mapping developed by the EPA. Watercourses of more significant capacity have been evaluated by the OPW and County Development Plan to determine flood risk zones. In some cases, smaller watercourses, and watercourses that have been culverted for significant periods of time and may not follow the exact path shown, do not have corresponding flood risk zones; however it is considered necessary to show these watercourses for completeness, and to allow for further assessment at development management stage, where necessary. The CE is generally satisfied that the riparian buffer applied under CPO 17.26 would mitigate against flood risk along watercourses that don't have associated flood risk zones identified. (As per OPW records of previous flood extents, there are no records of past flood events along the paths of watercourses that don't have associated flood risk zones identified).

It is not realistic for a Stage 3 flood risk assessment to be carried out for all smaller or culverted watercourses during the timeframes available during the LPF making process. This would be more appropriate to be carried out at the development management stage through the carrying out of site-specific flood risk assessments. While the CE is satisfied that the current wording of Objective ARK 85 would allow for the planning authority to request SSFRAs for sites with the above watercourses, the CE is amenable to adding clarity in this regard.

Justification Test

In relation to Strategic Environmental Assessment and the Plan-making Justification Tests, the accompanying SEA Environmental Report makes references to flood risk throughout. The definition of the 'Water' environmental component within that Environmental Report specifically refers to flood risk. Flood Risk has been considered in the evaluation of environmental impacts of LPF implementation, with the mitigation measures set out in the Environmental Report making multiple references to flood risk. These mitigation measures are included in the County Development Plan and therefore apply directly in Arklow and have been transposed into the draft LPF/Variation as policy objectives, e.g. Objective ARK 85. The CE therefore considers that, alongside the SFRA, a flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the LPF/Variation preparation process, as indicated in the response to that question in each Justification Test.

In relation to the areas that will benefit from the flood relief scheme and residual risk, it is considered premature/not possible to identify these areas at this stage while detailed design for the flood scheme remains ongoing and the scheme is yet to be built. It is WCC's understanding that relevant flood mapping will be updated by the OPW upon completion of the flood relief scheme, identifying residual areas of risk within the existing flood extents.

Discrepancies between flood risk mapping and flood extent provided

Having reviewed the range of datasets included within the flood zone layers, and in light of the submission of the both the OPR and the OPW, the CE has updated the relevant flood mapping. Those areas now additionally found to be within a flood zone have been addressed in Addendum 1 to the Strategic Flood Risk Assessment, which accompanies this report. Any recommendations arising from this report in relation to rezoning will similarly be assessed using these updated zones. For clarity, Figure 2 as set out in the SFRA illustrates the flood extent that the Arklow Flood Relief Scheme caters for, that being the area corresponding to Flood Zone A. The scheme is not designed to cater for greater flood extents/probability and therefore this is not shown. However, the CE has reviewed flood mapping for greater extents (i.e. Flood Zone B) and is satisfied that the correct datasets have been utilised, in light of the commentary above.

Sustainable urban Drainage Systems (SuDS)

The Arklow SFRA sets out a schedule of 'mitigation objectives' in Section 5, which includes the following County Development Plan objectives, which will apply in the LPF area:

CPO 14.11 *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*

CPO 14.12 *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*

CPO 14.13 *Ensure the implementation of Sustainable urban Drainage Systems (SuDS) in accordance with the Wicklow County Council SUDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SUDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*

CPO 14.14 *Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SUDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.*

CPO 14.15 *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

The LPF also contains **ARK 90**, which is a specific objective relating to SuDS, which specifically refers to the LAWPRO 2024 guidance on Nature-based solutions:

- *Ensure the implementation of Sustainable urban Drainage Systems (SuDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system; these systems shall be maintained properly in accordance with relevant standards to ensure their continue efficacy.*
- *Developments, including new/expanded developments and any planned improvements to existing urban spaces, shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024*

The Draft LPF/Variation was also accompanied by a Green Infrastructure Audit, which assessed existing and potential green infrastructure elements throughout the LPF area. Map No. 3 sets out a comprehensive 'Key Green Infrastructure' network throughout the LPF area.

Therefore, it is not considered necessary to re-state or insert these SuDS objectives into the specific local objectives or land use zoning.

Chief Executive Recommendation

Update flood mapping in relation to the following:

- Strategic Flood Risk Assessment (see Addendum I)
- Map 4A Flood Risk – Present Day
- Map 4B Flood Risk – Present Day & Land Use Zoning

Alter the wording of Objective ARK 85 as follows:

'Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this LPF OR in Flood Zone C but within an area:

- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or
- **that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to nearby watercourses that lack corresponding indicative flood zones;**
- that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF;

shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.'

Item 6 Built Heritage

The Office recognises the identification of two significant opportunity sites for town centre regeneration, 'The Alps' site and 'Main Street' site, which are located in a sensitive part of Arklow from an archaeological and architectural heritage aspect. These opportunity sites would benefit from the overlaying of mapping to show the extent of the Arklow Town Area, the area of Archaeological Potential of Significance and the recorded Protected Structures on or in the vicinity of both opportunity sites.

Observation 1 – Built Heritage

Having regard to the provisions for the protection of built heritage, and in particular to:

- **NPO 89 of the NPF (protect, conserve and enhance natural, cultural and built heritage); and**
- **NPO 90 of the NPF (enhance, integrate and protect built heritage assets),**

the Office advises that the Planning Authority amends section B:1.4 relating to opportunity sites to:

- overlay the map of the Extent of Arklow Town Area of Archaeological Potential of Significance on the opportunity sites mapping; and**
- indicate the recorded Protected Structures (those identified on the Record of Protected Structures (RPS)) at these locations.**

Chief Executive Response

LPF Map No. 2A (Built Heritage) identifies Areas of Archaeological Potential or Significance, National Monuments and properties on the Record of Protected Structure in Arklow. Within the Arklow LPF written statement itself, Figure B:7.1 is a map illustrating the extent of the Arklow Town Area of Archaeological Potential or Significance. It covers a large area of the town centre, beyond the boundaries of specific Opportunity Sites.

The figures contained in B:1.4 comprise the Opportunity Site boundaries map or Concept Plan map that illustrates the potential form of future development. They do not identify the various constraints and opportunities that apply to the sites.

Given that the Arklow LPF clearly identifies the various heritage assets across the town, including both the area of archaeological sensitivity and the Record of Protected Structures it is not considered necessary to overlay these features onto the Opportunity Site maps; to do so would result in duplication and provide unnecessary complexity on these illustrations. However, it is appropriate to highlight where there are heritage designations affecting the two Opportunity Sites. Therefore, it is recommended that appropriate wording be added to the text in these sections.

Chief Executive Recommendation

Update Section B:1.4 to add the following text:

Objectives OP1 'The Alps'

- The topographical challenges of this site area recognised. Proposals shall carefully balance the challenges of this site with its highly accessible town centre location whilst been sensitive to its immediate built and natural context, including Protected Structure (A39 – Former Ormonde Cinema) and the Ormonde Castle National Monument (WI040-029002-Castle - Anglo-Norman masonry castle), and its location within an area of Archaeological Significance or Potential (Arklow Town). Proposals shall demonstrate how they accord with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.

Objectives OP2 'Main Street'

- Any new scheme should seek to protect the character and appearance of the traditional shop fronts including the Morgan Doyle facade and canopy and any architectural details on buildings of high architectural value wherever possible. **Development shall take account of the site's location within an Area of Archaeological Significance or Potential (Arklow Town) and appropriately protect any heritage assets.**

Item 7 Summary

The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Chief Executive Response

Noted – the above CE Responses and Recommendations have considered the OPR submission in full.

4.1.2 National Transport Authority

No.	Link to submission
42	National Transport Authority

Item 1 Overview and Policy Context

From a review of the Draft LPF and associated Draft Local Transport Plan (LTP), it is considered that the Plan is generally consistent with the Transport Strategy, as required by the Planning and Development Act 2000 (as amended), subject to the observations and recommendations set out in this report. These observations and recommendations are based on the following policy and guidance documentation, as well as the primary provisions of the Wicklow County Development Plan 2022 – 2028 (hereafter Wicklow CPD).

National Investment Framework for Transport in Ireland (NIFTI)

This is the strategic framework for future investment decision making in land transport. It guides transport investment in the years ahead to enable the National Planning Framework, support the Climate Action Plan, and promote positive social, environmental and economic outcomes throughout Ireland.

NIFTI sets out the road user modal hierarchy in Ireland as; 1. Active Travel (Walking & Cycling); 2. Public Transport; 3. Private Vehicles.

NIFTI also outlines an intervention hierarchy which is: 1.Maintain; 2.Optimise; 3.Improve; 4.New.

National Sustainable Mobility Policy

This sets out a strategic framework to 2030 for active travel and public transport to support Ireland’s overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.

Climate Action Plan 2025

Under the Climate Action and Low Carbon Development (Amendment) Act 2021, emissions must reduce by 51% by 2030, setting a path towards a zero net-emissions scenario by 2050. The transport sector is committed to meeting those targets in full. For transport, there are three main actions required that should inform the policies, objectives and measures of the Local Area Plan, namely:

- Reducing the demand for travel;
- Increasing use of public transport, walking and cycling and a reduction in trips by car;
- Conversion of the transport fleet to zero emissions vehicles

National Planning Framework (NPF)

The National Planning Framework sets out the National Policy Objectives (NPO) which align with the National Development Plan (NDP) through delivery of National Strategic Outcomes (NSO).

Eastern & Midland Regional Assembly – Regional Spatial & Economic Strategy

The RSES provides a high-level development framework for the Eastern and Midland Region that supports the implementation of the NPF.

Greater Dublin Area Transport Strategy 2022 – 2042

The Transport Strategy sets out a framework for the delivery of transport infrastructure and services in the GDA region as well as key policy objectives that support the integration of land use and transport planning at a local level.

As part of the Transport Strategy, the M11 corridor is designated as a ‘Regional Bus Corridor’, with ancillary objectives to provide for park and ride facilities along this route.

Chief Executive Response

Noted

Item 2 Phasing of Local Transport Plan Interventions

The NTA welcomes the publication of the Draft LTP alongside the Draft LPF and supports the range of measures and interventions that are identified to meet the objectives of the plan. It is, however, submitted that further consideration should be given to the phasing of the identified interventions and that a more detailed indicative phasing plan of transport interventions for the town should be prepared. Interventions should be phased based on a consideration of their priority, deliverability and how the respective intervention contributes to the delivery of the wider sustainable transport network.

At present, whilst some information is provided with regards to phasing in Table 19-1, it is primarily given at the 'measure' level and not the 'intervention' level. Given potential future funding constraints, more considered phasing at the intervention (i.e. project or scheme) level would be of benefit to the local authority and funding agencies such as the NTA.

NTA Recommendation

- **Provide a more detailed implementation plan in the LTP with an indication of potential phasing of the identified 'interventions'.**

Chief Executive Response

The NTA's support for the draft LPF and draft LTP is noted and welcomed.

Both the LTP and LPF identify a series of Active Travel Projects. These are identified on LPF Map No. 6 (Active Travel Strategy). Point No. 10 in the LPF's 'Overall Strategy' outlines six priority transport / accessibility scheme in Arklow including active travel routes/connections, improvements to the public realm/footpaths/cycleways, and the Southern Port Access Road. Within the LTP, Table 19-1 of the LTP outlines short term (up to 2028), medium term (up to 2031) and long term (up to 2042) objectives for each of the LTP's recommended measures.

Nevertheless, the CE agrees that it would be worthwhile updating Table 19-1 to instead identify specific interventions recommended within the LTP and the proposed timeframes for delivery. The Local Transport Plan will be reviewed and updated in due course, as the LPF progresses taking into account any Proposed Material Alterations.

Chief Executive Recommendation

Proposed Alteration:

Local Transport Plan, Chapter 19 (Implementation and Outcomes):

Update Table 19-1 (Implementation Table) to identify potential timelines for the implementation of the recommended projects in the Local Travel Plan.

Item 3 Integration between Local Transport Plan and Local Planning Framework

The inclusion of local transport plan measures and interventions as part of objectives in the Draft LPF is welcomed by the NTA given the importance of these LTP elements in supporting the wider objectives of the LPF and the proper planning and sustainable development of Arklow. It is considered that the level of integration between the two documents could be further strengthened through the incorporation of additional LTP measures as LPF objectives. The NTA would, in particular, recommend the inclusion of Parking Measures PK3 and PK4 of the LTP as objectives of the LPF given that the implementation of identified town centre public realm and active travel interventions will likely depend heavily on how existing parking and servicing arrangements can be improved.

The NTA also submit that careful consideration should be given to the terminology used in the LTP to identify 'recommendations', 'measures' and 'interventions' and to ensure the use of these terms are consistent across the various LTP sections and associated tables. Additionally, in the integration of these elements with the LPF, it is considered that the Local Authority should ensure consistency to avoid any ambiguity with regards to the proposed implementation of LTP/LPF elements.

NTA Recommendation

- **Ensure there is a greater level of integration of the measures of the LTP with the LPF, including Parking Measures PK3 and PK4 of the LTP, which are not currently referenced in the LPF.**
- **Ensure there is a consistency between the terminology that is used for 'recommendations', 'measures', 'interventions' and other LTP elements across the document.**

Chief Executive Response

The CE recognises the need for land use planning and transport planning to be fully integrated. As per the NTA's guidance, the preparation of the LTP formed part of the LPF process and its recommended land use measures and projects have been directly incorporated into the LPF policy objectives.

It is important however, to recognise the distinction between the two documents. The LPF is a land use framework for Arklow, while the Local Transport Plan (LTP) is a transport framework for the town. The two documents have different remits and applications, and apply over different timescales (LPF up to 2031, the LTA up to 2040). Any LTP measures included as objectives in the LPF should be appropriate for, and specific to, its remit as a land use framework for Arklow. Some of the measures and projects within the LTP are more appropriate for WCC's project delivery teams, such as the Roads Department or the Arklow Municipal District. This is why there is a distinction between the terminologies used within the plans: the LTP has recommended 'Measures' whilst the LPF has policy 'objectives'.

Accordingly, specific policy objectives have been incorporated within the LPF's policy objectives where appropriate for a land use planning framework, e.g. Southern Port Access Road (ARK82) and the Templeraíne Park and Ride at Junction 20 of the M11 (ARK79). Nevertheless, the CE agrees that the LPF should more clearly support the implementation of the LTP in its entirety, and so it is recommended that a new objective be included in Part B:8 (Physical Infrastructure) of the LPF providing policy support for the recommended measures in the LTP.

It is also proposed to include a new objective in Part B:8 of the LPF for the optimisation and management of off-street and on-street car parking in the town centre, which will ensure that the recommendations within LTP Measures PK3 (Car Parking Management Strategy) and PK4 (On-Street Car Parking Approach) are effectively supported. PK3 is scheduled to be implemented in the short term (up to 2028) and PK4 is scheduled to be implemented on an on-going bases.

As noted above, it is separately recommended that Table 19-1 (Implementation Table) of the Local Transport Plan to identify potential timelines for the implementation of the recommended projects in the Local Transport Plan.

Chief Executive Recommendation

Alter the LPF as follows:

Section B:8 Physical Infrastructure

Add new objectives

- ARK-XX** To support and promote the implementation of the recommended measures set out in the Local Transport Plan
- ARK-XX** To support the development and optimisation of off-street car-parking facilities in or adjacent to the town centre so that on-street, all-day parking can be relocated. On-street spaces shall be managed and repurposed where feasible to favour set-down/drop-off areas, short-stay visitor parking and active loading rather than long-stay parking..

Item 4 Cycle Design Manual

Furthermore, the NTA would request that further reference is provided in the LTP, and where appropriate, the LPF, to the Cycle Design Manual, in particular for Measures CY2, CY3 and WK2.

NTA Recommendation

- **Include further reference to the Cycle Design Manual, particularly for Measures CY2, CY3 and WK2.**

Chief Executive Response

The NTA has recommended that the LTP and LPF are updated to include reference to the Cycle Design Manual. Appendix 1 of the CDP (Development & Design Standards) notes that the objectives and standards should be read in conjunction with other guidance and documents, including the National Cycle Manual (2011). The Cycle Design Manual was published subsequently in 2023, and so is not specifically cited in the CDP; however, CDP Appendix 1 states that, in regard to its list of wider guidance:

"The above list is not exhaustive or definitive, any guidelines updated or new guidelines produced during the currently of the plan will be utilised in the assessment of applications."

In addition, the following CDP objectives, which address *Design Manual for Urban Roads and Streets* and the *Cycle Design Manual* will apply directly in the LPF area:

CPO 12.12 *To require all new or improved roads to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure having regard to the guidance set out in the National Cycle Manual and DMURS) and public lighting as deemed appropriate by the Local Authority.*

CPO 12.30 *Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG) and the 'Traffic & Transport Assessment Guidelines' (TII).*

CPO 12.31 *Road Safety Audits, Road Safety Impact Assessments, Street Design Audits as per DMURS, or Accessibility Audits shall be required at the discretion of the Planning Authority, but shall generally be required where new road construction or a permanent change to the existing road / street layout is proposed.*

CPO 12.33 *To require all new or improved roads (of all designations) to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure (having regard to the guidance set out in the National Cycle Manual and DMURS), public lighting and bus stop facilities as deemed appropriate by the Local Authority.*

CPO 12.34 *The design of new roads or improvements to existing local roads and new means of access onto roads shall generally comply with the guidance set out in the 'Design Manual for Roads & Bridges' DMRB (TII), the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG), the 'Traffic Management Guidelines' (DoTDoELG-DTO) and 'Recommendations for Site Development Works for Housing Areas' (DoELG) as appropriate as may be amended and revised, unless local conditions determine otherwise.*

Accordingly, it is not considered necessary to update the LTP or LPF to include reference to the Cycle Design Manual. The CDP already ensure that it, and other guidance, is taken into account as part of the development management process.

Chief Executive Recommendation

No change to Proposed Variation / draft LPF.

4.1.3 Environmental Protection Agency

No.	Link to submission
5	Environmental Protection Agency
Please also see Section 4.2.13 of this report, which addresses all SEA related submissions.	

Item 1 Preamble

In our role as an SEA environmental authority under the SEA Regulations, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Variation and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the Variation. Our functions do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via the attached guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*'.

This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Variation.

Wicklow County Council should also ensure that the Variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

Chief Executive Response

Please see **Section 4.2.13** of this report, which addresses all SEA related submissions.

Item 2 Content of the Environmental Report

The SEA Regulations set out the information to be contained in an Environmental Report.

Mitigation Measures

Where the potential for likely significant effects have been identified, appropriate mitigation measures to avoid or minimise these should be provided. The Variation should also include clear commitments to implement the mitigation measures.

We note that a commitment is made to facilitate coastal defence protection and defence works being carried out (reference ARK80 p111 of the SEA ER). There is merit in clarifying whether a specific plan is proposed to coordinate these activities and whether the requirements of the SEA and Habitats Directives in particular have been (or will be) taken into account in this regard.

Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.

Given that a previous iterations of the Wicklow County Development Plan exist, providing information on the outputs of the previous monitoring programme would be useful to consider. This would help inform how effective the existing monitoring programme has been, and how it can be improved or further developed.

If the monitoring identifies adverse impacts during the implementation of the Variation, Wicklow County Council should ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>

Ireland's State of the Environment Report 2024

In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered, and relevant aspects integrated as appropriate, in implementing the Variation outputs/ recommendations. It is available at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/state-of-environment-report/>.

Future Amendments to the Variation

You should screen any future amendments to the Variation for likely significant effects.

Chief Executive Response

Please see Section 4.2. 13 of this report, which addresses all SEA related submissions.

Mitigation Measures

Appropriate mitigation measures have been integrated into the Proposed Variation / Arklow LPF.

With regard to coastal defence protection, the commitment to facilitate coastal defence protection and defence works is contained within Objective ARK 84 of the LPF. The CE can confirm that a Coastal Erosion Risk Management study for the section of the Arklow coastline from Seabank to Kilmichael Point has been commissioned by WCC, in collaboration with the OPW. The next stage will be to outline options for solutions to the coastal erosion in this area. This will include an analysis of the existing rock revetements North and South of Arklow.

Any specific plans brought forward as a result of this study will be subject to the development management process, including assessment under the EIA and Habitats Directives.

Monitoring

Noted. Section 9 of the SEA Environmental Report outlines the monitoring measures that will be taken as part of the implementation of the Proposed Variation / Arklow LPF.

Ireland's State of the Environment Report 2024

The SEA Environmental Report already takes account of the 2024 version of this report.

Future Amendments to the Variation

Noted. Further amendments to the Proposed Variation will be screened for SEA.

Chief Executive Recommendations

Further alterations to the Proposed Variation will be screened for SEA.

Item 3 SEA Statement – "Information on the Decision"

Once the Variation is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Variation;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation;
- The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and,

- The measures decided upon to monitor the significant environmental effects of implementation of the Variation.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/publications/monitoring--assessment/assessment/strategic-environmental-assessment/06695-EPA-SEA-Statements-and-Monitoring-Report.pdf>.

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Climate, Energy and the Environment; and,
- Minister for Agriculture, Food, and the Marine.
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

Chief Executive Response

Noted

4.1.4 Transport Infrastructure Ireland

No.	Link to submission
7	Transport Infrastructure Ireland

Item 1 Preamble

Transport Infrastructure Ireland's (TII) mission is to deliver transport infrastructure and services, which contribute to the quality of life for the people of Ireland and support the country's economic growth. TII safeguards the strategic function of national roads to promote the safe and efficient operation of the national road networks.

TII's observations to seek to address the safety, capacity and strategic function of the national road network in accordance with TII's statutory functions and the provisions of official policy set out in *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012). The maintenance and protection of the strategic function of the national road network including junctions, is indicated in the transport strategy of the Eastern & Midland *Regional Spatial and Economic Strategy* (RSES) at Regional Policy Objective (RPO) 8.1; the NTA *Greater Dublin Area Transport Strategy 2022-2042* at *Measure ROAD2*; and *National Road Objectives* of the County Development Plan at County Plan Objective (CPO) 12.40 which expressly recognises *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012).

The Draft Arklow Local Planning Framework (LPF) western boundary is majority demarcated by the M11, concurrent with M11 Junction 20 (Arklow North) and adjacent Junction 21 (Arklow South). The M/N11 corridor is identified as part of the TEN-T Comprehensive Network and critical for access to Rosslare Europort. TII made a submission to the Pre-Draft stage for the Arklow & Environs LAP in March 2024 (and provided invited feedback to the *Draft Arklow and Environs Local Transport Plan* (LTP), in June 2025). TII observes an updated version of a draft LTP (Rev 07, dated 16.09.2025) forms Appendix 3 of the Draft LPF.

Taking account of the above policy and locational matters with the protection of the maintenance of the safe and efficient operation of the national road network for the delivery of the Draft LPF objectives, TII makes the following observations and recommendations for the Council's consideration:

Chief Executive Response

Noted

Item 2 TII Recommendation no. 1

TII Recommendation no. 1: Revision of draft LPF proposed Road Objective ARK 81

TII welcomes Draft LPF specific objective "ARK 81 To protect the strategic function of the N11/M11 in accordance with the *Spatial Planning and National Roads Guidelines* (DoHLGH 2012) and in compliance with TII Publications."

TII would highlight that the implementation of other specific objectives included in the draft LPF or "interventions" in the accompanying draft LTP will require observance of official national roads policy and demonstration of compliance with TII Publications (Technical & Standards). TII consider that this requirement is not clearly captured in the draft LPF or the accompanying draft LTP. It is advised that greater clarity is required to ensure that full implications of implementation of the specific objectives are understood and achievable. This matter is especially critical with respect to design, costs and delivery.

TII reminds the Council that *TII Publications (Technical and Standards)*, available at www.tiipublications.ie, define the requirements that support official national road policy, administrative and technical procedures developed by TII to govern activities with respect to the National Road Network. For the avoidance of doubt, TII Publications replaced the previous National Roads Design Manual for Roads and Bridges (DMRB) in 2016.

The Council will be aware that Government's *NGS Circular No. 2 of 2022 re. Application of Guidelines and Standards in relation to works on Public Roads in Ireland*, states that

- (i) *"The design, construction and maintenance of rural roads and roads with a speed limit or proposed speed limit of greater than 60km/h shall be in accordance with TII Publications (Standards and Technical Documents)."*
- (ii) *"Urban roads and streets (roads with speed limits of 60 km/h or less) shall be designed in accordance with the Design Manual for Urban Roads and Streets (DMURS)." DMURS Section 1.3 "Application of this Manual" requires TII Publications standards apply to national roads and / or roads with extra urban speed.*

Having regard to the proposed draft LTP "*interventions*", (also recorded in the draft LTP as "*recommendations*") TII advises that TII Publication (Technical & Standards) compliance shall apply to those interventions that interact with the national road network by e.g. installation or upgrading of cycle and pedestrian facilities on roads or routes that crossing over or under the M11 and / or by physical proximity to the motorway which includes its interchanges and associated ancillary infrastructure, including drainage.

At this preliminary stage, TII offers an illustrative example of TII Publication compliance requirements for draft LPF interventions using draft LPF *Map 6 Active Travel Strategy*. TII has prepared Table 1 in Appendix 1 of this submission, that identifies 5 no. interventions on *Map 6 Active Travel Strategy* which will engage TII Publication compliance by reason of interacting with TII Structures.

Development proposals which impact TII Structures must be subject to co-ordination with, and the prior approval of TII in accordance with the procedures specified in TII Publication *DN-STR-03001 - Technical Acceptance of Road Structures on Motorways and Other National Roads*. This Standard specifies the procedures to be followed, in order to obtain Technical Acceptance for structures on motorway and other national road schemes and for the submission of as built records.

In addition, TII notes other proposed interventions indicated on draft LPF maps 5 and 6 that will also possibly engage TII Publications compliance requirements by virtue of the interventions' proximity with the M11 e.g.

- Templeraíne Park and Ride in the immediate vicinity of M11 Junction 20;
- PY 23 described at Table 13-1 of the draft LTP as "New N-S 2km active travel link from Knockmore to Ballyraíne Car Park" running immediately adjacent the M11;
- AT 25 described at Table 10-1 of the draft LTP as "Rock Big towards Courtown (Wexford)" to "Support the delivery of an Inter-Urban Cycling route as identified in the GDA Cycle Network Plan southwards to Courtown (Wexford)".

TII Publications will generally require the preparation, submission and approval of design information ahead of the seeking development consent or undertaking exempted development works that interact with the national roads network for each proposed intervention. In the absence of demonstration of compliance with applicable TII Publications, there is a risk that changes to intended implementation of interventions may be necessary as a result of TII Publications requirements that may involve delay and additional costs to the implementation of individual interventions.

Please be advised that any future costs of works arising from the implementation of the draft LTP interventions that impact the national road network will generally be a matter for the Council and / or private developers.

TII recommends:

Review of TII Publications (Standards and Technical) requirements in the implementation of the indicated proposed draft LPF / LTP "*interventions*" / "*recommendations*" to ensure compatible deliverability.

Chief Executive Response

Wicklow County Council is aware of its obligations with respect to national roads policy, the various TII publications, standards and expectations as outlined in this submission, particularly with respect to the design of new schemes that may be identified in the LTP / LPF and the consultation process with the TII.

This draft LPF has been prepared to be consistent with the Wicklow County Development Plan, including all strategies, principles, policies and objectives contained therein, and so it is not considered necessary to re-state all of the County principles / strategies / policies / objectives in the LPF itself.

In particular, the County Development Plan includes the following objectives with respect to national roads that will apply directly in the LPF area:

CPO 12.37 *To ensure that the N/M11 and N81 route improvement corridors as defined by TII are protected from inappropriate development and ensure that no development is permitted which would interfere with route options identified (as shown on Map 12.01).*

CPO 12.38 *To co-operate with TII in the upgrade of existing interchanges on the National Routes and where appropriate and necessary, to restrict development immediately adjacent to interchanges to provide for the future enlargement of interchanges.*

CPO 12.40 *To safeguard the capacity and safety of the National Road network by restricting further access onto National Primary and National Secondary roads in line with the provisions of the 'Spatial Planning and National Roads' Guidelines' (DoECLG 2012). In particular, a new means of access onto a national road shall adhere to the following:*

- a. *Lands adjoining National Roads to which speed limits greater than 60kmh apply: The creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply shall generally be avoided. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.*
- b. *Transitional Zones: These are areas where sections of national roads form the approaches to or exit from urban centres that are subject to a speed limit of 60kmh before a lower 50kmh limit is encountered. Direct access onto such road may be allowed in limited circumstances, in order to facilitate orderly urban development. Any such proposal must, however, be subject to a road safety audit carried out in accordance with the TII's requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, shall be avoided.*
- c. *Lands adjoining National Roads within 50kmh speed limits: Access to national roads will be considered by the Planning Authority in accordance with normal road safety, traffic management and urban design criteria for built up areas.*

CPO 12.41 *To ensure that all new developments in proximity to National Routes provide suitable protection against traffic noise in compliance with S.I No. 140 of 2006 Environmental Noise Regulations and any subsequent amendments to these regulations.*

CPO 12.42 *To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.*

It is therefore not considered necessary to include further reference to TII Publications (Standards and Technical) in the LPF to ensure compatible delivery.

Chief Executive Response

No change to draft Arklow LPF/Variation.

Item 3 TII recommendation no. 2

TII recommendation no. 2 revision of draft LPF Specific Local Objective (SLO) 5 Kilbride objectives to include cognisance of M11 and national road network official policy and technical compliance requirements

Having regard to the matters currently highlighted as "objectives" amongst the draft LPF "SLO 5 Kilbride objectives", TII is not satisfied that the maintenance of the safe and efficient operation of the national road network has been identified appropriately amongst those proposed objectives for this area that part bounds the M11.

Development immediately adjacent or otherwise interacting with the national roads network is required to observe the *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012). TII reminds the Council, that the design and technical standards of TII Publications instead of, or in addition to DMURS, will apply to measures that interact with the national road network.

Having regard to proposed draft SLO 5 adjacent to the M11, TII considers that there is potential that development works may arise that will directly and or indirectly interact with the national road network and associated infrastructure. The national road infrastructure includes its interchanges and associated underground and overground infrastructure and assets such as structures and drainage. It is critical that development of this area has regard to the requirement for compliance with TII Publications (Technical & Standards) which, in accordance with TII Publications (Standards) such as TII technical acceptance procedures. As noted above, TII acceptance procedures must be preceded by the preparation and submission, by or on behalf of the local roads' authority, of design reports ahead of seeking of development consent or implementation of works that are exempt from the requirement to seek planning permission.

TII Publications exist in the interests of ensuring appropriate standards apply to national roads in the interests of ensuring level of service including the assessment and identification of measures for the safety of all road users and the public in general.

TII recommends that:

The addition of the following point to be added to SLO 5 Kilbride Objectives on Page 116 of the proposed variation to have regard to the Section 28 *Spatial Planning and National Roads Guidelines for Planning Authorities* (DoECLG, 2012) and TII Publications compliance requirements:

"Development within this SLO shall address Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and TII Publications requirements associated with proximity the M11 infrastructure "

Chief Executive Response

As outlined above, this draft LPF has been prepared to be consistent with the CDP, including all strategies, principles, policies and objectives contained therein. In addition, this LPF sits under the CDP in the hierarchy of plans, and therefore the provisions of the CDP apply directly in the LPF area, and as set out in the draft LPF, it is not considered necessary to re-state all of the County principles / strategies / policies / objectives in the LPF itself.

In particular, the CDP includes the following objectives with respect to national roads that will apply directly in the LPF area:

CPO 12.37 *To ensure that the N/M11 and N81 route improvement corridors as defined by TII are protected from inappropriate development and ensure that no development is permitted which would interfere with route options identified (as shown on Map 12.01).*

CPO 12.38 *To co-operate with TII in the upgrade of existing interchanges on the National Routes and where appropriate and necessary, to restrict development immediately adjacent to interchanges to provide for the future enlargement of interchanges.*

CPO 12.40 *To safeguard the capacity and safety of the National Road network by restricting further access onto National Primary and National Secondary roads in line with the provisions of the 'Spatial Planning and National Roads' Guidelines' (DoECLG 2012). In particular, a new means of access onto a national road shall adhere to the following:*

- a. *Lands adjoining National Roads to which speed limits greater than 60kmh apply: The creation of any additional access point from new development or the generation of increased traffic from existing accesses to national roads to which speed limits greater than 60kmh apply shall generally be avoided. This provision applies to all categories of development, including individual houses in rural areas, regardless of the housing circumstances of the applicant.*
- b. *Transitional Zones: These are areas where sections of national roads form the approaches to or exit from urban centres that are subject to a speed limit of 60kmh before a lower 50kmh limit is encountered. Direct access onto such road may be allowed in limited circumstances, in order to facilitate orderly urban development. Any such proposal must, however, be subject to a road safety audit carried out in accordance with the TII's requirements and a proliferation of such entrances, which would lead to a diminution in the role of such zones, shall be avoided.*
- c. *Lands adjoining National Roads within 50kmh speed limits: Access to national roads will be considered by the Planning Authority in accordance with normal road safety, traffic management and urban design criteria for built up areas.*

CPO 12.41 *To ensure that all new developments in proximity to National Routes provide suitable protection against traffic noise in compliance with S.I No. 140 of 2006 Environmental Noise Regulations and any subsequent amendments to these regulations.*

CPO 12.42 *To protect the carrying capacity, operational efficiency and safety of the national road network and associated junctions, significant applications either in the vicinity of or remote from the national road network and associated junctions, that would have an impact on the national route, must critically assess the capacity of the relevant junction. If there is insufficient spare capacity to accommodate the increased traffic movements generated by that development taken in conjunction with other developments with planning permission that have not been fully developed, or if such combined movements impact on road safety, then such applications must include proposals to mitigate these impacts.*

It is therefore considered that the provision of additional support to national and TII publications is not essential, but the CE has no objection to the inclusion of additional wording. It is considered that such policy support should apply to the entire LPF area, rather than just to SLO 5, and so it is proposed to include a new general policy objective in Section B:8 (Physical Infrastructure).

Chief Executive Recommendation

Alter the LPF as follows:

Section B:8 Physical Infrastructure

Add new objective

ARK-XX To protect the strategic function of the N/M11 in accordance with Spatial Planning and National Roads Guidelines for Planning Authorities (DoECLG, 2012) and in compliance with TII Publications.

Item 4 TII additional commentary and observation

TII would highlight that there are issues with respect to different terminology use between the LPF and LTP. TII considers that in the interests of interpretation and clarity that these editorial issues should be addressed.

To illustrate TII would refer to draft LPF outcomes identified as "*interventions*" a.k.a. "*recommendations*" of the LTP. However, these *interventions* / "*recommendations*" are identified as having matching "*measures*" in the draft LTP. TII advise that the draft LTP "*measures*" read and operate as matters to be observed as part of the implementation of the proposed interventions. However, the draft LPF does not appear to contain a dedicated specific objective stating all of the "*interventions*" (a.k.a. "*recommendations*") of the LPF are proposed to be adopted by the draft LPF.

Where it is the Council's intention that all of the draft LTP measures are to be adopted as part of the draft LPF, TII would recommends that this intention is clearly stated as a specific objective of sub-part B.8. TII further recommends that the draft LPF "*interventions*" / "*recommendations*" be clearly identified as observing accompanying draft LPF "*measures*" in the interests of orderly, compliant implementation of the proposed "*interventions*" / "*recommendations*".

Chief Executive Response

The CE has responded to this comment in detail in the response to the submissions of both the Office of the Planning Regulator and the National Transport Authority (see above). In summary, given that the LTP will have a wider use beyond informing the land use framework, it is considered appropriate to retain the distinctions between the LTP and the LPF, and terminologies used within them.

Nevertheless, the CE agrees that the LPF should more clearly support the implementation of the LTP in its entirety, and so it is recommended that a new objective be included in Part B:8 (Physical Infrastructure) of the LPF providing policy support for the recommended measures in the LTP.

Chief Executive Recommendation

Alter the LPF as follows:

Section B:8 Physical Infrastructure

Add new objective

ARK-XX To support and promote the implementation of the recommended measures set out in the Local Transport Plan

Item 5 Conclusion

This submission is made in accordance with government policy to maintain and protect the safety and efficiency of strategic national road network complementary to development objectives of the draft Arklow LPF.

TII reminds the Council that the implementation of all national road schemes / improvements / maintenance is subject to budgetary constraints and to prioritisation and adequacy of the funding resource available to the Authority. In these circumstances and taking account of the Exchequer financial position and levels of funding available to the Authority, the relative priority or timeframe for national road schemes may be subject to alteration. TII reiterates that having regard to budget allocations, that there are currently no national roads schemes proposed in the vicinity of the Draft LPF area at this time.

Chief Executive Response

Noted

4.1.5 EirGrid

No.	Link to submission
12	EirGrid

Item 1 EirGrid Context
<p>EirGrid welcomes and acknowledges the undertaking to produce the Draft Arklow Local Planning Framework 2025/Proposed Variation No. 5.</p> <p>EirGrid Context</p> <p>EirGrid as Transmission System Operator (TSO) develops, manages and operates the transmission grid in Ireland. The grid transports power from where it is generated to where it is needed. EirGrid is also leading the secure transition of the electricity grid to a sustainable low-carbon future. The grid brings power to industry and businesses that use electricity. It also powers the distribution network, owned and operated by ESB Networks, which supplies the electricity used in homes, businesses, schools, hospitals and farms. EirGrid balances supply and demand every minute of the day, while also planning for Ireland’s long-term electricity needs.</p> <p>To prepare for and facilitate future development throughout Ireland, EirGrid must make the electricity grid more resilient and increase flexibility. The grid will need to carry more power and EirGrid will need to upgrade and add to existing grid infrastructure – primarily comprising underground cables and overhead lines and substations.</p> <p>The European Communities (Internal Market in Electricity) Regulations 2000 (SI 445 of 2000) sets out the role and responsibilities of the TSO; Article 8(1) (a) gives EirGrid, as TSO, the exclusive function: <i>“To operate and ensure the maintenance of and, if necessary, develop a safe, secure, reliable, economical and efficient electricity transmission system, and to explore and develop opportunities for interconnection of its system with other systems, in all cases with a view to ensuring that all reasonable demands for electricity are met having due regard for the environment.”</i> It is in this statutory context that EirGrid is undertaking the planning and development of grid infrastructure in the Eastern and Midland Region.</p> <p>The EirGrid <i>Strategic Framework for Grid Development in the Eastern & Midlands Region</i>¹ provides a programme of grid development within the region. Powering Up Wicklow, a critical programme of works will strengthen key electricity infrastructure in Wicklow and the surrounding areas, helping to make Ireland ‘renewable ready’ and provide a consistent and reliable supply of electricity for Wicklow.</p> <p>Arklow 220/110 kV Station is a high critical transmission station and an important node along the south-east coastal corridor. The station is nearing end of life and requires redevelopment; originally commissioned in stages from late 1960s to early 1980s. In addition, it requires expansion as it has insufficient capacity for known future connection needs.</p>
<p>Chief Executive Response</p> <p>Noted</p>

Item 2 Submission Context
<p><i>Arklow Physical Infrastructure Objectives, Energy & Electricity Objectives:</i></p> <p><i>ARK 87 To support Eirgrid with the implementation of their Powering up Wicklow programme and facilitate the expansion and upgrading of electricity supply infrastructure serving the LPF and wider area</i></p> <p><i>ARK 88 To require that the development of Public Utility lands on the eastern side of the Dublin Road to facilitate the expansion of the existing electricity substation comprise of high quality design and boundary treatments, include planting and landscaping proposals to mitigate their visual impact having regard to their prominent location along the northern gateway entrance to Arklow Town.</i></p>

EirGrid welcomes Objectives ARK 87 and ARK 88, specifically the support for the Powering up Wicklow programme of works and the expansion of Arklow Substation.

Should you have any queries or require any additional information please do contact us.

Chief Executive Response

Noted.

It is noted that objective ARK 88 incorrectly references the wrong side of the Dublin Road. It is recommended to change this as follows

ARK 88 *To require that the development of Public Utility lands on the ~~eastern~~ western side of the Dublin Road to facilitate the expansion of the existing electricity substation comprise of high-quality design and boundary treatments, include planting and landscaping proposals to mitigate their visual impact having regard to their prominent location along the northern gateway entrance to Arklow Town.*

Chief Executive Recommendation

Alter the LPF as follows:

Section B:8 Physical Infrastructure

Alter objective ARK88

ARK 88 To require that the development of Public Utility lands on the ~~eastern~~ western side of the Dublin Road to facilitate the expansion of the existing electricity substation comprise of high-quality design and boundary treatments, include planting and landscaping proposals to mitigate their visual impact having regard to their prominent location along the northern gateway entrance to Arklow Town.

4.1.6 OPW Flood Risk Management

No.	Link to submission
19	OPW Flood Risk Management

Item 1 Preamble
<p>The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation No. 5 to the Wicklow County Development Plan 2022-2028 (re Arklow Local Planning Framework 2025).</p> <p>This submission is made specifically concerning flood risk management. Further submissions on the variation may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.</p> <p>The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA).</p>
Chief Executive Response
Noted

Item 2 Flood Zone Mapping						
<p>There are discrepancies between the flood zone mapping and the flood relief extents provided, with sections of Flood Zone A omitted from the Flood Zone Map. The 0.1% AEP flood extents for the flood relief scheme are not provided in the SFRA and could not be checked. Wicklow County Council should review to ensure the flood zones displayed are consistent with the datasets adopted.</p>						
<table border="1"> <tbody> <tr> <td data-bbox="309 1021 794 1498"> </td> <td data-bbox="801 1021 1289 1498"> </td> </tr> <tr> <td data-bbox="309 1507 794 1883"> </td> <td data-bbox="801 1507 1289 1883"> </td> </tr> <tr> <td data-bbox="309 1892 794 1966"> <p>Map No.4B Flood Risk - Present Day & Land Use Zoning</p> </td> <td data-bbox="801 1892 1289 1966"> <p>SFRA, Figure 2: Existing combined 1% AEP Fluvial and 0.5% AEP Coastal Flood Extent (Source: WCC & OPW, 2021)</p> </td> </tr> </tbody> </table>					<p>Map No.4B Flood Risk - Present Day & Land Use Zoning</p>	<p>SFRA, Figure 2: Existing combined 1% AEP Fluvial and 0.5% AEP Coastal Flood Extent (Source: WCC & OPW, 2021)</p>
<p>Map No.4B Flood Risk - Present Day & Land Use Zoning</p>	<p>SFRA, Figure 2: Existing combined 1% AEP Fluvial and 0.5% AEP Coastal Flood Extent (Source: WCC & OPW, 2021)</p>					

Chief Executive Response

Having reviewed the range of datasets included within the flood zone layers, and in light of the submission of the OPW, the CE has updated the relevant flood mapping. Those areas now additionally found to be within a flood zone have been addressed in Addendum 1 to the Strategic Flood Risk Assessment, which accompanies this report. Any recommendations arising from this report in relation to rezoning will similarly be assessed using these updated zones. For clarity, Figure 2 as set out in the SFRA illustrates the flood extent that the Arklow Flood Relief Scheme caters for, that being the area corresponding to Flood Zone A. The scheme is not designed to cater for greater flood extents/probability and therefore this is not shown. However, the CE has reviewed flood mapping for greater extents (i.e. Flood Zone B) and is satisfied that the correct datasets have been utilised, in light of the commentary above.

Chief Executive Recommendation

Update flood mapping in relation to the following:

- Strategic Flood Risk Assessment (see Addendum I)
- Map 4A Flood Risk – Present Day
- Map 4B Flood Risk – Present Day & Land Use Zoning

Item 3 Unmapped Watercourses

There are a number of watercourses with no flood zones. These are watercourses with a catchment area less than 5km² for inclusion in the National Indicative Fluvial Mapping Programme (NIFM), and therefore the OPW has not produced flood extents for these watercourses. The surrounding lands have been zoned *OS2 Open Space* to achieve a 25m riparian buffer zone, however as flood risk has not been considered in the land use zonings.

There are tributaries of the Avoca with no flood zones and similarly a 25m riparian buffer zone has been zoned *OS2 Open Space*. Flood risk in Arklow was not modelled as part of the National CFRAM programme, as it was part of a separate study for a flood relief scheme.

There are two areas zoned for *RN(1) New Residential Priority 1* and *RN(2) New Residential Priority 2* in the vicinity of these watercourses with other land use zonings being *TC Town Centre*, *E1 Employment* and *RE Existing Residential*. Wicklow County Council should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA.

An evaluation of site-specific flood risk assessments may also assist with establishing flood zones.



Chief Executive Response

The watercourses shown on the maps accompanying the Draft Arklow LPF are derived from Water Framework Directive watercourse mapping developed by the EPA. Watercourses of more significant capacity have been evaluated by the OPW and County Development Plan to determine flood risk zones. In some cases, smaller watercourses, and watercourses that have been culverted for significant periods of time and may not follow the exact path shown, do not have corresponding flood risk zones; however it is considered necessary to show these watercourses for completeness, and to allow for further assessment at development management stage, where necessary. The CE is generally satisfied that the riparian buffer applied under CPO 17.26 would mitigate against flood risk along watercourses that don't have associated flood risk zones identified. (As per OPW records of previous flood extents, there are no records of past flood events along the paths of watercourses that don't have associated flood risk zones identified).

It is not realistic for a Stage 3 flood risk assessment to be carried out for all smaller or culverted watercourses during the timeframes available during the LPF making process. This would be more appropriate to be carried out at the development management stage through the carrying out of site-specific flood risk assessments. While the CE is satisfied that the current wording of Objective ARK 85 would allow for the planning authority to request SSFRAs for sites with the above watercourses, the CE is amenable to adding clarity in this regard.

Chief Executive Recommendation

Alter the wording of Objective ARK 85 as follows:

'Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this LPF OR in Flood Zone C but within an area:

- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or
- that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to nearby watercourses that lack corresponding indicative flood zones;
- that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF;

shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.'

Item 4 Past Flood Events

A review of past flood events in the settlement areas should be undertaken. Past flood events reported to the OPW can be viewed on the webportal Floodinfo, however Wicklow County Council may also have other records. This could include listing the events, the source of the flooding, year of the event etc., assessing the location in relation to the flood risk extents, and noting in sequential approach assessments and justification tests that previous flood events have occurred.



Chief Executive Response

The SFRA has been prepared in line with the Flood Risk Guidelines. All past flood event records correspond with area identified as at risk of flooding in the flood maps prepared for the SFRA (noting the updates to flood mapping recommend above). It is further noted that the approximate point of 1986 flooding in Arklow Caravan Park does not precisely align with the extensive areas of flood zones shown in this area, however the level of flood risk in the caravan park would require an SSFRA in any application for development. WCC's record of flood events matches that provided by the OPW.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 5 Coastal Erosion

The Irish Coastal Protection Strategy Study produced 2050 Erosion Line mapping showing coastal areas potentially at risk of coastal erosion. These erosion maps have been produced for existing conditions only and do not include for projected future changes in climate such as sea level rise, increased storm frequency or associated variations in erosion rates.

The erosion hazard mapping is for strategic purposes, and minor or local features may not have been included in their preparation. Therefore, the maps should not be used to assess the erosion hazard and risk associated with individual properties or point locations, or to replace a detailed local erosion hazard and risk assessment. It was not possible to eliminate the effect of existing coastal defence structures from the erosion hazard and risk assessment. Consequently, there will be areas where no erosion line is shown that are at risk from erosion, should present defences fail or not be maintained in the future. Equally, there may be an erosion line shown in areas that are now adequately defended by coastal protection structures that were introduced during or after the assessment period.



Chief Executive Response

Noted. No specific request for alteration to the Draft LPF/ SFRA is made here. The CE wishes to draw attention to Objective ARK 84, which sets out the intention of the Local Authority to work with the OPW and any other relevant bodies to address the effects of sea level changes, coastal protection, coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 6 Consideration of Climate Change Impacts

The OPW welcomes the discussion on flood risk and climate change in the SFRA, and the inclusion of future scenario extents on the flood zone mapping. It is noted therein that while the increase in fluvial flood extent generally affects already developed areas, *"Where green field land is affected by future scenario flood mapping, the sites are generally large enough such that the development of desired uses may avoid development in the at risk area utilising the sequential approach in site planning. In some cases, zonings have been changed to more appropriate uses."*

Future scenario mapping for NIFM has been omitted from the future scenario mapping provided. Wicklow County Council should review and update accordingly.

The future scenario mapping demonstrates the potential increase in Flood Zone B extents only. It would also be useful to also show the potential increase in the Flood Zone A extents as development currently appropriate

in Flood Zone B may not be appropriate if located in Flood Zone A in the future and these developments may consider mitigation measures now that would ensure the development is resilient to any increases in flood risk.

Wicklow County Council should consider including discussion on how climate change has been considered in the flood relief scheme.

Chief Executive Response

The CE notes the commentary in relation to inclusion of National Indicative Fluvial Mapping in future scenario flood mapping and is amenable to the inclusion of this data and showing separate Flood Zones A & B on future scenario mapping. Addendum I to the Strategic Flood Risk Assessment, accompanying this report, makes reference to updated mapping in this regard. No zoning changes are considered necessary on the basis of this updated future flood risk mapping.

Design matters in relation to the permitted Arklow Flood Relief Scheme, including the consideration of climate change, is beyond the scope of the Proposed Variation – LPF. For reference, Chapter 6 of the EIAR submitted for the flood relief scheme includes a discussion of climate change adaptation. The flood relief scheme has been designed to allow for climate change adaptation to the flood defence elements, where walls and embankments can be increased in height in the future.

Chief Executive Recommendation

Update future scenario flood mapping to account for National Indicative Fluvial Mapping in relation to the following:

- Strategic Flood Risk Assessment (see Addendum I)
- Map 4C Flood Risk – Potential Future Scenario
- Map 4D Flood Risk – Potential Future Scenario & Land Use Zoning
- Map 4F Flood Risk – Potential Future Scenario & Land Use Zoning (CE Recommendations)

Item 7 Active Open Space

Objective ARK43, proposes the potential development of education uses on lands zoned *AOS Active Open Space*. The OPW welcomes the discussion in the SFRA in regard to this objective that the sequential approach will be applied in planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as *Open Space* will be permitted for the lands which are identified as being at risk of flooding. Wicklow County Council may consider transposing this into the Objective or Plan.

Chief Executive Response

The CE is amenable to altering Objective ARK43.

Chief Executive Recommendation

Alter Objective ARK43 as follows:

'Having regard to the potential longer term education needs in the Arklow area which have not been determined at this time but may arise; the physical and environmental constraints present in the area; and the space required particularly for new secondary schools, the development of new schools shall be permissible in principle in all land use zones in this LPF, other than OS1 and OS2, subject to the following criteria (in addition to all normal planning considerations) being fulfilled:

- In order to ensure an appropriate spatial distribution of schools throughout the LPF area and to ensure maximum accessibility of all residential areas to schools, no new primary school shall be located within a 10-minute walking time of any existing primary schools or no new secondary school shall be located within a 20-minute walking time of any existing secondary schools;
- The site has excellent public transport and active travel infrastructure in situ, or planned and committed to coincide with a new school opening at the site;
- No such development will be considered on lands in existing community use where the loss in the use / facility is not being made up for elsewhere within the settlement.
- **In relation to flood risk, the sequential approach shall be applied in site planning, to ensure no encroachment onto, or loss of flood plain. Only water compatible development such as Open Space will be permitted for lands which are identified as being at risk of flooding'**

Item 8 Justification Tests

The OPW welcomes the inclusion of plan making justification tests in the draft plan.

Part 3 of the Plan Making Justification Tests included in the SFRA notes in all cases that "*Assessment of flood risk has been incorporated into the Plan SEA Process*". Part 3 of the Plan Making Justification Test as set out in the Guidelines is that "*A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere*". This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should not be passed on to development management.

Wicklow County Council should identify the areas that will benefit from the flood relief scheme, highlight the residual risks which will remain and how these can be managed. For the areas which will not benefit from the scheme provide guidance on the structural or non-structural measures required prior to any future development.

In the test for CE Community and Education zoning, Wicklow County Council might clarify why the existing educational centre is considered to be a less vulnerable development, as generally this type of development would be classified as highly vulnerable.

Chief Executive Response

In relation to Strategic Environmental Assessment and the Plan-making Justification Tests, the accompanying SEA Environmental Report makes references to flood risk throughout. The definition of the 'Water' environmental component within that Environmental Report specifically refers to flood risk. Flood Risk has been considered in the evaluation of environmental impacts of LPF implementation, with the mitigation measures set out in the Environmental Report making multiple references to flood risk. These mitigation measures are set out in the Wicklow County Development Plan and have been transposed into the draft LPF/Variation as policy objectives, e.g. Objective ARK 85. The CE therefore considers that, alongside the SFRA, a flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the LPF/Variation preparation process, as indicated in the response to that question in each Justification Test.

In relation to the areas that will benefit from the flood relief scheme and residual risk, it is considered premature/not possible to identify these areas at this stage while detailed design for the flood scheme remains ongoing and the scheme is yet to be built. It is WCC's understanding that relevant flood mapping will be

updated by the OPW upon completion of the flood relief scheme, identifying residual areas of risk within the existing flood extents.

In relation to the justification test for the CE 'Community & Education' zoning in the Strategic Flood Risk assessment, assessment of this zone as being less vulnerable development was in error. Addendum I to the SFRA contains new justification tests as relevant for the CE zoning. These new justification tests did not require any changes in zoning.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 9 Sustainable Drainage Systems (SuDS)

The Guidelines recommend that the Strategic Flood Risk Assessment provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions. There are a number of lands with specific local objectives and large undeveloped land zonings where integrated and area based provision of SuDS and green infrastructure may be appropriate in this context.

Wicklow County Council should refer to the Guidance Document for Planners, Developers and Developer Agents 'Implementation of Urban Nature-based Solutions'.

Chief Executive Response

The Arklow SFRA sets out a schedule of 'mitigation objectives' in Section 5 of the SFRA, which includes the following County Development Plan objectives, which will apply in the LPF are:

CPO 14.11 *To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.*

CPO 14.12 *Excessive hard surfacing shall not be permitted for new, or extensions to, residential or commercial developments and all applications will be required to show that sustainable drainage techniques have been employed in the design of the development.*

CPO 14.13 *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SUDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SUDS design; Water Quality, Water Quantity, Amenity and Biodiversity.*

CPO 14.14 *Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SUDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.*

CPO 14.15 *To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.*

The LPF also contains **ARK 90**, which is a specific objective relating to SuDS, which specifically refers to the LAWPRO 2024 guidance on Nature-based solutions:

- *Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system; these systems shall be maintained properly in accordance with relevant standards to ensure their continue efficacy.*
- *Developments, including new/expanded developments and any planned improvements to existing urban spaces, shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024*

The Draft LPF/Variation was also accompanied by a Green Infrastructure Audit, which assessed existing and potential green infrastructure elements throughout the LPF area. Map No. 3 sets out a comprehensive 'Key Green Infrastructure' network throughout the LPF area.

Therefore, it is not considered necessary to re-state or insert these SuDS objectives into the specific local objectives or land use zoning.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 10 Restrictions on the Construction or Alteration of Bridges and Culverts

New bridge crossings are proposed in the Draft Plan. It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

Chief Executive Response

Noted. This would be a matter pertinent to any development application / consent procedure.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.7 The Maritime Area Regulatory Authority

No.	Link to submission
21	The Maritime Area Regulatory Authority

Item 1 Preamble
<p>The Maritime Area Regulatory Authority, or MARA, is a state agency that was established on 17th July 2023. MARA's functions, are set out under the Maritime Area Planning Act, 2021, and extend to the entire maritime area, from high water of ordinary tides to the outer limit of the continental shelf, encompassing the State's territorial seas and Exclusive Economic Zone. MARA facilitates a streamlined consenting process for projects in the maritime area and a route for projects to the planning system, by assessing applications for Maritime Area Consents (MACs) which are the right to occupy the seabed. MARA's functions in this new consenting system for the maritime area include the following;</p> <ul style="list-style-type: none"> • Assessing Maritime Area Consent (MAC) applications for the maritime area, which are required by developers before development permission can be sought; • Assessing Maritime Usage Licence (MUL) applications for specified activities; • Compliance and enforcement of MACs and MULs; • Investigations and prosecutions; • Administration of the existing Foreshore consent portfolio; • Fostering & promoting co-operation between regulators of the maritime area. • MARA is a body under the aegis of the Department of Climate, Energy and the Environment. <p>MARA notes a number of policies relating to river crossings and river related projects or activities which may require Maritime Usage Licences (MUL's) or maritime area consents (MACs), and early consultation with MARA would be encouraged to ascertain same.</p> <p>Maritime Usage Licence (MUL)</p> <p>The MAP Act requires MARA to licence marine usage activities as specified in Schedule 7 of the MAP Act, (not being a maritime usage which requires development permission).</p> <p>The following links to Maritime Area Consents, Maritime Usage Licences and Foreshore Act Consents may be of relevance for your consideration.</p> <p><i>[various links to policy documents were provide as part of the MARA submission]</i></p>
Chief Executive Response
Noted

Item 2 Coastal Planning Authority
<p>Having regard to the extent of the maritime area, the County Development Plan 2022-2028/Draft Arklow Local Planning Framework 2025 should be cognisant of the requirements of the Maritime Area Planning Act and the obligations of Wicklow County Council as a coastal planning authority. In this regard MARA would remind the coastal planning authority of the having regard to the objectives of the National Marine Planning Framework (NMPF) in the preparation of both the plan itself and the associated environmental assessments.</p> <p>MARA recommends that careful consideration be given to the obligation to have regard to the Marine Strategy Framework Directive (MSFD) also. At the core of the MSFD is the determination, achievement and maintenance of Good Environmental Status (GES) according to 11 qualitative condition descriptors. This forms the environmental pillar of maritime spatial planning under Directive 2014/89/EU (i.e. the MSP Directive). Ireland has established a total of 25 binding environmental targets and associated methodological standards that are at the forefront concerning progress towards GES achievement in the marine environment. These</p>

environmental targets established in 2020 represent Ireland's overarching and core policy statements on its marine environment under the MSFD. The Draft Arklow Local Planning Framework should be considered in the context of these GES descriptors and the associated Irish Marine Strategy environmental targets.

Chief Executive Response

Chapter 19 of the CDP considers Marine Spatial Planning and Coastal Zone Management and sets out multiple objectives to support the marine economy and operations, and protect the coastal and marine environment.

In particular, objective CPO 19.1 recognises both the National Marine Planning Framework and the Maritime Planning Act and confirms the CDP's consistency with them, whilst CPO 19.2 commits to working with the Department of Housing, Local Government and Heritage and other relevant government departments and bodies on marine planning.

Therefore the CDP, and the Arklow LPF are cognisant of the national legislation and planning policy obligations in relation to marine planning.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 3 MARA as a prescribed body

The Maritime Area Regulatory Authority (MARA) welcomes the opportunity to submit our views on planning applications within and directly adjacent to the maritime area. MARA is a prescribed body by virtue of Section 279A of the Planning & Development Act 2000 (as amended) for the purposes of Part XXI, and as set out in Schedule 1 of the Planning and Development (Maritime Development) Regulations, 2023. Section 320 of the Planning & Development Act, 2000 (as amended) also provides for "*A coastal planning authority may consult with the Maritime Area Regulatory Authority for the purposes of this Part.*"

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Maritime Area Consent

Any proposed development within the maritime will in general require a Maritime Area Consent (MAC) prior to seeking planning permission, unless privately owned maritime site, or an existing foreshore lease or licence for the proposed can be demonstrated.

In accordance with Section 96 of the Maritime Area Planning Act 2021, the holder of a MAC shall, before expiration (if any) of the MAC, rehabilitate that part of the maritime area subject of the MAC, and any other part of the maritime area, adversely affected by the maritime usage the subject of the MAC.

Rehabilitation Schedule

In accordance with Section 96 of the Maritime Area Planning Act 2021, the holder of a MAC shall, before expiration (if any) of the MAC, rehabilitate that part of the maritime area subject of the MAC, and any other part of the maritime area, adversely affected by the maritime usage the subject of the MAC. The Planning Authority should be cognisant in their assessment of any future applications in the maritime area, for decommissioning, rehabilitation, and the long term implications to the State of leaving structures or materials in situ. The management of the States maritime area is the responsibility for MARA.

The making of submissions or observations by the Maritime Area Regulatory Authority under this section shall not prejudice the performance by it of any of its other functions.

For any further information on MARA or to view any MAC or MUL applications, please visit the MARA website: www.maritimeregulator.ie

If you have any queries or require further information in relation to this matter, please contact the undersigned in the Assessment, Research and Data Unit of MARA directly. I would be grateful if receipt of this correspondence, could be formally acknowledged by email to the following consultation@mara.gov.ie.

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.8 An Post

No.	Link to submission
26	An Post

Item 1 Preamble
<p>An Post welcomes the opportunity to comment on this Draft LPF and Proposed Variation to the CDP. This initiative represents a significant step towards supporting the sustainable development of Arklow, consistent with the objectives of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region.</p> <p>Operational Context</p> <p>An Post owns and operates two postal facilities in Arklow:</p> <ul style="list-style-type: none"> • A retail unit on Main Street, and • A Delivery Services Unit (DSU) in Knockenrahan Industrial Estate. <p>As part of its ongoing commitment to providing a robust and reliable public service, An Post continually reviews its facilities and landholdings to ensure operational efficiency and alignment with local and national policy objectives. An Post is eager to engage proactively with Wicklow County Council to ensure its services continue to support sustainable community development.</p>
<p>Chief Executive Response</p> <p>Noted</p>
<p>Chief Executive Recommendation</p> <p>No change to draft Arklow LPF/Variation.</p>

Item 2 Local Transport Plan
<p>An Post notes and welcomes the inclusion of the Local Transport Plan accompanying the Draft LPF, which outlines measures to promote active travel and enhance public transport in Arklow. While An Post supports these sustainable mobility initiatives, we wish to emphasise the importance of maintaining appropriate vehicular and delivery access to An Post’s existing facilities on Main Street and in Knockenrahan Industrial Estate.</p> <p>A proposed pedestrian/cycle bridge is proposed from St. Mary’s Carpark (south of the river) is noted to be in close proximity to the Main Street Post Office. Relevant Active Travel Interventions include:</p> <ul style="list-style-type: none"> • AT1 – River Crossing - Progress the development of the Kilbride Pedestrian and Cycling Bridge to reduce overreliance on 19 Arches Bridge & open up development lands at Kilbride • AT4 – Main Street - Enhance public realm + walking environment + pedestrian priority at local junctions <p>An Post is supportive of the proposed interventions, however, given the proximity to the An Post Main Street facility, we respectfully request that Wicklow County Council engage directly with An Post during the planning, design and implementation of any active travel or movement strategy. It is essential that such initiatives balance sustainability objectives with the operational requirements of key public services.</p>
<p>Chief Executive Response</p> <p>Designs for Active Travel Interventions AT1 and AT4 have not yet been developed. Each will be subject to an individual appraisal process, including planning and design, and full engineering and environmental</p>

assessment. All planning applications / consent processes are similarly subject to public consultation that the onus is on An Post to engage with.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 3 Access & Delivery Requirements

An Post plays a central role in Irish life and society, providing an essential public service delivering mail and parcels to more than 2.2 million business and residential addresses six days a week. An Post's operations in Arklow including Mails & Parcels (eCommerce logistics) and Customer Retail services, are vital to meeting public and commercial postal needs in the region. To ensure the continued efficiency of these operations, we stress the following:

- **Access Needs:** Continuous, 24-hour access is often required to An Post facilities, with early morning deliveries and late evening collections being particularly important. This enables timely sorting and distribution across the wider network.
- **Location-Specific Operations:** Facilities require unrestricted access for both An Post vehicles and customer use. Public infrastructure such as post boxes and counters must also remain easily accessible.
- **Vehicular Access:** Adequate provision of loading bays and vehicular access is essential to support logistics and facilitate customer access to postal services.

We respectfully request that these operational needs be appropriately reflected in the final Local Transport Plan, and that any future movement or public realm strategies safeguard access for essential service providers such as An Post.

Chief Executive Response

While this point is noted, it is not a matter relevant to a land-use framework; it is an operational and road safety matter relevant to the Local Transport Plan.

Draft Arklow and Environs Local Transport Plan Measure PK 6 (Delivery and Servicing) notes that *"WCC will work with key stakeholders and businesses to support a more efficient regime of delivery and servicing and mitigate any conflicts and impacts on the public realm and other road users."* It further notes that WCC will consider *"engagement with all relevant stakeholders to assess existing delivery and servicing arrangements."*

The Local Transport Plan is an Appendix to the Arklow Local Planning Framework and, once adopted will be used for the ongoing management and planning of transport in Arklow. Measure PK 6 will allow appropriate engagement with An Post as part of the ongoing management of delivery and servicing in Arklow.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Engagement & Collaboration & Conclusion

Given the essential public service role of An Post in Arklow, we strongly recommend direct engagement between Wicklow County Council and An Post during the finalisation of the LPF and associated CDP variation. Ensuring continued, unobstructed access for deliveries and collections is vital to maintaining reliable postal services for the community

Conclusion

An Post welcomes the publication of the Draft LPF for Arklow and the opportunity to contribute to the plan-making process. As outlined, An Post's operations at Main Street and Knockenrahan Industrial Estate are essential components of the town's service infrastructure.

Chief Executive Response

All plans / plan variations / planning frameworks are subject to public consultation and the onus is on An Post to engage with, as they have done so here in this process. With respect to specific development projects, all planning applications / consent processes are similarly subject to public consultation that the onus is on An Post to engage with.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.9 National Environmental Health Service (HSE)

No.	Link to submission
27	National Environmental Health Service (HSE)
Please also see Section 4.2.13 of this report, which addresses all SEA related submissions.	

Item 1 Preamble
<p>As stated in documents reviewed the purpose of Variation No. 5 is to make a new local land-use plan for the town of Arklow and integrate the draft and final local planning framework into the Wicklow County Development Plan 2022 – 2028.</p> <p>The National Environmental Health Service (NEHS) has drafted this submission in response to the draft Arklow Local Planning Framework 2025 under Proposed Variation No. 5 to the Wicklow County Development Plan 2022 – 2028.</p> <p>Much of the following simply restates the submission made during the Pre-Draft Consultation for the Arklow Local Area Plan made on April 1st 2024.</p>
Chief Executive Response
Noted
Chief Executive Recommendation
No change to draft Arklow LPF/Variation.

Item 2 Review of the Written Statement
<p>The written statement is structured into a Part A and Part B with stated strategic goals around Healthy Placemaking, Climate Change and Economic Development. From a public health perspective the strategic goal of Healthy Placemaking is in keeping with the vision of a Healthy Ireland <i>“where everyone can enjoy physical and mental health wellbeing to the their full potential, where wellbeing is valued and supported at every level of society and is everyone’s responsibility”</i>.</p> <p>The aim of creating a healthy place also fits in with the prevention and promotion elements of universal health coverage and setting such a strategic goal is to be welcomed.</p> <p>Under Section B3 Housing Development it is recommended to add the word “Resilient” to Sustainable Communities. It is also recommended to specifically integrate the principle of Disaster Risk Reduction and utilise the Sendai Framework for Disaster Risk Reduction 2015 – 2030 as a tool to reduce the risk of disaster. If one seeks to have Sustainable and Resilient Communities it helps to address both side of the climate action coin, namely mitigation and adaptation.</p> <p>More generally there are some aspects of the framework plan that could be strengthened from a climate action and addressing other environmental determinants of health.</p> <p>Reference could not be found to the Sustainable Development Goals (SDGs) within the framework. It is recommended to reference the SDGs in the final plan and demonstrate how the plan contributes towards the meeting of all 17 SDGs and 169 targets by 2030.</p> <p>Reference could not be found to ways in which the framework plan will address or support the move towards a circular economy and manage waste in accordance with the waste hierarchy. It is recommended to integrate actions that move towards a circular economy.</p>

Another aspect not found in the framework plan is reference to ways in which communities may be supported to grow their own food through the use of allotments for example. **It is recommended to consider the inclusion of mechanisms that better enable the residents of Arklow to grow their own food.**

In the context of the objective to deliver a healthy place or in this instance Arklow reference could not be found to key determinants of population health namely air quality and noise. Both are important considerations in delivering a healthy place. **It is recommended to plan an Arklow that has the best quality air to protect the community and minimises noise to health protection standards.**

Chief Executive Response

The Chief Executive welcomes these comments and the support for the strategic goal of Healthy Placemaking. The Arklow LPF forms part of the CDP, which already contains multiple objectives and policies supporting the three 'strategic principles' of Healthy Placemaking, Climate Action and Economic Opportunity.

The National Environmental Health Service HSE has made several recommendations to the Arklow LPF; however, it is considered that it is not necessary to add new or updated objectives to the LPF as these matters are already covered by the County Development Plan.

HSE Recommendation (Summary)	Relevant part of the CDP
Section B3 Housing Development: add the word "Resilient" to Sustainable Communities.	Section B3 of the LPF is referencing Section 2.1.2 of the CDP, which lists the Healthy Placemaking considerations that have been integrated into the CDP. Therefore, as Section B3 references specific wording in the CDP, it would not be appropriate to add "Resilient" in this place. Nevertheless, the theme of resilience is found throughout the CDP, in particular in the vision for the County (Section 2.4.1) and Strategic County Outcome SCO2.
Integrate the principle of Disaster Risk Reduction and utilise the Sendai Framework for Disaster Risk Reduction 2015 – 2030 as a tool to reduce the risk of disaster.	It is not the role of a Local Plan to provide a strategy for 'disaster risk reduction'. This may be a suggestion that would be more appropriately directed to the Climate Action team for consideration. Nevertheless, the CDP contains multiple objectives relating to principles of risk reduction, notably: <ul style="list-style-type: none"> • CPO 14.01 – 14.16 (flood risk management) • CPO 15.1 (protect environment from construction activities) • CPO 15.8 (Prevention of Major Accidents) • CPO 15.9 – 15.11 (Air Pollution) • CPO 15.12-15.16 (Noise Pollution) • CPO 15.17 – 15.20 (Light Pollution) In the LPF itself ARK 32 also sets objectives for the Prevention of Major Accidents.
Reference the SDGs in the final plan and demonstrate how the plan contributes towards the meeting of all 17 SDGs and 169 targets by 2030.	All objectives in the County Development Plan are written with the specific aim of fulfilling the Development Plan Vision, desired 'Strategic County Outcomes' and the 'Core Strategy' of the plan. The County Development Plan Vision and Strategic County

	Outcomes are themselves broadly aligned with the Regional Strategic Outcomes of the RSES, the National Strategic Outcomes of the NPF, and the United Nations Sustainable Development Goals.
Integrate actions that move towards a circular economy.	Strategic County Outcome SCO7 (Climate Resilience & the Transition to a Low Carbon Economy) facilitates <i>"the sustainable management of waste including the circular economy."</i> CPO 9.21 is to <i>"To encourage and facilitate the 'circular economy' and the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation."</i> Furthermore, Section 1.4.6 of the Development and Design Standard require Construction Environmental Management Plans to adopt circular economy principles, which is in turn supported by ARK 67.
Consider the inclusion of mechanisms that better enable the residents of Arklow to grow their own food.	CPO 7.49 of the CDP sets out an objective <i>"to support and facilitate the development of allotments and community gardens"</i> .
Plan an Arklow that has the best quality air to protect the community and minimises noise to health protection standards.	The CDP contains multiple objectives relating to principles of air quality and noise, notably: <ul style="list-style-type: none"> • CPO 15.9 – 15.11 (Air Pollution) • CPO 15.12-15.16 (Noise Pollution)
<ul style="list-style-type: none"> - Set metrics to help determine if Arklow is in fact a healthy place following implementation of the plan. - Assess the health impact of the plan in a holistic manner that goes beyond measuring the availability of health care services (GPs, Pharmacies etc.) but assesses those wider environmental determinants of health such as action on climate change, air quality, noise, active travel journeys and other indicators that could be set. 	<p>Chapter 20 of the CDP considers the Implementation and Monitoring of the CDP. The Planning Section of the Council is the lead section responsible for monitoring and implementing the objectives of the CDP/LPFs, through planning permissions granted, development contributions and the general pattern of development. Policies and objectives will also be reviewed as part of the preparation of the new County Development Plan which is due to commence in 2026.</p> <p>The Arklow LPF's Draft Strategic Environmental Assessment (SEA) Environmental Report includes the implementation of the statutory SEA monitoring, and proposes that the existing Strategic Environmental Objectives, which include 'Population & Human Health', and associated indicators and targets defined in the CDP are used to monitor the environmental effects of the implementation of the LPF.</p> <p>The WCC Climate Action Plan details a range of KPIs, reporting requirements and arrangements, with regard to its implementation. Arklow, in particular, has been designated as a 'Decarbonisation Zone'</p> <p>The CDP/LPF co-ordinates the work and objectives of other directorates including, for example, Arklow Municipal District and WCC Roads section who will lead on the implementation of the LTP.</p>

	Together, this monitoring and implementation will ensure that health will be monitored in a holistic manner.
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Having regard to the above, it is considered that existing CDP / draft LPF objectives provide appropriate support to the goal of Healthy Placemaking, as befits the Arklow LPF's role as a land use framework. Therefore, it is not necessary to add new or updated objectives to the LPF.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 3 Pre-Draft Submission

The National Environmental Health Service (NEHS) has drafted this initial consultation to support Wicklow County Council deliver a local area plan for Arklow that protects and promotes population health. The Arklow Local Area Plan (hereafter referred to as the Plan) should fit the vision of the Healthy Ireland Framework "where everyone can enjoy physical and mental health wellbeing to the their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility"

The following observations are made under the remit of Healthy Ireland and relevant health supporting policies, strategies and plans. It takes account of the pre-draft issues booklet accessed to inform this submission.

The observations are made under the following headings

Climate Change

Climate Change is the greatest threat to global health this century and climate action is the greatest opportunity for delivering health gain. Climate action (a noted objective of the Wicklow County Development Plan) should be central to the plan to both Mitigate/reduce/eliminate Green House Gas emissions and Adapt to climate change in order to protect present and future generations.

The plan should support actions that move Ireland to "a low carbon, climate-resilient, and environmentally sustainable economy by 2050" as set out in the Climate Action and Low Carbon Development Act 2015 – 2021. The latest Climate Action Plan 2024 (out for public consultation as this submission is written) should form the basis for developing a low carbon, climate-resilient, and environmentally sustainable Arklow by 2050 with interim targets for 2030. Examples of actions include

- Citizen engagement – a plan that contributes to delivering "climate literacy" and enables citizens to take action to improve the quality of life for themselves and fellow citizens. The delivery of a low carbon, climate-resilient, and environmentally sustainable Arklow can only be achieved with the full participation of everyone. For example active travel options will only succeed if they are actually used by the community. Supporting behaviour/lifestyle change, such as the uptake of active travel, through "climate literacy" will be crucial to success.
- A plan that meets the National Planning Objective 54 under Project Ireland 2040 and the National Planning Framework which is to "reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate mitigation and adaptation objectives, as well as targets for green-house gas emissions reduction".
- A plan that supports a just transition that leaves no one behind to a Climate Neutral Ireland and by extension Arklow
- A plan that builds better, to Zero Emission Building (ZEB) standard in all new construction and supports retro-fitting of all other building stock.

- A plan that delivers healthier housing, healthier workplaces and healthier communities through effective urban planning, design and construction. The consultation document on the portal does indicate that the new Local Area Plan will promote healthy placemaking, through quality urban design, public realm and active travel, which in turn helps create a healthy environment for healthy communities to grow.
- In the context of Healthy Placemaking the plan should consider how to measure how a healthier Arklow will be compared to the present Arklow. A number of metrics may need to be developed such as air quality, water quality, availability of recreational space, modes of transport used by those who live, work and play in Arklow etc. to help assess impact in this area.
- Development of a transport system that delivers on the principles of Shift – Avoid – Improve.
 - A plan that through land use planning assists people to Reduce or Avoid the need for travel, linked to some extent to the issue of compact growth and the question posed on what urban design standards should apply in Arklow Town and the statement made under housing about sustainable settlement patterns.
 - A plan that enables people Shift to more environmentally friendly modes of transport such as walking, cycling or public transport.
 - A plan that improves the energy efficiency of vehicle technology – for example perhaps only allowing car share that utilises hybrid or fully electric vehicles or only allows the use of zero or near zero emission vehicles in the delivery of public transport.
 - A sustainable transport and infrastructure part of the plan that places sufficient emphasis on empowering or enabling people to transition through a balance on physical infrastructure (segregated cycle lanes, secure bike parking etc.) and “softer” enabling factors. “Soft” enabling factors may include bike libraries, safe cycling training for children, etc.
- A plan that facilitates the large scale deployment of renewable energy technologies to help deliver Ireland’s emission reduction targets. This should include the utilisation of public buildings (schools, health centres etc.) for the generation of on-site energy via for example solar panels, wind turbines and/or geothermal heat sources. A mix of wind, solar and geothermal energy sources would reduce the potential need for energy storage systems for periods when solar or wind generation are low.
- A plan that adapts to climate change and builds resilience for the residents of Arklow. In practical terms this implies
 - A community that is resilient to severe weather events such as floods, but not just floods and including windstorms, extreme heat, including the contribution of heat/dry spells to the risk of forest fires, and other potential severe weather hazards including cold snaps.
 - Incorporating rain water harvesting/water recycling to build resilience to dry spells/drought conditions.
 - Particular attention is drawn to protecting vulnerable people such as older persons and young children from extreme heat events and planning a landscape that limits the urban heat island effect, provides green and blues spaces, provides shade and other measures to cool the local environment in advance of and during heatwave events. This includes green and blue spaces within the town.
 - A plan where rain water harvesting, drainage (including sustainable drainage) and waste management infrastructure limit the opportunities for vectors of disease, such as mosquitos and flies to breed.
 - Land use management that reduces exposure to aero-allergens that may contribute to the burden of asthma and other allergic impacts on people.
 - A plan that anticipates and prepares for climate related displacement of people locally and a potential influx of migrants from other places (locally and globally). Connected to DRR below.
 - Health specific reference under adaptation can be found in the Dept. of Health’s Health Sector Adaptation Plan 2019 – 2024 which is due for renewal shortly.

Sustainable Development Goals

The plan should support action towards the achievement of the Sustainable Development Goals as set out in Agenda 2030. Specifically it should deliver towards SDG 3, which is to “ensure healthy lives and promote well-being for all at all ages”. The achievement of SDG 3 is dependent on achieving so many other SDGs and the

plan should map out the SDGs that will make the greatest contribution to SDG 3. One of the most relevant in the context of this Local Area Plan is SDG 11 "sustainable cities and communities"

The plan should align with the Government's National Implementation Plan for the Sustainable Development Goals 2022 – 2024. A key principle to deliver is on the principle of "Leave No One Behind".

Disaster Risk Management including Disaster Risk Reduction (DRR)

The consultation document on the portal does state that the Local Action Plan has a key role in climate action by including measures to adapt to climate change and transitioning to a low carbon and climate resilient town.

The consultation document on the portal makes specific reference to the management of areas prone to flooding and the coastal zone will also be addressed in the new Local Area Plan. Strategic Flood Risk Assessment is also referred to under other topics. However, the types of hazards that potentially give rise to a disaster are numerous and go beyond floods and coastal erosion. To fully understand the potential risks that may impact on health a Climate Change Risk Assessment is recommended which may fit under priority one of the Sendai Framework referred to below.

The plan should apply the Sendai Framework for Disaster Risk Reduction 2015 – 2030 and adopt the four priorities of

- Understanding disaster risk
- Strengthening disaster risk governance to manage disaster risk
- Invest in disaster risk reduction for resilience
- Enhancing disaster preparedness for effective response, and to "Build Back Better" in recovery, rehabilitation and reconstruction

Other local authorities may refer to A Framework for Major Emergency Management which should be applied for sudden onset disasters (such as severe weather events like floods and windstorms) but this framework should also be applied to slower onset threats/disasters such as declining water availability and infectious disease risks.

Inclusiveness

The plan should aim to be as inclusive as possible taking account of the demographic and lifestyle mix in Arklow, as highlighted on the consultation portal. The following outlines some of the issues to consider in the plan:-

- A plan that is Age Friendly for the likes of older and younger persons. Takes account of the National Positive Aging Strategy and literature around to support Older People Remaining at Home (OPRAH).
- A plan that delivers for Persons with a Disability ensuring people are not impaired or excluded from active participation in their community – may include issues around street lighting, footpaths, roads, public seating etc.)
- A plan that delivers for Youth/Adolescents supporting safe spaces to socialise and play
- A plan that delivers for disadvantaged and marginalised groups, such as the homeless, travellers and others.
- A plan that delivers for the present and future ethnic and cultural mix in Arklow. For example supporting cricket players as well as hurlers.
- A plan that delivers for all genders and empowers women and girls in particular. For example a plan that supports girls to remain physically active and protects boys from engaging in dangerous activities.

Physical Activity/Sustainable Movement

The plan should enable/support all of all ages to engage in active play/sport (in formal and informal spaces) and active travel that results in a more active and healthy community with the co-benefits of safer streets, less congestion, reduced carbon emissions, better air quality and a positive climate impact. Transport options

should be prioritised in line with the transport hierarchy putting pedestrians first followed by cyclists, public transport and private vehicles at the bottom and deliver on the Road Safety Authority's strategy 2021 – 2030 priority seven, regarding safe and healthy modes of travel. Wicklow County Council (WCC) should give consideration to the physical separation of pedestrian and cycling paths to ensure safe and healthy travel for all. Separating different modes of transport from one another may be another factor to bring about the actual use of such infrastructure.

Rights of way should be prioritised in line with the transport hierarchy and cyclists should be supported with ample and secure bike parking (including those with electric bikes) in the right locations.

The issue of scooters will need to be considered in the context of active travel and road safety. In the drafting of the plan reference should be made to the following

- National Sustainable Mobility Policy 2022
- Smarter Travel Policy 2009 – 2020 and/or recent updates
- National Cycle Policy Framework 2009 – 2020 and/or recent updates
- Government Road Safety Strategy 2021 – 2030
- Get Ireland Active – National Physical Activity Plan for Ireland
- Healthy Ireland - A Healthy Weight For Ireland Obesity Policy and Action Plan 2016 – 2025
- Every Move Counts, National Physical Activity and Sedentary Behaviour Guidelines for Ireland, March 2024

Air Quality

The plan should look to deliver the highest attainable air quality for the people of Arklow and beyond. Hotspots of poor air quality should be identified, in areas with high traffic volumes for example, and mitigation measures put in place to improve air quality to the latest health protection standards of the WHO Air Quality Guidelines 2021.

The development of the plan may also refer to the Clean Air Strategy published in April 2023

Energy

Energy systems chosen should aim to reduce or eliminate air pollution and support renewables including energy storage systems towards the goal of being carbon neutral by 2050

Noise

Noise is widely recognised as the second biggest environmental determinant in Europe after air pollution. The plan should have a noise map of the area and look to ensure existing noise levels that are potentially detrimental to health are minimised. The plan should also look to ensure future developments do not breach noise thresholds at day, evening and night times that are potentially harmful to health and/or are a nuisance to people and their pets/animals.

Water Quality and Waste Water

The plan should look to protect existing and future planned water bodies from potential sources of pollution.

In the context of growth the consultation portal refers to the need for an extra 1,221 new homes between now and 2031 and that these homes must be provided in a sustainable manner. In the context of this growth, water supply and waste water treatment capacity must be capable of coping with existing and future growth loads.

The plan should look to enhance water bodies and provide a greater variety of amenity to the people of Arklow and beyond including the tourism opportunities.

Circular Economy/Waste

The plan should look to be aligned with the Circular Economy and Miscellaneous Provisions Act of July 2022. The plan should follow the principles of the waste hierarchy to first of all eliminate the generation of waste in the first place, including single use items, thereafter reduce, reuse and recycle waste including supporting “the right to repair” and work towards a Circular Economy. Some key areas to highlight include

- Supporting the people of Arklow to segregate waste in public spaces.
- Supporting food waste reduction in a number of key settings including the local authority itself, commercial premises, schools, health and social care facilities.
- Supporting access to free drinking water refill stations in public spaces
- Supporting “zero waste” businesses and businesses offering repair services.

In drafting the plan reference could also be made to

- A Resource Opportunity – Waste Management Policy in Ireland 2012 and the more recent
- National Waste Management Plan for a Circular Economy 2024 - 2030

Sustainable/Healthy Diets

The plan should look to support sustainable diets for all the people of Arklow. This may include some or all of the following:-

- Leading by example in Wicklow County Council to source food locally and to promote sustainable diets that are more plant based.
- Enabling the communities of Arklow to Grow their Own Food
- Balancing the mix of food businesses and “fast food” businesses in the area to give people the option to “make the healthy choice the easy choice”

Tobacco and Disposable Vapes Free Ireland

The plan should look to assist in the delivery of a Tobacco Free Ireland as outlined in the Tobacco Free Ireland Report 2013 and respond to anticipated changes regarding the accessibility of Disposable Vapes in Ireland.

Chief Executive Response

These comments were submitted by the HSE in response to the pre-draft consultation. As a result they have informed the objectives contained within the published draft Arklow LPF, where appropriate.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.10 Department of Education and Youth

No.	Link to submission
29	Department of Education and Youth

Item 1 Population
<p>In the context of future population trends and their potential impact on school place requirements, the department notes that this draft Framework refers to the population growth identified for Arklow in the recent draft Wicklow County Development Plan 2022-2028. The department notes that the population scenario envisaged in Wicklow overall is the high NPF target of 173,500 by 2031. The department made its submissions to the CDP regarding Arklow on the basis of the potential population growth within the settlement and its environs between 2023 and 2031.</p> <p>In terms of future population growth in Arklow as identified in the draft LPF, the department notes that Table A:2.1 outlines a proposed 2031 population target of 16,441 for Arklow. Table A:2.1 contains housing growth targets for 2031, allowing for the Census 2022 average per household figure of 2.84 identified for County Wicklow, these proposed 6,627 units could see a population increase to 16,358 in Arklow. In terms of other potential population targets, it is noted that Table 3-2 in the draft Local Transport plan identifies a potential 2042 population of 28,000 for Arklow. Furthermore, the department is equally mindful that the current NPF review has the potential to allocate a further projected population increase that could go beyond 16,441. Such targets have the potential to impact on future school place provision, both in the medium and long term future beyond the lifetime of the proposed plan.</p>
Chief Executive Response
Noted
Chief Executive Recommendation
No change to draft Arklow LPF/Variation.

Item 2 Schools
<p>There are currently 9 schools (five primary and four post-primary schools) located in Arklow. The department's preference would be to expand these existing facilities (if possible) should there be a requirement for additional school places resulting from planned population increases.</p> <p>The population targets identified in the Arklow LPF would see the demand for primary and post primary school places increase and could place pressure on existing schools to cater for the extra school place requirement. In this regard, the statement in the section B:6.1 Education is noted <i>"It is considered that demand in the town could quickly surpass supply during the lifetime of this LPF if residential development significantly and quickly increases. This is a particular consideration noting the pause in development in Arklow Town over the last 10 years due to the lack of a waste water treatment facility which has now been rectified. It is considered that towards the end of the lifetime of the LPF the existing primary schools in Arklow may start to reach saturation if the 2031 population target is achieved. This would indicate that there will be a need for schools to either expand or a fifth primary school to be planned for and built"</i>. The department also notes that it states the following in relation to post-primary school provision: <i>"If growth in the settlement exceeds the 2031 target there will be a need to plan for a fifth post primary school in the settlement. In order to ensure that such a school can be planned for in the medium to long term, this LPF shall ensure that there is appropriate zoned land to accommodate at least 1 new post primary school"</i>. In relation to the above, the department acknowledges the list of existing school sites and the proposed "community & education" zoned sites as identified in Table B:6.1. The department understands that the requirement for these potential new school facilities may not materialise within the lifetime of this County Development Plan.</p>

It is important to add that it is generally considered that schools are enabling infrastructure for housing and as such, schools should be positioned in the heart of new and expanding sustainable communities, allowing for the maximum benefit to the community inside and outside school hours. Further to this, other community facilities and amenities should also be positioned close to school facilities to allow for all community facilities be complimentary to each other for the benefit of the whole community. All enabling infrastructure required to develop and operate school facilities should be provided in advance of the need for such schools. This infrastructure includes road, electricity, water infrastructure, sustainable transport links, active travel networks, road safety measures and safe routes to school facilities. It should be noted that it is not within the remit of the Department of Education and Youth to develop or fund this enabling infrastructure.

In relation to other aspects of the draft plan, the department notes that the Council plans a range of Safe Routes to School improvements to deliver safe, accessible and child-friendly walking and cycling infrastructure. The department notes and welcomes Active Travel Objective ARK68 to support the implementation of the recommendations of the (Draft) Local Transport Plan with regard to the delivery of proposed road safety measures and safe active travel routes along the existing road network and along new off-road routes and to continue to promote and encourage the "Safer Routes to School" and the 'Green Schools Programme' within Arklow. The department supports the development of sustainable travel links between schools and residential areas.

Chief Executive Response

The CE notes the Department's preference to expand existing school facilities (if possible) should there be a requirement for additional school places resulting from planned population increases, and welcomes their support for active travel measures.

The Social Infrastructure Audit prepared to inform the preparation of the Arklow LPF outlines that there are currently five primary schools, four post-primary schools and one further education / training centre in Arklow. A new campus is being constructed in Kilbride for Gaelscoil an Inbir Mhóir (primary) and Gaelcholáiste na Mara (post-primary) which will relocate from their existing temporary locations.

The audit outlines that there are sufficient **primary school** places for the current demand in Arklow town and the wider area. Taking account of the planned growth of the town, there will not be a need for an additional primary school in Arklow in the immediate term; however, as new housing is delivered during the course of the LPF, existing primary schools will either need to expand or a sixth primary school provided.

The LPF has made provision for both of these scenarios by including zoning for the expansion of existing schools where feasible, the new Gaelscoil campus, and the provision of further new primary schools. Land for a new primary school has been zoned 'CE – Community and Education' in south Arklow, in SLO3 'Abbeylands and Tinahask Upper', an easy walking distance of the planned residential community in this area and a reasonable walking distance of existing residential areas in south Arklow.

In terms of **post-primary schools**, there are sufficient places available in Arklow in the immediate term. As new housing is delivered during the course of the LPF, there will be a need to expand existing schools or provide a fifth post-primary school.

Again, the LPF has made provision for this expansion of school places by providing zoning to accommodate the expansion of existing schools where feasible, the delivery of the new Gaelcholáiste campus and further new post-primary schools. The LPF has zoned land 'CE' to accommodate at least 1 new post primary school in the medium term in south Arklow. The site is within SLO4 'Tinahask Upper-Money Little & Money Big', an easy walking distance of the planned residential community in this area and a reasonable walking distance of existing residential areas in south Arklow.

Furthermore, in order to address the possible future gap in provision in south-west Arklow and to future-proof the LPF and to ensure site choice, a site on the western side of the Wexford Road in south Arklow will also be zoned 'CE', which could accommodate the **development of either a primary or post primary school** as required.

To provide further future proofing, Objective ARK 43 states that "... *the development of new schools shall be permissible in principle in all land use zones in this LPF, other than OS1 and OS2...*" subject to certain criteria.

Therefore, the LPF provides sufficient land use zoning and flexibility for a range of solutions to school place needs to be brought forward in the future.

Note: After receipt of this submission, a subsequent submission was made by the Department to Variation No. 6 of the CDP outlining the following with regard to Arklow:

- If the targets identified in Variation No.6 are achieved it would see a potential future requirement for at least one additional primary school in Arklow subject to the projected population materialising
- Allowing for further housing development identified beyond 2031, a potential requirement for a second additional primary school will also need to be considered
- The targets in this variation will further increase the need for future post-primary school place provision.

It is considered that the provision of the LPF as detailed above, also adequately meet the potential additional needs identified.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 3 Social and Community Infrastructure Objectives

The department notes and acknowledges the following Social and Community Infrastructure Objectives;

ARK 43 *Having regard to the potential longer term education needs in the Arklow area which have not been determined at this time but may arise; the physical and environmental constraints present in the area; and the space required particularly for new secondary schools, the development of new schools shall be permissible in principle in all land use zones (other than OS1 and OS2) subject to sufficient spatial separation from any existing primary school.*

ARK 44 *The Planning Authority will resist developments that entail the loss of existing community, education and open space/recreation lands or buildings unless it can be demonstrated that (a) adequate community, education and open space/recreation lands and buildings would be retained in the settlement having regard to the planned future population of the settlement or (b) the particular lands or buildings are not suitable or needed for current or future educational, community or open space / recreational usage. In particular, developments that would unduly constrain the ability of existing schools to expand will not be permitted.*

ARK 46 *To facilitate and encourage the co-location of childcare facilities with other educational facilities such as schools. Applications for the development of new educational facilities, or the significant redevelopment or extensions of existing facilities, should consider the provision of co-located childcare facilities within the development.*

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Special Education Needs

The department also anticipates that additional Special Education Needs (SEN) provision at both Primary and Post Primary level will be required in the future throughout the country and this may result in schools requiring additional accommodation or space to meet this growing need. On a point of information, the Department of Education and Youth engages closely with the National Council for Special Education in relation to the forward planning of new special classes and additional special school places. The National Council for Special Education (NCSE) has a statutory function to plan and co-ordinate the provision of education and support services to children with special educational needs, in consultation with the relevant education partners and the Health Service Executive (HSE). This includes the establishment of special class and special school placements in various geographical areas where there is an identified need.

The department and the NCSE are working with schools and patrons to make increased provision for children with special education needs, both in special classes at mainstream schools and in special schools. At post primary level, all schools have been advised to plan for an average of 4 special classes. At primary level, the focus is on ensuring appropriate provision at all medium to large primary schools (8 mainstream classes or more) in the first instance.

Most special classes are established in existing accommodation and where there is a further requirement within that accommodation, additional capacity can be catered for through the provision of extension facilities.

In recent years, the department has seen an increase in SEN school place requirement. Since 2019, 11 new special schools have been established, with five more due to be established for the 2025/26 school year. The continuing need for additional provision across the country, including in the Wicklow area, is kept under constant review. In this regard, the department will consult with the Council if and when additional special education needs accommodation or sites for future special schools are required within specific locations. In the context of this Framework plan and being mindful of the population growth that may arise from the various future planned housing developments within the Arklow area and its surrounds, the department would welcome explicit support within the plan for the provision of school accommodation for children and young people with special educational needs.

Chief Executive Response

While this point is noted, the suggestion for policy support for special education needs is not considered appropriate to a land-use plan; the LPF does not distinguish between education users types but supports all education and care development at appropriate locations

As outlined in the response above, the LPF makes zoning provision to allow the expansion of existing schools where feasible, a new education campus for the Gaelscoil and Gaelcholáiste, and the provision of new schools as required.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 5 Future Capacity

In terms of assessing current and future capacity, the Department of Education and Youth has to be mindful of potential unforeseen circumstances such as the Ukrainian crisis, which have the ability to put undue pressure on school place provision and could necessitate reassessments of school place provision from time to time. The department will engage with the Council where the findings of an assessment require a review of existing or future school site provision within a specific location.

Finally, the department welcomes the continued engagement with the Council regarding the development of both new and existing schools, as appropriate, and emphasizes the critical importance of the ongoing work of the Council in ensuring sufficient land is zoned for this purpose. We look forward to continuing to work with you. If you have any queries in respect of the above, please feel free to contact me.

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.11 Uisce Eireann

No.	Link to submission
30	Uisce Eireann

Item 1 Preamble

Uisce Éireann (UÉ), welcomes the opportunity to submit observations on the proposed CDP Variation. We understand that the reason for the variation is:

- To make a new local land-use plan for the town of Arklow. The Arklow Local Planning Framework will, when adopted, replace the existing 'Arklow and Environs Local Area Plan 2018 - 2024'.
- To integrate the draft and final Arklow Local Planning Framework into the Wicklow County Development Plan 2022-2028 and to ensure consistency of the draft and final Arklow Local Planning Framework with the County Development Plan 2022-2028, it is proposed to vary the County Development Plan.

Arklow is recognised in the NPF as a key catalyst for growth in the Eastern and Midland Region. Its location on the Dublin–Rosslare corridor makes it well placed for planned population and job growth. The NPF supports compact, sustainable development in Arklow, with better housing, transport, and infrastructure to help balance growth across the region

In addition to our observations at the Issues Paper Stage, we have some high-level comments below:

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 2 Opportunity Sites

B.1.4 Opportunity Site 1 – The Alps	We note the presence of UE assets within the site that may need to be diverted or obtain a build over agreement. Wayleave to be maintained
B.1.4 Opportunity Site 2 – Main Street	We note the presence of UE assets within the site that may need to be diverted or obtain a build over agreement. Wayleave to be maintained

Chief Executive Response

Should any development proposals come forward for Opportunity Site 1 or Opportunity Site 2, the question of protection for UE assets and wayleaves can be determined through the development management process.

Chief Executive Recommendation

No change to Proposed Variation / draft Arklow LPF

Item 3 Water

B.8.4 Water Services Infrastructure	Water Supply There is adequate water supply. Leakage reduction and/or capital investment will be required to maintain/improve levels of service as demand increases
B 8.4.1 Water	Water Network Some water infrastructure limitations have been identified. A project is underway, and issues being addressed under the approved delivery plan.

Chief Executive Response

Noted. Uisce Éireann’s Water Supply Capacity Register (WSCR) 2025 indicates sufficient supply for the period of the LPF. As the WSCR is only a point in time, WCC and UE will continue to liaise in relation to changing requirements over the lifetime of the LPF.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Wastewater

B 8.4.2 Wastewater	<p>Wastewater Treatment</p> <p>There is adequate treatment capacity at the new WWT Plant which has a capacity of 24,000 Population Equivalent.</p> <p>Wastewater Sewer Network</p> <p>In order to service areas North / Northwest of the river, (SLO5 / the “Kilbride” lands) wastewater network upgrades are required to create capacity upstream of the northern interceptor sewer. The project is currently at design stage.</p> <p>In Arklow North (in the Coolboy area), we note the proposed change of zoning from Mixed Use to Employment. These changes, would material impact on the project at design stage and will affect the extent of UÉ network upgrades provided to serve the residential zoned lands.</p> <p>SLO3 / SLO4 in the south of the catchment also require wastewater network upgrades to create capacity for residential development. The upgrades required are to be assessed through a feasibility study with design to be progressed thereafter.</p> <p>SLO2 will require a wastewater network extension to serve the development lands adjacent to the harbour which should be considered as a synergy alongside any local roads project. This area is presently unserved and network requirements will similarly be assessed through the feasibility study. UÉ funded upgrades will be conditional on housing provision in the area.</p>
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Chief Executive Response

The CE welcomes UE's confirmation that there is capacity in the WWTP to support a population equivalent of 24,000, which will be sufficient to accommodate the servicing of all lands proposed for zoning in the LPF. The CE is also aware that the WWTP has the option to expand to serve a population equivalent of 36,000.

In terms of the wastewater sewer network, all zoned lands either connect to the existing network, or are capable of being connected through local network upgrades and are therefore serviceable. WCC and UE will continue to liaise in relation to changing requirements over the lifetime of the LPF. Uisce Éireann's role is supported by the LPF's objectives, including:

ARK 89 *To support and facilitate Uisce Éireann in the following:*

- *The improvement and increased resilience of the water distribution, supply and storage systems; The provision of necessary waste water infrastructure, in a sustainable manner; and*
- *The improvement of the combined drainage network and to ensure the separation of foul and surface water discharges.*

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.12 Meath County Council

No.	Link to submission
31	Meath County Council

Item 1
Please note Meath County Council has no comments to make in relation to same.
Chief Executive Response
Noted
Chief Executive Recommendation
No change to draft Arklow LPF/Variation.

4.1.13 Department of Climate, Energy and the Environment

No.	Link to submission
50	Department of Climate, Energy and the Environment
	Please also see Section 4.2.13 of this report, which addresses all SEA related submissions.

Item 1 Preamble

The Department of Climate, Energy and the Environment’s (DCEE) role is to support the Government realising its long-term objective of creating a climate neutral Ireland, powered by clean energy, where our environment, society and economy thrive, by working together to deliver climate action; the transformation of our energy systems; the protection and resilience of our environment and a resource-efficient economy. This vision also aligns with the UN 2030 Agenda for Sustainable Development and the 17 SDGs, which provide a plan of action for people, prosperity and planet, with the commitment to leave no-one behind.

The Government is committed to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030. These legally binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 (the Climate Act). The Climate Act supports Ireland’s transition to net-zero and the achievement of a climate neutral economy no later than 2050. It also establishes a legally binding framework with clear targets and commitments, to ensure the necessary structures and processes are in place to deliver national, EU and international climate goals and obligations in the near and long term. Against this background, strategies must be devised to reduce and manage climate change risks through a combination of mitigation and adaptation responses, both in the medium and longer term.

The step change in our ambition from a low carbon to climate neutral Ireland requires strong leadership across Government and the wider public sector. This Department will drive the climate agenda by engaging with local authorities to build resilience in citizens, communities, and business to overcome climate adaptation challenges, maximising climate mitigation and adaptation opportunities and facilitating the transition to a truly Circular Economy.

This will also help to deliver on the Government’s ‘whole-of-society’ approach for the successful implementation of the SDGs, driving in particular the achievement of Goal 7 on Affordable and Clean Energy, Goal 12 on Responsible Consumption and Production, and Goal 13 on Climate Action. Achieving the SDGs overall will require fundamental changes in many parts of Irish life, but it is also an opportunity to create a cleaner, greener, fairer economy and society.

The Department asks that you take the material outlined in the following sections into consideration when drafting the LPF, which align with our Statement of Strategy for the period 2025-2028, Le Chéile 28, which itself sets out our vision, mission, and five strategic goals in key policy areas.

The Department also asks that you take into consideration the framework of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets, in the overall drafting of the Plan, and in relation to the specific areas outlined below.

Wicklow County Development Plan (WCDP) 2022-2028

DCEE note the positive objectives of the WCDP 2022-2028, which places climate action as a strategic principle of the plan. Objectives at County level for climate action and renewable energy infrastructure inter alia, should be reflected by objectives and actions of the LPF, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes.

The following recommendations are an opportunity to strengthen objectives of the LPF.

Chief Executive Response

Variation No. 5 proposes the inclusion of new Part 6 to Section 2:2 of the CDP, which explains the role of LPFs. It states:

PART 6: INTRODUCTION TO LOCAL PLANNING FRAMEWORKS

6.1 Preamble

Local Planning Frameworks (LPF) form part of the Wicklow County Development Plan 2022-2028 and are adopted into the County Development Plan via the variation procedure set out under Section 13 of the of the Planning & Development Act 2000 (as amended) and / or any future processes for the making of variations to the Wicklow County Development Plan 2022-2028 that may come into effect during its lifetime.

The purpose of an LPF is to put in place a land use framework that will guide the future sustainable development of a settlement; the LPF, in conjunction with the County Development Plan, will inform and manage the future development of the LPF area.

Local Planning Frameworks will replace previous Local Area Plans; LPFs will build upon the successful strategies and objectives developed in previous Local Area Plans for each settlement but will adapt where necessary to reflect updated national and regional planning policy and guidance and general emerging planning issues.

The majority of policies, objectives and development standards that will apply in the LPF areas are already determined in the Wicklow County Development Plan and all efforts shall be made to minimise repetition of County Development Plan objectives in LPF other than a summary tailored to each settlement, unless it is considered necessary to emphasise assets or restate objectives that have particular relevance and importance to the LPF area. While this will facilitate the streamlining of each LPF to just those issues that are relevant to this area, and an overall reduction in the content of the LPF compared to the previous Local Area Plan, this should not be seen a diminution of the level of importance or indeed protection afforded to each area.

In particular, development standards, retail strategies, housing strategies etc that are included in the County Development Plan shall not be repeated. Any specific policies / objectives or development standards required for each LPF area will be stated as precisely that, and in all cases will be consistent with the County Development Plan. Thus development standards will therefore be the same across the entire County, and any differences for specific settlements would be clear and transparent, to both those adopting the LPF, and the general public alike.

Furthermore, LPFs shall only include objectives that are area specific and achievable, and avoid those that are aspirational or are best dealt with in the annual budget, road works programme, etc. The role of a land use plan or framework is to put in place a policy framework within which development can occur, but does not decide what works actually get done by either private individuals or public bodies. The delivery of objectives will be determined by the initiation of private development or by the allocation of public funding through the annual budgetary process, which is a separate process to any land use plan or framework.

Therefore the positive elements of the County Development Plan identified by the Department do not require to be re-iterated in this LPF, as they directly apply already.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 2 Climate Action

The Department notes Section 15(1) of the Climate Act 2021 which requires public bodies to “..perform its functions in a manner consistent with –

- (a) the most recent approved climate action plan,
- (b) the most recent approved national long term climate action strategy,
- (c) the most recent approved national adaptation framework and approved sectoral adaptation plans,
- (d) the furtherance of the national climate objective, and
- (e) the objective of mitigation greenhouse gas emissions and adapting to the effects of climate change in the State”

The Climate Action Plan 2025 (**CAP25**) is the third statutory annual update in the series of Ireland’s Climate Action Plans. The CAP25 lays out a roadmap of actions to meet our national climate objective of pursuing and achieving the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. We request that the Local Authority consider how the actions set out therein can be incorporated into the LPF, where relevant.

We request the Local Authority consider the following when preparing the LPF:

- The Long-term Strategy on Greenhouse Gas Emissions Reductions which sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050.
- Ireland’s National Climate Objective and the European Climate Law.
- The new National Adaptation Framework (**NAF**) which sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts.
- In all matters relating to Climate Action, local authorities should, in addition to consulting with their Climate Action Teams, consult directly with their own CAROs.

We would also draw attention to the framework of Agenda 2030 and the Sustainable Development Goals and ask that the Council pay particular attention to the targets outlined in SDG13 –Climate Action.

Recommendation 1

The LPF should support the implementation of the national Climate Action Plan, the Longterm Strategy on Greenhouse Gas Emissions Reductions, the National Climate Objective, the National Adaptation Framework and the UN Agenda 2030 and the Sustainable Development Goals through the preparation of effective objectives and actions for climate action in LPF area.

Recommendation 2

The Department recommends that an objective and / or policy is included in the LPF to support the implementation of CAP25 (and annual revisions thereof).

Chief Executive Response

The CE is satisfied that the very wide range of objectives set out in the CDP, that will apply in the LPF area, fully address the concerns raised in this point, and fully address the objectives of the **Wicklow Climate Action Plan**. For example the following objectives relating to sustainable transportation, water protection and management, flood risk management and air quality control etc will apply in the LPF area:

Sustainable Transportation Objectives CPO 12.1 CPO 12.2 CPO 12.5 CPO 12.6 CPO 12.7 CPO 12.8 CPO 12.11 CPO 12.12 CPO 12.13 CPO 12.14 CPO 12.15 CPO 12.16 CPO 12.17 CPO 12.18 CPO 12.19 CPO 12.20 CPO 12.21 CPO 12.22 CPO 12.23 CPO 12.25 CPO 12.26 CPO 12.27 CPO 12.28 CPO 12.29 CPO 12.33 CPO 12.59 CPO 12.62 CPO 12.63

Water Protection & Management Objectives CPO13.1 CPO13.2 CPO13.3 CPO13.4 CPO 13.5 CPO 13.6 CPO13.7 CPO 13.14 CPO 13.20 CPO 13.21 CPO 13.22

Flood Risk Management objectives CPO 14.01 CPO14.02 CPO14.03 CPO 14.04 CPO14.05 CPO 14.06 CPO 14.08 CPO 14.09 CPO 14.10 CPO 14.11 CPO 14.12 CPO 14.13 CPO 14.14 CPO 14.15 CPO 14.16

Air Quality objectives CPO 15.9 CPO 15.10 CPO 15.11

In the Arklow LPF itself, Climate Change is one of the three strategic objectives that have informed and shaped the LPF. The shift to a low carbon and climate change resilience is a key part of the Economic Development and Employment Strategy (Section A:2.5), and the strategies for sustainable transport (A:3.1) and managing flood risk (A:4).

Therefore no changes are recommended.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 3 Local Authority Climate Action Plan & Renewable Energy

Local Authority Climate Action Plan

The Wicklow County Council Climate Action Plan 2024-2029 (**LACAP**) was adopted on the 8th of January 2024. The Wicklow County Council LACAPs central aims are aligned with the Government's national climate objective.

Under section 10(2)(n) of the Planning and Development Act 2000 (as amended), a CDP must, when being prepared, take into account the LACAP. The preparation of the draft LPF provides a positive opportunity to support the implementation of the WCDP objectives for climate action and the Wicklow County Council LACAP.

Under the Wicklow County Council LACAP, Arklow was selected as the Decarbonising Zone (**DZ**) for Wicklow. The LPF should support the implementation of the DZ where relevant.

It is important that the Wicklow County LACAP, DZ priority areas and related actions are appropriately reflected in the policies and objectives of the draft LPF, thereby ensuring consistency and alignment between both plans.

As such, the Department welcomes the Local Authority's support of the Wicklow County Council LACAP and related actions in the draft LPF.

However, the Department considers there to be potential to provide for clearer alignment in terms of priority areas, for example, in respect of Wicklow County Council LACAP objectives:

- **ADZ BE&T** "Implement the Retrofitting Housing Programme for existing housing stock achieving a BER of B2 or cost optimal level equivalent. Provide newly constructed housing units to an A2 BER rating or in compliance with relevant guidelines within the lifetime of the Climate Action Plan".
- **8 ADZ BE&T** "Investigate district heating opportunities from the planned data centre; ensuring appropriate regard is had to planning and environmental protection considerations".
- **20 ADZ CR&T** "Promote greater uptake of solar PV in the town through promoting the microgeneration and the small scale generation scheme, where it is confirmed through a glint and glare assessment that any solar development will not have any potential glint and glare impact on sensitive receptors, or otherwise, where it is confirmed that any solar development constitutes exempted development under the Planning and Development Regulations by virtue of its size or location outside a Solar Safeguarding Zone".

Recommendation 3

The Department recommends that the LPF include further objectives and / or policies to ensure the implementation of the Wicklow County Council LACAP, DZ priority areas and related actions, thereby ensuring consistency and alignment between both Plans.

Renewable Energy

The National Development Plan 2025 (**NDP**) and the CAP25 commits to increase Ireland's proportion of electricity from renewable sources to 80% by 2030. As per our commitment under the National Energy and Climate Plan, Ireland's objective is to contribute to the Renewable Energy Directive III renewable energy target of at least 42.5% by 2030, by achieving a 43% share of renewable energy in total energy consumption by 2030.

These measure will be achieved through a combination of onshore and offshore renewable sources supported by various support schemes, including the Renewable Electricity Support Scheme (**RESS**), the Small-Scale Renewable Electricity Support Scheme (**SRESS**) and the Micro-Generation Support Scheme (**MSS**).

Small-scale and community generation will be supported via the SRESS. SRESS offers a simpler route to market for community and other small-scale renewable projects. Unlike RESS, the SRESS is not auction-based and support for projects will be provided through a guaranteed tariff. The MSS delivers a range of measures to support micro-generation (both for self-consumption and for export).

The Local Authority should note the updates to the national policy context, in particular the CAP25, including Government's renewable electricity generation targets: Solar PV Capacity targets of 8GW by 2030. Onshore wind capacity of 9GW by 2030, in addition to the commitment to supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation.

The Department notes the positive objectives of the WCDP concerning the support and promotion of renewable energy, including:

- *'To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel'.*
- *'To support and promote the development of 'Sustainable Energy Communities' and in particular to encourage and facilitate developments that are energy neutral / low emission, integrate renewable energy technology or involve local renewable energy production'.*
- *'To facilitate and support the development of solar generated electricity'.*
- *'To facilitate and support the development of small-scale electricity generation installations'.*

We also note the objective of the Local Authority to support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.

We would also ask the Council to consider the particular targets set out in Agenda 2030 regarding SDG7 - Affordable and Clean Energy.

As such, the Department welcomes the inclusion of an objective of the Council in the LPF:

- To promote the development of renewable energy projects.
- To support Eirgrid with the implementation of their Powering up Wicklow programme and facilitate the expansion and upgrading of electricity supply infrastructure serving the LPF and wider area.

It is crucial that all future development seek to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral.

Chief Executive Response

The submitter is correct that the CDP must, when being prepared, take into account the LACAP. As outlined above, the very wide range of objectives set out in the current CDP (2022-2028) and the draft LPF fully address the objectives of the **Wicklow Climate Action Plan**. In particular, the CDP has multiple objectives which support the development of renewable energy projects, district heating, and improving the sustainability performance of both existing buildings and new buildings in the County (please see responses to Items 4 and 5 below for further detail). The CDP also refers to the National Climate Action Plan (2019), which was the relevant document at the time that the CDP was being prepared, and other legislation, regulations and targets. Appendix 1 of the CDP (Development & Design Standards) confirms that any guidelines updated or new guidelines produced during the currency of the plan will be utilised in the assessment of applications.

If further objectives and / policies are required to support the latest iterations of national policy, these would need to be taken forward through the CDP, rather than the Arklow LPF, as they would apply on a county-wide basis. Any such objectives can be addressed in the next CDP, the review of which is due to commence later in 2026.

Therefore, no alterations are recommended to the Arklow LPF in order to reflect the needs of national policy and guidance.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 4 Marine Planning & Offshore Renewable Energy

Marine Planning

Land-sea interactions are an important consideration in the preparation of plans particularly plans that adjoin or have connections with the maritime area. Through effective coordination and alignment of marine and land planning, a comprehensive planning framework for development that has land sea interactions will be created.

Recommendation 4

It is recommended that the plan include a policy to facilitate land sea interactions and support sustainable marine related development in appropriate locations.

The proposed plan should be consistent with the policies and objectives of the National Marine Planning Framework (**NMPF**), which outlines the Government's vision, objectives and marine planning policies for each marine activity. The NMPF sets out the vision for Ireland's seas and oceans to be managed strategically and in a manner that supports and enables broader maritime activities and the needs of the public.

NMPF Infrastructure Policy 1 supports appropriate land-based infrastructure which facilitates marine activity (and visa versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industry should be supported.

The consideration of land-sea interactions in the plan will support the implementation of NMPF Infrastructure Policy 1, support the sectoral policies of the NMPF and the implementation of Designated Maritime Areas Plans (**DMAPs**), including for Offshore Renewable Energy (**ORE**) such as the South Coast Designated Maritime Area Plan (**SCDMAP**) for ORE and future National DMAP for ORE.

Offshore Renewable Energy

The Department notes the Local Authority's recognition of how offshore wind energy presents new opportunities for future employment development and regeneration of the Southern Waterfront Zone (B:2.2), the potential development of land-based supports to the offshore renewable energy sector (SLO2) and the Local Authority's support of further development of commercial and tourism related maritime / marine services sector and facilitate existing and future commercial port activities, including support services for offshore wind farms (Ark 27).

The development of ORE is required over the coming decade to meet the ambitious goal of 80% renewable electricity by 2030 and the CAP25 offshore wind target of 5GW by 2030. Any policies within the Proposed Variation should not undermine the policies and objectives of the:

- The Policy Statement on the Framework for Ireland's Offshore Electricity Transmission System, which relates to future development, operation and ownership of Ireland's offshore electricity transmission system.
- The Future Framework for Offshore Renewable Energy, which sets out the key actions to deliver a potential 20 GW of offshore wind capacity by 2040, and a potential 37 GW by 2050.
- Powering Prosperity – Ireland's Offshore Wind Industrial Strategy, which aims to harness Ireland's green industrial development potential in the offshore wind sector.
- The South Coast Designated Maritime Area Plan for Offshore Renewable Energy, which is Ireland's first ever spatial plan for renewable energy at sea. The SC-DMAP has been prepared in accordance with the legislative provisions of the Maritime Area Planning (**MAP**) Act, 2021, as amended and is consistent with the objectives of Ireland's NMPF, the strategic objectives of the National Development Plan (**NDP**), the Government's Offshore Wind Industrial Strategy (2024) and the Programme for Government to support balanced regional development.

County Development Plans and Local Area Plans can provide positive support and ambition for job creation through the marine economy and enable the enhancement of infrastructure and enterprise in these sectors. Local Authorities in proximity to the SC-DMAP are to align their plans with national policy for the improvement of port and harbour capacity to facilitate ORE infrastructure development. Regional level initiatives, including the Southern Regional Assembly's Ports and Harbour Strategy, are to be supported.

- The Department has commenced work on the National Designated Maritime Area Plan for Offshore Renewable Energy, which will provide a spatial planning policy framework for ORE, including spatial designations. The Proposal and Public Participation Statement was published on the 12th September 20258.

National, regional, and local actions that support further education and training to deliver research, innovation, and skills to grow the ORE sector are to be welcomed. Local authorities should also seek to maximise opportunities for the co-existence of ORE with other marine activities, including commercial fishing, seafood production and tourism while maintaining, and where possible, enhancing marine biodiversity.

Recommendation 5

Any policies within the Proposed Variation should not undermine the objective of the various plans and frameworks related to ORE.

Chief Executive Response

With respect to marine planning and in particular the support for the off-shore renewable energy sector, both the Wicklow County Development Plan and the draft LPF provide for necessary policy support for the implementation of the National Marine Planning Framework, Accelerating Ireland's Offshore Energy

Programme: Policy Statement on the Framework for Offshore Wind (2023) and the Future Framework for Offshore Renewable Energy Policy Statement (2024).

The CDP contains multiple objectives supporting the marine economy and land sea interactions, including CPO 19.1 – 19.4:

CPO 19.1 *To review and update the County Development Plan if necessary to ensure that it is consistent with the following:*

- *the National Marine Planning Framework; and*
- *the Maritime Area Planning Act.*

CPO 19.2 *To work with the Department of Housing, Local Government and Heritage and other relevant government departments and bodies on marine planning with particular reference to the following areas;*

- *the implementation of the National Marine Planning Framework;*
- *the implementation of the Maritime Area Planning Act in so far as it relates to the duties and functions of the Planning Authority;*
- *the designation of the nearshore area for County Wicklow; and*
- *the preparation of any sub-regional plans for the maritime area and nearshore area.*

CPO 19.3 *To support the development of the Marine Economy / Blue Economy sector, particularly in the renewable energy, shipping and fishing / aquaculture sectors. To support the work of the Wicklow Maritime Business Development Group and the implementation of strategies and projects related to enhancing the marine economy.*

CPO 19.6 *To support developments which provide for safety at sea, navigation safety and maritime search and rescue operations, in particular the development or expansion of port facilities, or the development of safety / navigation infrastructure in or adjacent to the maritime area.*

The CDP also includes objectives supporting the development of wind energy, both onshore and offshore:

CPO 16.05 *To encourage the development of wind energy in accordance with the County Wicklow Wind Energy Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:*

- *consideration of any designated nature conservation areas (SACs, NHAs, SPAs, SAAOs etc) and any associated buffers;*
- *consideration of collision risk species (bird and bats);*
- *impacts on Wicklow's landscape designations;*
- *particular cognisance and regard being taken of the impact on wind turbines on residential amenity particularly with respect to noise and shadow flicker;*
- *impacts on visual and recreational amenity;*
- *impacts on 'material assets' such as towns, infrastructure and heritage sites;*
- *consideration of land cover and land uses on or adjacent to the site;*
- *best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables.*

CPO 16.06 *To facilitate and support the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required and the development of Operations and Maintenance (O&M) bases as may be required.*

CPO 16.07 *To support community-based wind energy projects.*

Therefore existing objectives provide support for marine activities and therefore no changes are considered necessary in light of the issue raised.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 5 Electricity Grid

Recommendation 6

The Department recommends that the LPF should include reference to:

- Shaping Our Electricity Future 1.1, EirGrid’s updated roadmap for the development of the transmission grid out to 2030 to deliver on the 80% renewable energy targets.
- ESB’s Networks Strategy: Networks For Net Zero, which sets out ESB Networks’ role in enabling the delivery of the Government’s Climate Action Plan 2023 and supports the decarbonisation of the electricity system by 2040.

Energy Security

Action 10 of the Energy Security Framework in Ireland to 2030 (**ESF**) proposes to align all elements of the planning system to fully support accelerated renewable energy development and ensure that the local planning policy framework supports the national objectives. The ESF provides an overarching and comprehensive response to Ireland’s energy security needs. The Framework outlines the actions required and roadmap to Energy Security in Ireland.

The National Energy Security Framework (NESF) provides an overarching and comprehensive response to Ireland’s energy security needs in the context of the war in Ukraine. The NESF outlines the structures which are in place within Government to monitor and manage our energy supplies. It sets out the plans which are in place to deal with energy security emergencies should they arise and outlines out how these plans will be tested in light of the war in Ukraine. This includes shifting away from fossil fuel energy generation and use.

A key aspect of this is local, community-based approaches to renewable energy, the reduction in the reliance on the grid transmission system (through local and domestic generation) and through microgeneration.

Recommendation 7

The LPF should include objectives supporting local and community based renewable energy projects to address Government policy and strategy for sustainable, secure and affordable energy.

Chief Executive Response

The range of CDP and Arklow LPF objectives supporting renewable energy projects have been outlined several times above. In terms of the electricity grid, objectives CPO 16.8 – 16.24 of the CDP support ongoing works and improvements to the transmission grid including where it is to support renewable energy projects.

CPO 16.01 To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel.

CPO 16.02 To support and facilitate the co-location of renewable energy developments and technologies to ensure the most efficient use of land identified as suitable for renewable energy generation.

CPO 16.03 To support and promote the development of 'Sustainable Energy Communities' and in particular to encourage and facilitate developments that are energy neutral / low emission, integrate renewable energy technology or involve local renewable energy production.

CPO 16.05 To encourage the development of wind energy in accordance with the County Wicklow Wind Energy Strategy and in particular to allow wind energy exploitation in most locations in the County subject to:

- consideration of any designated nature conservation areas (SACs, NHAs, SPAs, SAAOs etc) and any associated buffers;
- consideration of collision risk species (bird and bats);
- impacts on Wicklow's landscape designations;
- particular cognisance and regard being taken of the impact on wind turbines on residential amenity particularly with respect to noise and shadow flicker;
- impacts on visual and recreational amenity;
- impacts on 'material assets' such as towns, infrastructure and heritage sites;
- consideration of land cover and land uses on or adjacent to the site;
- best practice in the design and siting of wind turbines, and all ancillary works including access roads and overhead cables.

CPO 16.06 To facilitate and support the development of off-shore wind energy projects insofar as onshore facilities such as substations/connections to the grid may be required and the development of Operations and Maintenance (O&M) bases as may be required.

CPO 16.07 To support community-based wind energy projects.

CPO 16.08 To facilitate and support the development of solar generated electricity.

CPO 16.09 To positively consider all applications for the installation of building mounted PV cells at all locations, having due regard to architectural amenity and heritage.

CPO 16.10 To support the development of commercial scale ground mounted solar PV 'Solar Farms' subject to compliance with emerging best practice and available national and international guidance¹.

CPO 16.12 To facilitate the development of off shore hydroelectricity projects insofar as onshore facilities such as substations/connections to the grid and the development of Operations and Maintenance (O&M) bases as may be required.

CPO 16.13 To facilitate the development of projects that convert biomass to gas or electricity, subject to demonstration that such projects are resource efficient having regard to carbon emissions resulting from the growth, harvesting and transport of inputs, and do not result in unsustainable climate damaging agricultural intensification.

CPO 16.14 Other than biomass installations that are location specific to the rural area, biomass conversion installations / facilities shall be located on suitable zoned industrial land in settlements.

CPO 16.15 To facilitate and support the development of small-scale electricity generation installations.

¹ It should be noted that there is currently no national guidance available on the appropriate location and design of solar farms. However there are a number of excellent examples of such guidance provided in other jurisdictions and these will be utilised in the assessment of any applications; for example 'Planning guidance for the development of large scale ground mounted solar PV systems' produced by BRE National Solar Centre and Cornwall Council in the UK.

CPO 16.16 To facilitate the exploration of geothermal energy where such development does not have a negative impact on the surrounding environment, landscape, biodiversity or local amenities.

CPO 16.17 To ensure that any proposal for geothermal technologies or any other subsurface exploration does not impact on groundwater quality.

CPO 16.18 To support the development and expansion of the electricity transmission and distribution grid, including the development of new lines, pylons and substations as required.

CPO 16.19 To facilitate planned growth and transmission / distribution of a renewable energy focused electricity generation across the main demand centres.

CPO 16.20 To support roll-out of the Smart Grids and Smart Cities Actions enabling new connections, grid balancing, energy management and micro grid development.

CPO 16.21 To facilitate high energy demand development only at appropriate locations, most accessible to the National Grid.

CPO 16.23 To support and facilitate the development of landing locations for off shore generated wind energy and for any cross channel power interconnectors.

CPO 16.24 Proposals for the undergrounding of cables should demonstrate that environmental impacts including the following are minimised:

- *Habitat loss as a result of removal of field boundaries and hedgerows by topsoil stripping;*
- *Short to medium term impacts on the landscape where, for example, hedgerows are encountered;*
- *Impacts on underground archaeology;*
- *Impacts on soil structure and drainage; and*
- *Impacts on surface waters as a result of sedimentation.*

Therefore, it is considered unnecessary to introduce additional objectives into the Arklow LPF.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 6 Built Environment and Heating, Compact Growth and District Heating

Built Environment and Heating

The CAP25 includes measures to support the electrification of heating by strengthening our existing Building Regulations and implementing an ambitious National Residential Retrofit Plan. Targets set are 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030. The National Residential Retrofit Plan commits the Government to retrofit 120,000 dwellings to B2 or cost optimal by 2025 and 500,000 by 2030.

The Department notes policy of the Eastern and Midland Regional Assembly Regional Spatial and Economic Strategy (RSES) 2022-2032 and the WCDP, which states:

- *'Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings'.*
- *'To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel'.*
- *'To facilitate retrofitting of existing building with heat saving devices and installations, where permission is required for such works'.*

As such, the Department welcomes the inclusion of an objective of the Council in the LPF to promote energy efficiency.

Recommendation 8

The Department recommends that the Local Authority continue to implement policies such as the Social Housing Energy Efficiency retrofit programme, to support the ambitions of the National Residential Retrofit Plan, in particular, the development of the electrification of heating, having regard to the CAP25, WCDP, and the RSES.

This also aligns with SDG targets relating in particular to SDG 11 – Sustainable Cities and Communities and SDG 7 – Affordable and Renewable Energy.

Compact Growth and District Heating

When preparing the draft LPF, due regard should be given to the ambition of the National Planning Framework, RSES and WCDP which requires the achievement of compact growth and explicitly recognises the potential for such compact growth to facilitate the development of low carbon district heating.

Examples include:

- National Planning Framework: *'District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland's GHG emissions'*.
- Regional Policy Objective 7.38: *'Local authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in local authority areas shall be carried out and statutory planning documents shall identify local waste heat sources'*.
- CPO 16.34: *'To support the development of district heating systems, particularly those generating heat from renewable sources.'*

Therefore, it is considered that no amendments to the Arklow LPF in order to reflect the needs of national policy and guidance including district heating derived from waste heat, and geothermal energy where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. As such, policies in support of same are encouraged in the draft LPF. The SEAI Centre of Excellence for district heating has been established and is available to provide guidance and support in this regard.

Recommendation 9

The Department recommends that the Local Authority examine the potential of district heating, including district heating derived from waste heat and geothermal energy, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies, having regard to the CAP25, RPO 7.38 of the RSES, CPO 16.34 of the WCDP, Wicklow County Council LACAP, NSO 9 of the NPF the National Heat Study, and the Government's Policy Statement on Geothermal Energy for a Circular Economy. As such, policies in support of same are encouraged in the draft LPF.

Chief Executive Response

As outlined above, the very wide range of objectives set out in the CDP and the LPF fully address the objectives of the **Wicklow Climate Action Plan**. In particular, the CDP has multiple objectives which support the development of renewable energy projects, district heating, and improving the sustainability performance of both existing buildings and new buildings in the County, in particular the following objectives:

CPO 16.01 To support and facilitate to the highest degree possible the development of alternative and renewable sources of energy, particularly in the generation of electricity / heating and for use as transport fuel.

CPO 16.25 To require all new developments during the design process to incorporate sustainable electricity technologies in accordance with Part L of the Buildings Regulations and as part of any application for permission, to demonstrate how these requirements will be met.

CPO 16.26 To facilitate retrofitting of existing buildings with electricity saving devices and installations, where permission is required for such works.

CPO 16.32 To require all new developments during the design process to incorporate sustainable heating technologies in accordance with Part L of the Buildings Regulations and as part of any application for permission, to demonstrate how these requirements will be met.

CPO 16.33 To facilitate retrofitting of existing building with heat saving devices and installations, where permission is required for such works.

CPO 16.34 To support the development of district heating systems, particularly those generating heat from renewable sources.

It is not considered necessary to re-state the existing objectives and standards that are already provided for in the CDP regarding construction management in this LPF as they directly apply already in the LPF area.

In addition, it is not considered necessary to overload local plans with references to every possible guidelines produced by another state agency when these will be considered as a matter of course and good practice in the operations of the Council. The CDP refers to the national Climate Action Plan (2019), which was the relevant document at the time that the CDP was being prepared, and other legislation, regulations and targets. Appendix 1 of the CDP (Development & Design Standards) confirms that any guidelines updated or new guidelines produced during the currency of the County Development Plan/LPF will be utilised in the assessment of applications.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 7 Circular Economy and Waste Management

Circular Economy

The Circular Economy is an alternative to the predominant 'take-make-waste' linear economic model. Meeting Ireland's climate action targets requires a transition to a circular economy which protects and restores our environment through sustainable resource use.

The Circularity Gap Report for Ireland in 2024 indicates that our Circularity Metric stands at 2.7%, meaning that over 97% of the materials flowing through our economy come from virgin sources. The report also identifies key sectors and material flows, and highlights opportunities for systemic change.

50% of the world's total greenhouse gas emissions come from resource extraction and processing. Reducing the resource intensity of our economy is, therefore, an essential component of achieving net zero emissions. The challenge Ireland faced was around creating a policy or framework that would radically shift focus back to the start of the product life cycle, to focus on prevention and designing out waste, and to effect behavioural

change at an individual, household, and business level. This policy is set out in the government's Waste Action Plan for a Circular Economy, and the first Whole of Government Circular Economy Strategy 2022-2023. The Circular Economy and Miscellaneous Provisions Act 2022 (Circular Economy Act 2022) underpins Ireland's shift from 'take-make-waste' towards a circular economy by defining the circular economy in Irish law for the first time, and provides the legal basis for a number of actions to be delivered including, for example, providing waste authorities with new tools to tackle illegal dumping.

The first Whole of Government Circular Economy Strategy marked a significant milestone in Ireland's transition towards greater circularity. The second iteration of the Strategy is due for publication in 2025 and will include targets and actions for specific sectors as mandated for in Section 7 of the Circular Economy Act 2022.

The Environmental Protection Agency's Circular Economy Programme 2021-2027, established in 2021, is the driving force in Ireland's move to a circular economy by businesses, householders, and the public sector. The National Waste Management Plan for a Circular Economy, published in 2024, further enhances the regulatory framework by setting out the specific targets and actions which need to be taken over the period 2024 to 2030 to help achieve the circular transition.

The Council is requested to consider all aspects of how it can support the transition to a circular economy in the preparation of the draft LPF and encourages the Local Authority to support and promote circular economy principles.

The Department notes the objective of the Local Authority in the WCDP, CPO 9.21, which states:

'To encourage and facilitate the 'circular economy' and the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation'.

The Department asks the Council to have regard to the targets set out in the SDGs, in particular in relation to SDG12 – Responsible Consumption and Production.

Recommendation 10

The Local Authority should support circular economy principles in the draft LPF and implement policy for same.

Waste Management

The Department draws the Local Authority's attention to the new guidance in respect of construction waste management, titled *"Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects"*. The purpose of these guidelines is to provide a practical approach to construction and demolition (C&D) which is informed by best practice in the prevention and management of C&D wastes and resources from design through to construction and deconstruction.

The Department advise the Local Authority to consult with their respective Regional Waste Management Planning Office regarding development of the LPF and to take into account the National Waste Management Plan for a Circular Economy.

The Department asks the Council to have regard to targets set out in the SDGs, in particular in relation to SDG 11 – Sustainable Cities and Communities and SDG12 – Responsible Consumption and Production.

Recommendation 11

The LPF should have regard to the guidance *"Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects"* and give effect to them through the objectives of the plan.

The Department encourages the Local Authority to consider the following when finalising the LPF:

- The Government approved Policy Statement on Mineral Exploration and Mining which puts in place a clear and sustainable policy framework that can play a role in Ireland's transition to a circular economy and net-zero greenhouse gas emissions. The importance of historic mines for circular economy, geoheritage, tourism and amenity uses, particularly those under local authority ownership, is an area of great potential. These resources can and should be positively developed, and incorporation into local authority plans, with reference to current government policy, would aid in the development of timely rehabilitation plans for such sites.
- Policy Statement on Geothermal Energy for a Circular Economy which outlines the regulatory framework, highlights the requirement for meaningful engagement with the public, and for further work in the collection of data on Ireland's geothermal resources.

The Department notes the objective of the Local Authority in the WCDP, CPO 16.16, which states:

'To facilitate the exploration of geothermal energy where such development does not have a negative impact on the surrounding environment, landscape, biodiversity or local amenities'.

Recommendation 12

We would encourage the Local Authority to consider the policy where relevant for the LPF area.

Chief Executive Response

As set out above, it is not considered necessary to re-state the existing objectives and standards that are already provided for in the CDP regarding construction management in this LPF as they directly apply already in the LPF area. In addition, it is not considered necessary to overload local plans/frameworks with references to every possible guideline produced by another state agency when these will be considered as a matter of course and good practice in the operations of the Council.

Support for circular economy is included in the Strategic County Outcomes of the CDP:

SCO7 Climate Resilience & the Transition to a Low Carbon Economy

Support the transition to low carbon clean energy by facilitating renewable energy use and generation at appropriate locations and supporting the development of off-shore renewable energy enabling infrastructure especially at ports and harbours. Facilitate the sustainable management of waste including the circular economy. Restrict development in areas that are at risk of flooding and protect the natural landscape and biodiversity.

This is reinforced by objective CPO 9.21:

CPO 9.21 *To encourage and facilitate the 'circular economy' and the development of 'green' industries, including industries relating to renewable energy and energy-efficient technologies, material / waste recycling and conservation.*

Attention is drawn to provisions of Chapter 15 and the 'Development & Design Standards' of the Wicklow County Development Plan which state:

CPO 15.1 To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site.

Appendix 1 of the CDP (Development & Design Standards) also considers waste management:

1.4.6 Construction Management

All construction sites shall be appropriately managed to ensure that environmental emissions are strictly controlled. Where necessary (such as for larger scale developments or developments in ecologically sensitive areas) this will be enforced by requiring (by planning condition) the agreement and implementation of a 'construction environmental management plan' (CEMP), which should set out, at a minimum, the various best practice construction measures/mechanisms that will be put in place during the construction phase to avoid or mitigate the impacts of: construction traffic, waste, noise, lighting, dust, storm water run-off etc, on adjoining residences and properties, on existing biodiversity, public roads etc.

In particular, such plans will set out:

- Construction programme for the works;
- Hours of operation;
- A traffic management plan;
- Noise and dust mitigation measures;
- Details of construction lighting;
- Waste minimisation and management plan, including recycling / re-use of waste where possible (in accordance with circular economy principles);
- Measures for the protection of natural features, including (but not limited to) mature trees and hedgerows, protected species, ecological corridors and watercourses. A Construction Manager will be required to be appointed to liaise directly with the various sections of the Local Authority and that should include a biodiversity officer, should one be appointed.

With respect to waste management, draft plans / frameworks are prepared within the local authority as a collaborative exercise across all functions and in this regard, the waste management team were consulted in the preparation of this LPF. This exercise determined that no localised waste management issues were arising in the LPF area that required more localised planning policy.

With regard to geoscience policy, CPO 9.54 supports the development of related and spin-off industries of the extractive industry, including tourism. As the submission notes, support is already provided by the CDP for geothermal energy projects.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 8 Transport

The CAP25 commits the Government to reducing transport emissions by 50% from 2018 emissions rates. To facilitate the reduction in greenhouse gas emissions (GHG emissions), CAP25 supports a significant increase in sustainable transport trips, through enhanced land-use planning, public transport, active travel, vehicle efficiency, 20% reduction in total vehicle kilometres, 50% reduction in fuel usage, fleet electrification and biofuels.

We note the sustainable mobility objectives of the Local Authority with regard to reducing the demand for vehicular travel, public transport and active travel. We encourage the Council to refer to Agenda 2030, with particular consideration of the SDG targets relating to sustainable transport, within SDGs 3, 7, 8, 9, 11, 12 and 14.

Recommendation 13

The Local Authority is requested to consider the measures within the CAP25 and sustainable transportation objectives of the WCDP relating to sustainable mobility and reducing the demand for transport journeys by private vehicles (Avoid-Shift -Improve Framework) through more effective land use and transport planning integration and compact growth principles when drafting the LPF.

Chief Executive Response

The Arklow Local Transport Plan has considered the Climate Action Plan 2025, the Wicklow Climate Action Plan and a range of national policies and requirements with regard to sustainable transportation. Its recommendations have been developed in response to these requirements.

As outlined in the response to the submissions from the Office of the Planning Regulator and the National Transport Authority, the LTP has in-turn directly informed the policy objectives within the LPF, which includes specific objectives supporting sustainable transport projects. Nevertheless, the CE recommends that an additional objective be included in Part B:8 (Physical Infrastructure) of the LPF providing policy support for the recommended measures in the LTP. The CE is also recommending that the LTP be updated once the LPF has been finalised to include modal share targets.

Chief Executive Recommendation

Alter the LPF as follows:

Section B:8 Physical Infrastructure

Add new objective

ARK-XX To support and promote the implementation of the recommended measures set out in the Local Transport Plan.

Alter the **Local Transport Plan**:

The Local Transport Plan (LTP) will be updated once the Local Planning Framework has been finalised and adopted. The CE recommends that the updated version of the LTP includes modal share targets.

Item 9 Land Use, Land Use Change and Forestry

The Department would like to bring to the Local Authority’s attention the call for the integration of bioeconomy policy development into the planning framework, under Action 5.1 of the Bioeconomy Action Plan 2023 – 2025. This action seeks to enhance bioeconomy governance in Local Authorities and improve policy making for the bioeconomy to address climate action, green economy, enterprise, and economic development.

Following the adoption of the Nature Restoration Law, all Member States must produce their own Nature Restoration Plan to show how they will achieve the targets set out in the regulation. The Nature Restoration Action Plan is currently being drafted.

We would ask the Council to also again consider the related SDG targets outlined in Agenda 2030, in particular those set out in SDG 15 – Life on Land.

Recommendation 14

The Local Authority is requested to consider the Actions of the Bioeconomy Action Plan 2023-2025 including Action 5.1, as relevant for the plan area, when drafting the LPF, and consider the related SDG.

Chief Executive Response

The Wicklow County Development Plan directly address the 'bioeconomy' in particular in Chapters 9 and 16 of the CDP. The County Development Plan references national plans and strategies for this sector and the objectives support the delivery of same at the County level.

As set out previously, it is not considered necessary to re-state the existing objectives that are already provided for in the CDP for all in this LPF as they directly apply already in the LPF area. In addition, it is not considered necessary to overload local plans with references to every possible guideline produced by another state agency when these will be considered as a matter of course and good practice in the operations of the Council.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 10 Air Quality

Air Quality has a significant impact on the health of local communities. The Department encourages the Local Authority to have regard to the Clean Air Strategy for Ireland, bearing in mind the impacts of measures adopted in the draft LPF on current and future air quality.

There are specific limits on air pollution for each station across the country which are set out in the Clean Air Strategy and the new EU Air Quality Directive . The Local Authority is requested to have regard to limits on air pollution and ensure that any measures set out in the LPF will not negatively impact on future air quality. The Local Authority is requested to be mindful if any potential measures are required to meet these air pollution limits in future plans.

Air quality data is available from EPA at www.airquality.ie. This gives details of the locations of all monitoring stations currently in operation, along with real-time and historic data from each station.

Chief Executive Response

As set out above, the majority of policies, objectives and development standards that will apply in the Arklow LPF area are already determined in the Wicklow CDP and all efforts shall be made to minimise repetition of County Development Plan objectives in this LPF. Therefore it is not considered necessary to re-state the existing objectives and standards that are already provided for in the County Development Plan regarding air quality in this LPF as they directly apply already in the LPF area.

In this regard, the Wicklow CDP set out the following objectives:

***CPO 15.9** To regulate and control activities likely to give rise to emissions to air (other than those activities which are regulated by the EPA).*

***CPO 15.10** To require proposals for new developments with the potential for the accidental release of chemicals or dust generation, to submit and have approved by the Local Authority construction and/or operation management plans to control such emissions.*

CPO 15.11 *To require activities likely to give rise to air emissions to implement measures to control such emissions, to undertake air quality monitoring and to provide an annual air quality audit.*

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 14 Conclusion

We would be grateful if Wicklow County Council would take these matters under consideration in the drafting of the Draft Arklow Local Planning Framework.

Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of Climate, Energy and the Environment relevant to the preparation of this plan.

Officials can provide support to the Local Authority in the following areas:

- Climate Action, Engagement and Adaptation
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- The Circular Economy
- Environmental Policy and Governance
- Waste and Natural Resources (including geosciences)
- UN Agenda 2030 and the Sustainable Development Goals (SDGs)
- Please direct any requests for further consultation to PlanningNotifications@dcee.gov.ie

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.1.14 Iarnród Éireann

No.	Link to submission
67	Iarnród Éireann

Item 1 Preamble

The All-Island Strategic Rail Review (A-ISRR) published by Government in July 2024 is the basis for investment in railways across the island. It is positive to see the acknowledgement and references to the A-ISRR contained in the draft LPF and the supporting ambition to upgrade the rail service in line with Arklow's planned growth. The A-ISRR notes that Arklow (Greystones to Rosslare) is poorly served by passenger rail services. The review suggests that the best way forward for boosting connectivity in the South East of Ireland is to introduce an hourly service between Wexford and Greystones, with DART services to be extended to Wicklow, see **Figure 1**.



Figure 1: All-Island Strategic Rail Review South East of Ireland

Chief Executive Response

Noted

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

Item 2 Iarnród Éireann Observations

Iarnród Éireann have reviewed the consultation documents available online and make the following observations in relation to the draft LPF.

Opportunity Sites

- **Opportunity Site 1 The Alps** – The site is bound to the west by the Dublin Rosslare rail line. The planning authority should consider the opportunity to protect railway corridor boundaries for future rail infrastructure improvements as recommended in the A-ISRR.

Specific Local Objectives (SLO)

- **SLO 3 Abbeylands and Tinahask Upper** – This site is bounded to the west by the railway line. The planning authority should consider the opportunity to protect railway corridor boundaries for future rail infrastructure improvements as recommended in the A-ISRR. Iarnród Éireann recommends early engagement and consultation with regards to possible works to the railway bridge and access road.

- **SLO 4 Tinahask Upper Money Little and Money Big** – This site is bounded to the west by the railway line. The planning authority should consider the opportunity to protect railway corridor boundaries for future expansion including electrification as recommended in the A-ISRR. It is noted that an objective to improve the railway bridge is included in this SLO. Iarnród Éireann recommends early engagement and consultation with regards to possible works to the railway bridge and access road.

Arklow Physical Infrastructure Objectives

- **ARK 73** – Iarnród Éireann suggests that early consultation and engagement should be included in the long-term objective of providing a new walking and cycling link to Vale Road utilising the old railway bridge north of Glendale.
- **ARK 77** – Iarnród Éireann supports measures such as PY17 and PY18 to improve pedestrian permeability to access rail services.
- Iarnród Éireann suggests that objective **ARK 78** could be improved by adding an objective to protect railway boundaries from development that would impede A-ISRR recommendations and future improvements to the rail line such as passing loops, twin tracking or electrification.

Chief Executive Response

The County Development Plan already contains objectives protecting the railway line and protecting Iarnród Éireann assets:

CPO 12.23 *To ensure the continued and long term operation of and improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements. In particular:*

- *to ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss;*
- *to resist any development within 20m of the railway line;*
- *to resist demolition or removal of any former train station structures or apparatus, other than for safety reasons; and*
- *to require any development proposals in the vicinity of former train stations to be so designed to facilitate future access to the station and to reserve adequate space for future car parking.*

CPO 12.23 safeguards the existing railway and ensures that its upgrade in the future will not be prejudiced by development on adjoining land. Therefore it is not considered necessary to update Opportunity Site 1, SLO 3, SLO 4, ARK 73 and ARK 78, or introduce other additional policy objectives to the Arklow LPF.

Chief Executive Recommendation

No change to draft Arklow LPF/Variation.

4.2 GENERAL SUBMISSIONS

4.2.1 Submissions related to Part 1 and Part 2 of the Proposed Variation (proposed alterations to Wicklow County Development Plan)

Part 1:1 Chapter 1

No submissions

Part 1:2 Chapter 3

No.	Name	Issues Raised
64	Cairn Homes Properties Ltd 163518	<p>Volume 1, Chapter 3 of the CDP is proposed to be varied to make reference to the NPF Implementation Guidelines.</p> <p>This submission raises a fundamental concern regarding the failure to apply the NPF Implementation Guidelines, which requires Planning Authorities to vary development plans immediately to align the zoning provisions with the population and housing targets set out in the Revised NPF.</p> <p>The Revised NPF sets out an increased national housing delivery target that also significantly increases the annual housing requirements for Wicklow and negates the need for differentiating between tier 1 and tier 2, while taking into account infrastructural constraints.</p> <p>The revised housing targets for Wicklow result in an increased demand of 47% of units. Applying and referring to the current outdated core strategy is at odds with the current NPF. Based on this, adopting the draft LPF in advance of revising and varying the County Development Plan, risks misalignment of the plan with national policy.</p>
Chief Executive's Response		
<p>This submission has referred to the publication of the "<i>NPF Implementation: Housing Growth Requirements</i>", in July 2025, which included new housing targets for Wicklow, which has necessitated a review of the CDP beyond the remit of Variation 5 itself. Wicklow County Council's (WCC) implementation of these requirements, and how it affects the Arklow LPF is outlined below:</p> <p>NPF Implementation - Revised Housing Targets – Proposed Variation No. 6</p> <p>In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.</p> <p>As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, the variation also proposes to introduce new Core Strategy Objectives including:</p>		

“Core Strategy Objective 1

All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 with submissions invited. The Chief Executive’s Report on the submissions received to the proposed variation was issued to the Elected Members in February 2026 for their consideration. The Variation may be made following on from this or Material Alterations may be proposed.

In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from a growth of 1,221 units 2016-2022 as set out in current County Development Plan, to an increase of 4,056 units 2016-2031).

Draft Arklow LPF: Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From **Section 3.0: Introduction**

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From **Section 3.4: Zoning**

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.

In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

Part 1:3 Chapter 17

No submissions

Part 1:4 Chapter 19

No submissions

Part 2:2 Introduction to Local Planning Frameworks

No.	Name	Issues Raised
64	Cairn Homes Properties Ltd 163518	<p>Rational for the LPFs</p> <p>The rationale for the LPF Frameworks as set out part 6.1 'Introduction to Local Planning Frameworks' is sensible. It recognises that the objective of the LPF is to define a robust policy framework for development and investment to proceed, but planning authorities are not in a position to control the specifics of what takes place, where and when. The LPF should in principle establish a strong level of confidence in the development of the town.</p> <p>Timeframe</p> <p>LPFs are framed in accordance with the development horizon of the CDP. This means that there is an expectation that land use policies are to be implemented between 2026 and 2028, the lifetime of the CDP. In this context, the adoption of a tiered approach to zoning is counterproductive.</p>
<p>Chief Executive's Response</p>		
<p>Rational for the LPF – Noted</p> <p>Timeframe</p> <p>Section 3.5 of the County Development Plan (as varied) states the following:</p> <p><i>In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.</i></p> <p><i>In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy population and housing targets set out in the County Development Plan at the time of adoption of the LAP/ LPF, with flexibility in the zoning provisions to ensure that (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise and (b) the LAPs/ LPFs do not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation, with particular regard to the new housing targets for County Wicklow set out in the 'NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities' issued by the Minister under Section 28 of the Planning & Development Act (July 2025).</i></p> <p>The CDP has a timeframe up to 2028 but a 'horizon' up to 2031 and the LPF, as a variation to the CDP, will have a similar horizon. WCC does not expect that the plan will be fully implemented by 2028. As detailed above, the phased approach to zoning will be removed if Proposed Variation No. 6 to the County Development Plan is adopted.</p>		
<p>Chief Executive's Recommendation</p>		
<p>No change to draft Arklow LPF/Variation.</p>		

4.2.2 Submissions related to Draft LPF (Part A) – Strategy

PART A STRATEGY

Part A.1 Introduction

No submissions

Part A.2 County Development Plan Strategy for Arklow

Part A.2.0 STRATEGIC GOALS

No.	Name	Issues Raised
55	Cllr Peir Leonard 150524	<p>Vision and Strategic Approach</p> <p>The submitter outlines that the LPF must prioritise a set of clear, coordinated actions that place people, place, and sustainability at the heart of Arklow’s regeneration. A heritage-led and maritime-focused approach should guide the town’s renewal:</p> <ul style="list-style-type: none"> ▪ Harbour regeneration: Restore the harbour as a vibrant working and recreational waterfront, strengthening links between maritime, tourism, and cultural economies. ▪ Main Street revitalisation: Focus investment on making Main Street an attractive, accessible, and thriving mixed-use destination, encouraging new businesses, cafés, and evening activities. ▪ Civic and cultural hub: Establish a new centre for performance, art, and community events, celebrating Arklow’s identity as a creative, musical, and inclusive town. ▪ Sustainable growth: Leverage opportunities in renewable energy, offshore wind, and technology, creating a decarbonised coastal economy. <p>By linking its maritime past with a green, innovative future, Arklow can once again become a destination of pride, energy, and opportunity for residents, visitors, and future generations.</p> <p>Making Arklow</p> <p>The submitter requested that the Arklow LPF draw on the insights of the Making Arklow community research initiative, the key themes of which were:</p> <ol style="list-style-type: none"> 1. Transparency and Inclusivity 2. Town Centre Regeneration 3. Community and Cultural Spaces <ol style="list-style-type: none"> a. Youth and Belonging b. Food and Local Enterprise c. Neurodiversity and Accessibility 4. Tourism and Identify 5. Business and Employment 6. Communication and Collaboration 7. Traffic

		With regard to planning and regeneration in particular, the consultation response called for the prioritisation of town centre and harbour regeneration, the creative reuse of vacant buildings, and the integration of green and public spaces. New infrastructure proposals should be sequenced around community and cultural revitalisation.
36	Keith Scanlon 084456	The submitter requests that the results of the Making Arklow public engagement initiative be considered.
Chief Executive's Response		
<p>The CE welcomes these comments and commends the engagement undertaken by the Making Arklow team.</p> <p>It is important to be aware that the Arklow LPF is a land use framework rather than an 'action plan' and that all of the excellent suggestions detailed in the submissions are supported by the policies and objectives of both the County Development Plan and the LPF.</p> <p>The CE agrees that the planning framework for the town should have heritage and maritime culture at its heart. While the submitters have selected this section of the LPF as the relevant issue, the issues are better dealt with under each specific section of this report. Each of the points raised are considered in detail in the relevant sections of the CE report to follow.</p>		
Chief Executive's Recommendation		
No change to Proposed Variation / draft LPF.		

Part A.2.1 COUNTY DEVELOPMENT PLAN CORE STRATEGY

No.	Name	Issues Raised
55	Cllr Peir Leonard 150524	Community Development Strategy: The submitter requests that 'allotments and community gardens' be added to the description of the Community Development Strategy.
Chief Executive's Response		
<p>Table A:1.1 outlines the key elements of the Wicklow County Development Plan 'Core Strategy' as they relate to Level 3 settlements such as Arklow. The content of the Community Development Strategy cited is taken from CDP Table 7.1 (Community Facilities Hierarchy Model) which does not refer to allotments and community gardens. Therefore it would not be appropriate to update LPF Table A.1.1 to include this text as it would not accurately reflect this part of the CDP.</p> <p>It should however be noted that the County Development Plan Objective CPO 7.49 expressly supports and facilitates the development of allotments and community gardens while the draft LPF supports the provision of allotments on land zoned OS1 (Open Space). Accordingly, additional policy support for allotments and community gardens is not considered to be necessary in the Arklow LPF.</p> <p>CPO 7.49 <i>To support and facilitate the development of allotments and community gardens, of an appropriate scale, on lands which meet the following criteria:</i></p> <ul style="list-style-type: none"> ▪ <i>land situated within or immediately adjacent to the edge of towns/villages;</i> ▪ <i>land that is easily accessible to the residents of a particular town or village;</i> ▪ <i>where an adequate water supply can be provided;</i> ▪ <i>where adequate road infrastructure and access exists/can be provided; and</i> ▪ <i>where adequate parking facilities can be provided.</i> 		
Chief Executive's Recommendation		
No change to Proposed Variation / draft LPF.		

Part A:2.3 TOWN CENTRE DEVELOPMENT

No.	Name	Issues Raised
37	Brian Brennan TD 091304	<p>The submission references parts A:2.3 and A:3.2 with the following issues;</p> <p>Town Centre Development</p> <ul style="list-style-type: none"> ▪ The submitter states that the redevelopment of Arklow Main Street and surrounds should be the LPF's highest priority. It is submitted that all available mechanisms, incentives, grants and deterrents must be utilised to ensure that the Main Street is brought back to life, providing an appropriate blend of retail, hospitality, residential and recreational space <p>Sustainable Transportation</p> <ul style="list-style-type: none"> ▪ The submitter puts forward that the key to sustainable transportation in Arklow is the delivery of a second vehicular bridge between the 19 Arches and the M11 bridge to the west, continuing onto the Western Distributor Road which would have a game-changing impact on the town centre, removing congestion, improving safety for cyclists and pedestrians and open huge possibility for a vibrant and active town centre. ▪ The submitter points out that the project has been re-evaluated as a long-term option in the Draft LTP due to the requirement of "<i>further feasibility and environmental/ ecological studies (particularly as the Arklow town marsh is a pNHA and the principal wetland area in Arklow), as well as stakeholder and traffic/transport assessment would be required before such a project could be progressed</i>". The submitter would urge that these studies and assessments be conducted as a matter of priority in order to allow for progression of this project at the very least in the medium term.
Chief Executive's Response		
<p>While the submitter has selected this section of the LPF as the relevant issue, the issues are better dealt with under each specific section of this report (sections B:1 and B:8 respectively). The points raised are considered in detail in the relevant sections of the CE report to follow.</p>		
Chief Executive's Recommendation		
<p>No change to Proposed Variation / draft LPF.</p>		

Part A:2.4 POPULATION AND HOUSING

No.	Name	Issues Raised
32	Tom & Pat Redmond 164216	<p>The submitters request that the Planning Authority:</p> <ul style="list-style-type: none"> Review and update the housing yield allocations for Arklow to ensure that they are evidence-based and aligned with the latest NPF (including the new Ministerial housing target guidelines), RSES and ESRI growth projection. It is suggested that the CDP Core Strategy should first be updated to align with the NPF Implementation Guidelines (July 2025) and Census 2022 data, before the draft LPF is adopted. Section 2.3 and Objective 2 of the Guidelines specifically require the Planning Authorities to address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement i.e. Wicklow County Council should ensure that at the least, a minimum of lands zoned to accommodate 3,102 units per annum for the lifetime of current County Development Plan Section 2.4 of the Guidelines require Planning Authorities to prepare a ‘Settlement Capacity Audit’ to identify lands with development potential and zone lands accordingly Housing supply could be constrained by taking housing allocation figures as a maximum, as long-standing market barriers and on-site constraints are not often adequately considered in the conversion rates of permitted houses to completed and occupied units It is illogical and procedurally inefficient to adopt an LPF grounded in outdated population and housing figures, only to later have to revisit and vary both the CDP and every subsequently adopted LAP/LPF to bring them into alignment with the updated national and regional targets Given current commencement rates, unit delivery will fall far short of the targets within the Core Strategy. A more flexible and evidence-led approach to the release of RN2 lands should be adopted.
45	Lowick Homes 120525	The submitter request that the housing targets set out in the Draft Local Planning Framework are revised upwards to reflect the National Planning Framework.

Chief Executive’s Response

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through **Variation No. 6**. This Variation No. 5 does not propose wider changes to the CDP other than those needed to establish the new land use framework for Arklow. The publication of the “*NPF Implementation: Housing Growth Requirements*” in July 2025, which included new housing targets for Wicklow, has necessitated a review of the CDP beyond the remit of Variation 5 itself. WCC’s implementation of these requirements, and how it affects the Arklow LPF is outlined below:

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, Proposed Variation 6 also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1: All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive’s Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE’s Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From Section 3.0: Introduction

Whether zoning objectives are outlined in this development plan or in subsidiary local plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local plan

From Section 3.4: Zoning

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF.

In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provide flexibility in the zoning provisions to ensure that:

- the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (e.g. as are proposed by Proposed Variation No. 6).

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an equal footing to P1 lands, and the P2 sequencing objective (ARK18) in the Arklow LPF will cease to have effect. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to become Priority 1.

With regard to a Settlement Capacity Audit, a comprehensive assessment of existing infrastructure, water supply and waste management systems to determine the capacity of proposed zoned land has been undertaken as part of the development of the LPF.

Chief Executive's Recommendation

No change to Proposed Variation / draft LPF.

Part A.3 Factors Influencing future Development Options

No submissions

Part A.4 Overall Strategy

No.	Name	Issues Raised
66	Jonathan O'Toole 165620	The submitter notes that point 11 of the LPF's Overall Strategy (A:4) seeks to protect environmental sites from adverse impacts from any new development, in particular public transport proposals. The submitter considers that the LPF should focus its resources on improving the existing pedestrian routes and public realm instead.
Chief Executive's Response		
<p>Active travel and improvements to pedestrian routes and public realm are considered further in Section B:8 (Physical Infrastructure) of this CE Report.</p> <p>The CE considers that improving Arklow's infrastructure and protecting the environment are complementary objectives, which is reflected in the wording of Point 11 of the Overall Strategy:</p> <p><i>11. To ensure that Arklow Town Marsh, Arklow Sand Dunes and Arklow Rock (proposed Natural Heritage Areas) and other environmentally sensitive sites are protected from adverse impacts arising from any new development and to carefully manage and control the extension of existing development in proximity to these areas. In particular transport proposals which traverse or infringe on the Arklow Town Marsh pNHA, shall be subject to a full Ecological Impact Assessment which fully assesses the potential ecological and environmental impacts of any such proposal on the Marsh during both the construction phase and operational phase of any such proposal.</i></p>		
Chief Executive's Recommendation		
No change to Proposed Variation / draft LPF.		

4.2.3 Submissions related to Draft LPF (Part B:1) – Town Centre Regeneration

PART B.1.0 ARKLOW TOWN CENTRE DERELICTION/VACANCY

No.	Name	Issues Raised
1	Adrian 220425	The submitter suggests shop front improvements are necessary and focus should be dedicated to increasing businesses on main street.
11	Bernard Fox 145338	The submitter requests the LPF: <ul style="list-style-type: none"> ▪ Prioritise reviving Main Street and Bridge Street through targeted reuse of vacant buildings, encouraging mixed retail, dining and cultural uses ▪ Introduce incentives for upper floor living and shopfront improvement grants to attract people and investment back into the town
22	Elizabeth Battye 183236	It is suggested the LPF permit access to over shop residential opportunities. It is suggested that an additional objective be inserted to ARK 3: <ul style="list-style-type: none"> ▪ <i>Traditional shop fronts should be retained, reinstated and refurbished. Following the An Taisce report on the derelict state of Arklow Main Street, efforts should be made to find funding to guide and assist with the costs of improving the facades of retail premises. The removal of all exterior metal shuttering on retail premises should be prioritised by a task group comprising Arklow Municipal district, Arklow Town Team and WCC Planning department, with a one-year deadline for completion.</i>
23	Aleksandra Chromik 210440	The submitter raises concerns about the poor condition of the buildings on the main street.
37	Brian Brennan TD 091304	The submitter states that the redevelopment of Arklow Main Street and surrounds should be the LPF's highest priority. It is submitted that all available mechanisms, incentives, grants and deterrents must be utilised to ensure that the Main Street is brought back to life, providing an appropriate blend of retail, hospitality, residential and recreational space.
41	Cecil and Julie Alexander 100917	The submitters put forward that the life and heart of any town is its centre and local retail businesses and over the years Arklow Town Centre has been allowed to die resulting in many closed retail premises and derelict premises.
55	Cllr Peir Leonard 150524	The submitter suggests the LPF must focus investment on making Main Street an attractive, accessible and thriving mixed-use destination, encouraging new businesses, cafes and evening activities. The following new objectives are suggested: <i>ARKX - Provide support for reinstatement (financial & technical) of vacant units above shops for residential use to bring people back living in town centre thus increasing safety and vibrancy</i> <i>ARKXX - Retain character of main street by limiting backland / main street development to be no higher than historic ridge line so as to preserve profile of townscape.</i> <i>ARKXXX - To support the creation and implementation of a coherent wayfinding system that improves walkability and legibility, guiding residents and visitors to Arklow's key destinations, including the town centre, train station, bus stops, Arklow Harbour, Arklow Marina, and local beaches.</i>

Chief Executive's Response

The CE acknowledges the presence of underutilised and vacant properties within Arklow Town Centre and recognises the significant regeneration opportunities offered by the re-use of vacant structures, redevelopment of unoccupied street frontages and utilising back land plots to the rear of town centre properties. The Development Strategy in the draft LPF seeks to facilitate the regeneration and future development of Arklow Town Centre, ensuring that it becomes a high quality, attractive and sustainable place to live, visit and conduct business. Maximising the development potential of large and infill sites in the town centre and the waterfront are prioritised. Both the town centre strategies, objectives and standards set out in the Wicklow County Development Plan and the detailed objectives outlined in the LPF (such as ARK1) set out to support and facilitate the delivery of the overall strategy, however, implementation is dependent on investment / funding. It is not within the remit of this framework to introduce financial or other incentives; the objectives are intended to encourage and support investment and assist in securing funding where possible.

Residential Zoned Land Tax (RZLT) is one of the strategic incentives that has been introduced by the Government to tackle vacancy and dereliction and bring vacant residential and mixed-use properties back into active use. This policy has not applied in Arklow in the past due to the lack of adequate wastewater infrastructure which constrained development. Following the commissioning of the wastewater treatment plant, Arklow will now be included on the RZLT 2027 map, and any derelict or vacant residential zoned lands identified will be subject to the tax.

The draft LPF's Development Strategy seeks improve connectivity from the Town Centre to surrounding residential areas and significant recreational assets including Glenart Woods, the Avoca River south quay and the seafront including South Beach and Kynock Park.

Arklow Town Centre Objective ARK2 sets out *'to support and facilitate improvements to the public realm in Arklow Town Centre to provide an attractive, comfortable environment for pedestrians of all mobility levels, cyclists and users of public transport. Such improvements may include the following:*

- *Improvements in the 'walkability' and 'legibility' of the town centre via improved wayfinding signage, enhancement of pedestrian facilities along public roads and local laneways and improving connections from the town centre to the waterfront, Arklow Train Station and edge of centre residential areas*

It is not considered necessary to re-state the existing policy supports that are already provided for in the draft LPF and the CDP as they directly apply already in the LPF area.

With regard to building heights, it is Government policy (*Urban Development and Building Height Guidelines for Planning Authorities*, 2018) to support increased building height and density in locations with good public transport accessibility, particularly town / city cores. Increased building heights are to be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the NPF and RSES.

On foot of these submissions, no change is recommended.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

PART B.1.1 PUBLIC REALM

No.	Name	Issues Raised
11	Bernard Fox 145338	The submitter requests the LPF deliver public realm improvements – lighting, planting, seating, and wider footpaths to make the centre more welcoming and walkable.
22	Elizabeth Battye 183236	<p>The submitter makes the following suggestions:</p> <ul style="list-style-type: none"> ▪ Extend the parade ground public realm granite paving eastwards and subsequently westwards, along the main street, widening the footpaths and providing segregated cycle paths, with a unified style of lighting, paving, street furniture, event lighting terminals ▪ Establish a task group, including AMD council, Arklow Town Team and WCC Planning Department, with a one-year task to implement existing retail planning guidelines, on no exterior wiring, improving wooden and moulded shopfronts, eliminating plastic and pre-printed signage, providing architectural guidance owners and retailers, to maintain and reinstate the vernacular and traditional shop fronts <p>It is suggested that an additional objective be added to ARK2 as follows:</p> <ul style="list-style-type: none"> ▪ <i>A public realm redevelopment along the South bank of Arklow should occur, with suitable paving, lighting and seating.</i>
34	Fine Gael Arklow & Rathdrum Branch 202828	<p>The submitter suggests the following measures to enhance the vibrancy and appearance of the town centre:</p> <ul style="list-style-type: none"> ▪ Extend the parade ground area along Main Street to create a more defined civic space ▪ Construct high quality footpaths using durable, attractive materials ▪ Install appropriate street furniture, trees, and public lighting, including underground ducting to accommodate festival/Christmas lighting systems ▪ Preserve and promote the heritage and character of shopfronts, encouraging restoration in keeping with the town’s architectural style
39	Sandra Hall 091725	The submitter suggests that St Marys Park should be lowered in part to Main Street level to allow a visual link to the river and the new board walk over to Inbhear Mhor Park
41	Cecil and Julie Alexander 100917	<p>The submitters criticise the parade ground public realm project expressing that these works gave no increased benefit to the area and surrounds and suggests the absence of a public toilet has led to Tom’s Lane being used and other antisocial behaviour use. Concern is raised about the poor condition, lack of maintenance and accessibility issues of both Tom’s Lane and the Parade Grounds.</p> <p>It is put forward that the width of the footpath is not sufficient to cater to various users.</p>

Chief Executive's Response

The Draft LPF clearly sets out that the regeneration of the town centre, including public realm improvements, is a key objective of the framework, and is essential in order to maintain the vibrancy and vitality of the town centre as the heart of the settlement. The draft LPF sets out the aims, objectives and standards that any future public realm projects will be required to meet. Establishing a task group to address exterior wiring, improving shopfronts and signage falls outside the remit of an LPF, being operational implementation matters. These matters would need to be addressed through separate funding programmes or capital investment initiatives rather than through the LPF process.

South Quay

With regard to the suggested amendment of ARK2, this objective is being addressed through the ongoing Arklow Flood Relief Scheme. As outlined in the draft LPF, the flood relief works will enhance the public realm along the South Quay and extend the existing Riverwalk, strengthening the town's connection to its waterfront.

Street Lighting

Street lighting is maintained centrally by the public lighting team through a third-party contractor.

At this time, the Council has no programme or funding source to carry out an overhaul (redesign, ducting etc) of the public lighting system in Arklow town centre, but this will stay under review and funding sought if a funding scheme is made available.

Street Furniture

With regard to street furniture, the Council hopes to initiate a programme in the future (funding dependent) for the improvement of street furniture and has carried out condition surveys recently of bins and benches. The Council is conscious of the need to ensure that items on footpaths do not impede access or create hazards and will take rapid action in those circumstances to address any issues.

Planting

Trees on public lands (including on streets) are managed by the Council in accordance with the WCC Tree Management Policy <https://www.wicklow.ie/Portals/0/adam/Content/fWjhglXj2keBnvFiH7zcag/Link/Tree%20Management%20Policy.pdf>. A number of bodies are engaged with the process of supporting the planting more trees, in particular the Council's Climate, Environment, Recreation & Amenity Directorate, works directly with community groups and residents.

St Marys Park

This site is the grounds of the medieval church of St Mary, a national monument, marked as 'Grave Yard' on the 1838 OS 6-inch map. Substantial ground works to St. Mary's Park would disturb this sensitive heritage / archaeological site, therefore, lowering the park to Main Street level is not considered possible as this would very likely disturb historic burials.

Parade Grounds

The Council engages in daily street maintenance, including (but not limited to) bin emptying, litter removal and street sweeping. With respect to the Parade Ground, this urban space is power washed a number of times

per year to remove moss or other substances and is gritted when needed having regard to weather conditions to prevent slipping. Public toilets are provided and maintained by the Council at St. Mary's Park and at Castle Park. At this time, the Council has no programme or funding source for the development of further public toilets, but this will stay under review and funding sought if a scheme is opened. While the above issues are not within the remit of a land use framework, these concerns have been noted and will be brought to the attention of the department responsible.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

PART B.1.2 OPPORTUNITY SITES IN ARKLOW TOWN CENTRE

No.	Name	Issues Raised
22	Elizabeth Battye 183236	<p>The submitter requests the removal of the preservation order on the Ormonde Cinema as it is suggested that the architectural significance of the Art Deco facade lacks merit.</p> <p>The following additional text is suggested for Opportunity Site (OP) 1: <i>Access to and vistas of the Anglo-Norman Ormonde Castle ruins should be prioritised.</i> <i>Any development of Opportunity Site 01 should open walking, cycling and vehicular linkages between Vale Road, Avoca Riverwalk to the 19 Arches Bridge. Grading of the gradient should be carried out to ensure that all transport users, including wheelchair users, have their travel needs met.</i></p>
40	Knockinver Ltd 095609	<p>The submitter sets out their commitment to delivering a comprehensive integrated development on the 'Alps Site' with a mixed used application granted under PRR 24/84.</p> <p>Along the riverwalk, the previously permitted houses have been replaced with 3 storey duplex units. This typology offers several advantages in this context as it allows for a denser form of development at a lower cost per unit compared to apartment buildings.</p> <p>Additionally, the form and scale of duplex units are more appropriate to the sites riverside profile and will provide increased passive surveillance and improved private open space provision.</p> <p>They welcome the site's 'Town Centre' zoning and designation as Opportunity Site, recognising the mixed-use development potential of the site to transform the Main Street and serve as a catalyst for further regeneration in Arklow Town Centre. They also welcome the description of the site reflecting the significant challenges in the delivery of development at the site.</p> <p>The objectives specified for the site are broadly supported</p>
41	Cecil and Julie Alexander 100917	<p>The submitter is concerned with regard to the high-rise high-density developments alluded to in the LPF including 'The Alps', Former Morgan Doyle store/Marine Hotel, suggesting it would give rise to further congestion on the Main Street. High rise density developments for these sites are not the way to go due to other congestion problems that will emanate from these developments.</p> <p>It is suggested that converting vacant floors above retail premises into apartments is unviable due to insufficient parking which would lead to congestion and pressure on infrastructure.</p>
55	Cllr Peir Leonard 150524	<p>The submitter objects to the wording of Opportunity Site 2, raising concern that the proposal will harm Main Street's historic character through an overbearing third storey, fails to engage positively with the river, and risks severing Arklow's visual and pedestrian connection to the Avoca River and quay front.</p> <p>It is contended that the guidance prioritises high-density development over much-needed civic amenities and calls for the provision of a civic park, cultural facilities and stronger riverfront connectivity.</p> <p>It is also requested to require redevelopment as part of a comprehensive integrated masterplan unless community infrastructure and connectivity are clearly demonstrated.</p>

Chief Executive's Response

The support for the town centre zoning and objectives are noted.

Opportunity Sites – Concept Plans

The purpose of the identification of 'Opportunity Sites' and associated 'concept plans' is clearly set out in the draft plan as follows: **(emphasis added)**

*'Opportunity sites' (OP) are identified in this LPF, which would, **if developed**, also contribute to the enhancement of the public realm, streetscape, vibrancy, vitality, and the retail/services offer in the town centre. There are numerous underutilised and unoccupied properties within Arklow Town Centre that could be **redeveloped** to contribute to the enhancement of the area'.*

'Any development proposal for these sites should have regard to the objectives of the County Development Plan, this Local Planning Framework, and the Arklow Town Centre First Plan as relevant'.

*'For a number of the OPs / SLOs concept sketches are shown in this plan. **These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs.** Any application for permission on said lands must conform to all standards and requirements of the Planning Authority, as set out in this plan and the Wicklow County Development Plan'.*

The final designs of any redevelopment proposals are not fixed in the Local Planning Framework and any such concerns about the design, use, etc are premature at this stage. Should any public or private proposals come forward, the public will be consulted and given an opportunity to input in the normal manner as set out in legislation.

Opportunity Sites – General

Concerns with regard to parking, traffic, accessibility, walkability, visual linkages etc. are all considered by Development Management at the planning application stage in line with statutory guidance.

Opportunity Site (OP) 1 (The Alps)

The Anglo-Norman Ormonde Castle ruins are not included in the boundary of Opportunity Site 1, adding this into OP1 objectives is not considered appropriate. Please refer to Section B.7 'Architectural Heritage' of this report which addresses this in detail.

The CE is satisfied that the objectives of OP 1 provide an enhanced visual and pedestrian connection between the Main Street and the Avoca River beyond which exists currently at this location. OP1 objectives set out that *'Any development shall comprise of a series of new streets/laneways, opening up walking and cycle linkages between the Vale Road and the river and Upper Main Street / Parade Ground to the river'*. Universal design policies apply to all future developments to ensure accessibility of all needs are met as set out in Objective **ARK 75** of the draft LPF.

Opportunity Site (OP) 2 (Main Street)

With regard to concerns that a three-storey development may adversely affect the character of the area, it is noted that existing buildings at this location are two to three storeys in height. OP2 objectives stipulate a maximum building height to ensure that any future development remains consistent with the established built form and does not detract from the streetscape or result in an overbearing impact.

The subject site is zoned 'Town Centre' and benefits from an extant planning permission for residential development in accordance with town centre living objectives. In line with the zoning provisions, residential development is prioritised over civic amenity at this location, and the provision of necessary supporting infrastructure has been appropriately addressed at the planning application stage.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

PART B.1.3 CORE RETAIL AREA

No.	Name	Issues Raised
55	Cllr Peir Leonard 150524	<p>The submitter suggests the addition of new text as follows:</p> <p>Objective ARK4 - <i>To permit the nature and scale of retail development appropriate to enable Arklow Town Centre to perform its role and function as defined within the County Retail Strategy and ensures development contributes positively to the town’s architectural heritage, maritime identity, high-design streetscape, craft and cultural economy</i></p> <p>Objective ARK5 - To vigorously protect and promote the vitality and viability of the town centre. Development proposals not according with the fundamental objective to support the vitality and viability of the town centre must demonstrate compliance with the ‘sequential approach’ before they can be approved. The ‘sequential approach’ shall be applied and assessed in accordance with the ‘Retail Planning Guidelines, (DoECLG, 2012)3 . The Planning Authority will discourage new retail developments if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the County. <i>Ensure retail and mixed-use redevelopment supports local identity, heritage, visitor economy, craft, and culture. Proposals must demonstrate compliance with the Sequential Approach and enhance architectural quality, heritage setting, placemaking, visitor experience, and connectivity to riverfront/waterfront.</i></p> <p>Objective ARK6 - Sites identified for Local Shops and Services shall facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from the town centre. <i>Support diverse retail and service uses via incentives for local produce, artisan goods, and craft enterprises, strengthening town-centre vitality, visitor economy, and maritime/heritage-led character.</i></p> <p>The submitter suggests the addition of a new ‘shop front policy’ as follows:</p> <p>Policy SF-1: Town Centre Heritage & High Design Shop-Fronts</p> <ul style="list-style-type: none"> ▪ <i>Respect/reinstate original fascia lines, window proportions, and detailing; use high-quality natural materials; active transparent frontages.</i> ▪ <i>Discourage internally illuminated box signage, plastic fascias, heavy roller shutters, and oversized branding.</i> ▪ <i>Require design statements showing contribution to Arklow’s heritage, craft culture, streetscape, and visitor/cultural offer.</i> ▪ <i>Encourage heritage facade restoration, craft retail reflecting “Made by the Sea,” and linkages to public realm, river/quay frontage, and maritime/nature-town identity.</i> ▪ <i>Traditional canopies (canvas, wrought-iron, timber) favoured; plastic/uPVC prohibited; curved/Dutch canopies not permitted.</i> <p>The submitter suggests that Figure B 1.6 be amended to extend the ‘Core Retail Area’ to the entrance to Castle Park carpark.</p>

66	Jonathan O'Toole 165620	<p>The submitter suggests that the retail core map for the town be reduced in size and extend from Bridge Street to the Railway Bridge on Upper Main Street only. He acknowledges a reduction in the retail core since the 2018 LAP but argues both it and the proposed retail map in the draft LPF are too large and do not reflect the actual retail centre of Arklow.</p> <p>The submitter notes the Bridgewater Centre and Lower Main Street are excluded from the retail core, while Upper Main Street is included despite weaker commercial viability. He suggests that a smaller more condensed retail core would improve vibrancy of the town centre, provide residential properties on the periphery on the town centre and promote sustainable reuse of existing buildings, significantly improving the vitality and viability of Upper Main Street.</p>
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Chief Executive's Response

It should be noted that a substantial proportion of the requested additional objectives and policies are adequately addressed through existing CDP and LPF objectives that apply directly to the plan area.

Objective ARK4 and ARK5

It is not considered necessary to add additional text to objective ARK4 as there are a number of objectives in the County Development Plan that protect heritage and seek good quality design, such as:

- CPO 5.17** *To harness and integrate the special physical, social, economic and cultural value of built heritage assets through appropriate and sensitive reuse, recognising its important contribution to placemaking. New development should respect and complement the historic fabric of existing towns and villages – the traditional street patterns, plot sizes, mix of building types, distinctive paving and attractive street furniture.*
- CPO 5.18** *To protect, integrate and enhance heritage assets, including attractive streetscapes and historic buildings, through appropriate reuse and regeneration and restrict inappropriate development that would undermine the settlement's identity, heritage and sense of place.*
- CPO 5.21** *To strengthen the urban structure of towns and villages by ensuring that any new development contributes to a coherent urban form, focused on a high quality built environment of distinct character. New development shall incorporate a legible and permeable urban form that protects and complements the character of the street or area in which it is set in terms of proportion, enclosure, building line, design and by the marrying of new modern architecture with historic structures.*
- CPO 5.22** *Within town and village centres, particularly the retail core, new development is required to provide for active street edges. Ground floor units should be occupied predominantly by uses that promote a high level of activity and animation. In order to maximise street activity, set-backs should be minimised and there should be a high frequency of entrances (every 5 to 10 metres).*

There are also a number of objectives in the draft Arklow LPF that protect heritage and seeks good quality design, such as:

- ARK 2** *To support and facilitate improvements to the public realm in Arklow Town Centre to provide an attractive, comfortable environment for pedestrians of all mobility levels, cyclists and users of public transport. Such improvements may include the following:*
 - *Improvements in the 'walkability' and 'legibility' of the town centre via improved wayfinding signage, enhancement of pedestrian facilities along public roads and local laneways and improving connections from the town centre to the waterfront, Arklow Train Station and edge of centre residential areas;*

- *Reduction in the dominance of private vehicles and space dedicated to private vehicles in the public realm, thereby facilitating the enhancement of space for social interaction and potential use for community and business uses;*
- *By improving the appearance of junctions and gateway areas into the Main Street, particularly the Main Street – Bridge Street junction and on approach from Back Street and Tinahask/Harbour Road.*
- *To seek as part of the redevelopment/refurbishment of properties along Main Street and Lower Main Street the reinstatement of former archways/vehicular/carriage entrances to provide pedestrian and cyclist routes between the Main Street/Lower Main Street, South Quay and Castle Park and open up backland and infill sites for redevelopment with vehicular traffic accessing plots from alternative locations if practical;*
- *In conjunction with the National Transport Authority, to carry out a feasibility study and support the development of an active travel bridge to the east of the 19 Arches Bridge improving the visual and physical connection between Arklow town centre, the waterfront and Bridgewater Shopping Centre;*
- *In conjunction with the National Transport Authority to carry out a feasibility study and support the development of a second active travel bridge to the west of the 19 Arches Bridge connecting Arklow Main town centre, the river walk with Ferrybank and SLO5 Kilbride.*
- *Improvement of quality and consistency of the public realm including more consistency in road surface treatments, paving materials, signage and street furniture;*
- *The implementation of a comprehensive public realm scheme along the south and north bank of the River Avoca and adjacent areas of Arklow Town Centre as part of the Arklow Town Flood Relief Scheme works.*
- *Improvement to overall enjoyment of the experience of being in Arklow town centre through reductions in traffic, street clutter, overhead cabling and incongruous public realm elements.*

ARK 3

To protect and enhance the streetscape of Arklow Main Street through the following:

- *a reduction in visual/street clutter;*
- *managing the level of signage on shopfronts;*
- *supporting the reinstatement of original building features and traditional style shop fronts in a sympathetic manner 2 and;*
- *the appropriate control of alterations to existing buildings and the development of new structures; in particular building and roof lines and heights which diverge from the established form will require to be justified.*

ARK 5

To vigorously protect and promote the vitality and viability of the town centre. Development proposals not according with the fundamental objective to support the vitality and viability of the town centre must demonstrate compliance with the 'sequential approach' before they can be approved. The 'sequential approach' shall be applied and assessed in accordance with the 'Retail Planning Guidelines, (DoECLG, 2012). The Planning Authority will discourage new retail developments if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the County.

Financial incentives

It is not within the remit of a land use framework to provide financial incentives to support a particular type of development, but to include objectives that support same.

Shopfront design

The introduction of a new shopfront policy mandating the reinstatement of original fascia lines, window proportions, detailing, high-quality natural materials, and active transparent frontages and so on is overly prescriptive and could unintentionally impact otherwise appropriate redevelopment proposals and it is not

considered necessary to re-state the existing policy supports that are already provided for in the draft LPF. The County Development Plan also provides detailed shopfront design guidance in the 'Development and Design' Appendix that address the issues raised in the suggested policy.

Retail Core Area

As stated in the draft LPF the focus for new retail shall be in the 'Core Retail Area' of the Town Centre while the remainder of the town centre (as zoned for such purposes) will constitute an area of secondary priority for retail development. Including the Bridgewater Centre in the retail core area would undermine the objectives and strategies in the overarching County Development Plan including **CPO 10.8** and **CPO 10.9** which provide that '*The 'core retail area' shall be promoted as the area of first priority for new retail development*'.

The objectives in the draft LPF also reiterate these overarching objectives - **ARK5** sets out '*To vigorously protect and promote the vitality and viability of the town centre. Development proposals not according with the fundamental objective to support the vitality and viability of the town centre must demonstrate compliance with the 'sequential approach' before they can be approved. The 'sequential approach' shall be applied and assessed in accordance with the 'Retail Planning Guidelines, (DoECLG, 2012). The Planning Authority will discourage new retail developments if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the County*'.

The inclusion of Upper Main Street in the core retail area is a strategic measure intended to support the regeneration of the traditional town centre. The designation of this area establishes a clear policy framework enabling the application of targeted measures to address dereliction, reduce vacancy, and promote the revitalisation and active reuse of this area to ensure that it is as just as commercially viable as Lower Main Street.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

4.2.4 Submissions related to Draft LPF (Part B:2) – Waterfront Zone

This section may also include submissions referring to waterfront elements that appear in Part A of the draft LPF.

B.2.0 MARITIME QUARTER/WATERFRONT REDEVELOPMENT

No.	Name	Issues Raised
11	Bernard Fox 145338	The submission requests the following: <ul style="list-style-type: none"> ▪ Create a maritime and tourism hub at the pier area, featuring cafés, artisan markets, and water-based recreation such as kayaking, paddleboarding or small boat hire. ▪ Redevelop the old pier and harbour area into a “Maritime Quarter”, featuring cafés, restaurants, craft shops, and small event spaces.
22	Elizabeth Battye 183236	The submission requests the following: <ul style="list-style-type: none"> ▪ Any developments in the Waterfront Zone should respect the unique (in Wicklow) historic, original vernacular architectural style combining thatch and other primitive design elements.
34	Fine Gael Arklow & Rathdrum Branch 202828	The submission requests the following: <ul style="list-style-type: none"> ▪ Relocate large industrial operations currently based in the harbour to sites nearer the N11, freeing up waterfront space for mixed-use and tourism development.
37	Brian Brennan TD 091304	The submission sets out the following: <ul style="list-style-type: none"> ▪ Significant development is required urgently in the Northern Waterfront Zone with the purpose of delivery of a town park, fit the meet the purpose of a vibrant growing town. At present, there is a piecemeal assortment of facilities and amenities, many in poor repair with no sense of purpose or structure and without and defined boundary. ▪ Accessibility and security must be a priority in line with the delivery of an amenity for all to use. ▪ Consideration should also be given to facilitation of the various sports clubs that utilise and train on the sports amenities within this area, with provision of secure storage and equipment space and adequate lighting for year round use

Chief Executive’s Response

Maritime Quarter/Redevelopment of Waterfront

The CE agrees that the waterfront zones require regeneration, to create a vibrant mixed-use quarter which provides for commercial, cultural, community, leisure and residential uses. Attention is drawn to the detailed text of SLO1 ‘Northern Waterfront Zone’ and SLO2 ‘Southern Waterfront Zone’ which provides for mixed-use high-density development in these areas, including cafés/restaurants, small shops and marine based leisure activities. No change is considered necessary in this regard.

In relation to the suggested relocation of industry, Section B.2 of the Variation / draft LPF contains a range of policies/objectives in relation to the mixed-use redevelopment of the area. The Variation / draft LPF has also provided for a significant amount of undeveloped E ‘Employment’ land to allow for industry relocation, should a business decide to do so. It should be noted that the CE considers that harbour/maritime industrial activities should continue in this area alongside any redevelopment for residential/tourism/other uses.

Vernacular Architectural Style

Please see Section B.7 of this report, where this issue is addressed.

Town Park

It is not envisioned that considerable areas of the northern waterfront zone would be utilised for a new town park, considering the existence of Kynoch / Duck Pond Park and sporting facilities a short distance to the north, and the description of SLO1 which envisions *'marine based commercial and/or leisure activities on the sites with access to the waterfront, while high intensity mixed use (predominantly residential) development will be promoted on the northern sites'*.

Issues in relation to services for sports clubs are dealt with elsewhere (Section B.6) in this report.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.2.1 ACCESS TO RIVER/SEA

No.	Name	Issues Raised
15	Elizabeth Fitzgerald 153136	The submission requests invested in an 'Avoca River Angler Access and Infrastructure Initiative'.
22	Elizabeth Battye 183236	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Southern Waterfront Zone: Adjacent to Site E, pedestrian and emergency vehicular access to South Beach should be installed. ▪ Ensure a safe route to water for Arklow Rowing Club and Sea Scouts, and other leisure mariners. 
34	Fine Gael Arklow & Rathdrum Branch 202828	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ At the southern waterfront (adjacent to Site E), a pedestrian and emergency-access route to the South Beach should be prioritised for development.

Chief Executive's Response

Avoca River Angler Access and Infrastructure Initiative

Please see Section B.7 of this report where this issue is addressed.

Safe Route to Water/South Beach for users

A range of objectives in the Proposed Variation / draft LPF refer to pedestrian movement around the quays/waterfront zone, for example SLO2 requires that developments in that area maintain access to the waterfront for marine users, and that the redevelopment of the Arklow Pottery Site shall retain the vehicular access to Arklow Beach and facilitate pedestrian access though the site via a series of new streets and public spaces.

Maintaining access for emergency vehicles is noted and it is recommended to alter the LPF to include this.

Chief Executive's Recommendation

Alter SLO 2 objectives as follows:

SLO 2 Southern Waterfront Zone objectives

Alter the following bullet point -

- Maintaining ease of access to the waterfront for existing and future marine users (such as the Sea Scouts and Arklow Rowing Club) **as well as emergency services** shall be a key consideration in the regeneration of this area.

B.2.2 WATERFRONT OBJECTIVES

No.	Name	Issues Raised
55	Cllr Pier Leonard 150524	<p>The submission makes comments on the following waterfront objectives:</p> <ul style="list-style-type: none"> ▪ ARK 10: Agree, giving priority to locally established water sports clubs over commercial entities. Protect the local community groups access to marine space. ▪ ARK 11: Improved access to southern beach should be considered socially (fair and equitable) and universally (level access and neurodiversity) ▪ ARK 12: Detail design of finishes should prove they are adequate for coastal location and be of an architectural language that's appropriate to location. Development must be appropriately scaled and pay due respect to the coastal location (giving shelter, vistas, and solar access(and heritage of the place. ▪ ARK 13: Retail should be strictly limited to only serve the immediate need of residents/ workers/ visitors, no large to medium scale unit shall be allowed. Beach side retail should be kiosk only with an equal distribution of offering (not repetitive). Beach side kiosk should operate on a priority system whereby local food ingredient-based foods are given preference during season. Allow provision for electrical connection points for occasional events. ▪ ARK 14: Agree, also all new development to undertake shadow studies and wind assessments so as not to negatively impact the environment of public spaces. An active market space should be provided on quay side. ▪ ARK15: Any hotel development must take into account the quantum of existing accommodation in the town centre and assess provision on this basis. Open water leisure facilities should be accommodated in the harbour for public use and accessible to all. ▪ ARK 16: Prior to any development of masterplan or otherwise a comprehensive architectural and maritime heritage study must be undertaken alongside an archaeological assessment. No element of maritime or pottery heritage is currently listed as a Protected Structure, this is inappropriate given the heritage of the site as such a comprehensive study need be undertaken immediately. Part of the historic pottery buildings remain on the corner along South Quay opposite RNLi Lifeboat Station at Arklow Harbour, this must be given a Protected Structure and a feasibility study undertaken to assess its viability as a site for Arklow Pottery Museum.
Chief Executive's Response		
<p>Objective ARK 10</p>		
<p>Agreement noted. It would not be considered appropriate to prioritise one group of users over another in this area. In relation to access, attention is drawn to the text of SLO2, which states the following: <i>'Maintaining ease of access to the waterfront for existing and future marine users (such as the Sea Scouts and Arklow Rowing Club) shall be a key considered in the regeneration of this area.'</i></p>		
<p>Objective ARK 11</p>		
<p>Universal Design principles are supported in the Wicklow County Development Plan 2022-2028 with a number</p>		

of objectives throughout the CDP and therefore will inform the design/assessment of relevant developments in this area, such as:

CPO 5.23 *To require that new town centre development particularly public realm improvement works incorporates the principles of universal design to create an environment that is accessible, usable, convenient and a pleasure to use for all users.*

CPO 6.8 *Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time and in particular to require that all new residential developments in excess of 20 residential units to provide a minimum 5% universally designed homes in accordance with the requirements of 'Building for Everyone: A Universal Design Approach and the Universal Design Guidelines for Homes in Ireland (2015).*

CPO 7.8 *To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.*

Objective ARK 12

Attention is drawn to the text of SLO1 and SLO2, addressing the issues raised, as follows:

'All development proposals shall consider this location's exposed and visually prominent coastal location. Proposal shall be of a high architectural quality. High quality finishes are to be used in the public realm, including external elevational treatment to buildings, structures and public open space. Soft landscaping shall also consider this coastal location. Finishes shall be attractive and durable, and appropriate to the scale, form and appearance of the buildings and their surroundings.' [SLO 1]

'Proposals for this site shall be of a high architectural and landscape quality incorporating some reference to the former use of the site by Arklow Pottery and contribute positively to the streetscape and public realm environment of this area. The design shall carefully consider the visually prominent location of this site which will form primary facades onto Arklow Beach to the east, the Avoca River and Arklow Port to its north and west and Arklow Golf Club to the south.' [SLO2]

'All development proposals shall consider this locations exposed and visually prominent coastal location. Proposal shall be of a high architectural quality. High quality finishes are to be used in the public realm, including external elevational treatment to buildings, structures and public open space. Soft landscaping shall also consider this coastal location. Finishes shall be attractive and durable, and appropriate to the scale, form and appearance of the buildings and their surroundings.' [SLO2]

Objective ARK 13

The waterfront zones are located outside the Arklow Core Retail Area as set out in the Wicklow County Development Plan 2022-2028, which will inform the assessment of any retail planning application in this area alongside the retail policies of the CDP/LPF and the Retail Planning Guidelines 2012. On this basis, it is not considered necessary to alter this objective in this regard.

Noting that the Arklow Pottery site directly adjoins Arklow South Beach, the CE does not agree that retail in this area should be kiosk only, considering the opportunities for seating/shelter that internal space could offer in this coastal area. Supply chain considerations for retail in this area are beyond the remit of the LPF.

Objective ARK 14

Agreement noted. Shadow studies assessments would be requested at development management stage, where deemed necessary. Wind assessments are not a standard requirement, however they could be

requested where deemed necessary at the development stage. It would not be considered appropriate for a general objective, operating throughout the waterfront zones, to include a requirement for a market in an unspecified location.

Objective ARK 15

It is considered that the text of SLO1 and SLO2 address leisure access to water. In relation to the quantum of accommodation, there appears to be only one hotel within the town centre (namely Hoey's Bridge Hotel), with the Arklow Bay Hotel being further distant. It is considered that accommodation development within the waterfront zones would be desirable as this would be within walking distance of the town centre and improve the vitality thereof, while being able to take advantage of a waterfront location.

Objective ARK 16

Issues in relation to heritage buildings and the record of protected structures are addressed elsewhere in this report (section B.7). Structures not listed on the RPS can still be assessed via architectural heritage impact assessment and, where necessary, protected at development management stage.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

4.2.5 Submissions related to Draft LPF (Part B:3) – Housing Development

B.3 RESIDENTIAL DEVELOPMENT (GENERAL)

No.	Name	Issues Raised
37	Brian Brennan TD 091304	The submitter puts forward that no land that is currently zoned as residential should be dezoned under this plan as the potential housing development in Arklow is welcomed in the midst of the current housing crisis
39	Sandra Hall 091725	The submitter suggests that all new housing developments should have the following: <ul style="list-style-type: none"> ▪ grey water systems (retrofit and new) ▪ water butts ▪ a community garden as part of the estates green space ▪ dedicated uncultured zones for native plants for biodiversity ▪ All new developments of any size should have to plant quantities of trees, some on site and pay for planting other areas in Wicklow
55	Cllr Peir Leonard 150524	The submitter suggests a new Objective as follows: <p>Community Benefit from Residential Zoning Uplift</p> <p><i>To ensure that any change in zoning for residential development which results in a significant increase in land value in Arklow town centre is accompanied by proportionate, clearly-defined delivery of community infrastructure, cultural, social or heritage facilities. This may include contributions to arts and cultural centres, community hubs, public open spaces, craft & design enterprise spaces, or other community-facing amenities. Developers benefiting from zoning uplift must submit a Community Gain Agreement evidencing how their development will deliver meaningful local benefit in tandem with housing output.</i></p> <p>The submitter provides the following rationale in support of this request:</p> <ul style="list-style-type: none"> ▪ National policy is evolving to ensure that communities benefit from the uplift in land value arising from development and zoning. The proposed Land Value Sharing and Urban Development Zones Bill sets out measures to capture up to 30% of the uplift in land value from rezoning for housing, with revenues directed to infrastructure and community facilities ▪ Guidance indicates that developer contributions (via Section 48/49 of the Planning and Development Act 2000) can be used to fund the infrastructure and community benefit required by increased development <p>Embedding this objective ensures that Arklow’s town-centre regeneration is not solely about increased housing density but also about delivering improved community infrastructure, culture, heritage and civic amenity</p>
Chief Executive’s Response		
<p>Having regard to the challenges facing the housing market, the draft LPF was crafted to ensure that any land already zoned for housing, where said land remained suitable for housing, retained its residential zoning, and ‘de-zoning’ or ‘banking’ was not contemplated due to Core Strategy figures or targets. In determining if currently zoned land remained suitable for future housing, the following principal factors were taken into account:</p> <p>(a) the servicing status of the lands; as provided for in the NPF and Development Plan Guidelines, where lands are not serviced and cannot be serviced within the horizon of the LPF, they should not be zoned;</p> <p>(b) the flood risk status of the lands;</p>		

- (c) the environmental sensitives or vulnerabilities of the land with respect to ecology and biodiversity, particularly taking into account studies and assessments carried out since the previous plan was adopted, including the GI Audit carried out as part of this LPF;
- (d) whether the lands would be better suited for development for an essential community facility identified in the Social Infrastructure Audit;
- (e) any submission made at pre-draft stage from the landowner requesting a change in zoning from housing to some other use.

The quantum of overall residential zoned land in the draft LPF meets the needs of the projected population for the lifetime of the plan and beyond (including the significantly increased target set out in proposed Variation No. 6 of the County Development Plan). The Planning Authority is very conscious of the need for housing and the draft LPF facilitates residential development while incorporating the principles of sustainable development.

With regard to the request to integrate certain design elements into new housing developments, these areas are all addressed in the Development and Design Appendix of the County Development Plan.

There are currently no provisions in the planning legislation to support the inclusion of such an objective in a local plan. Once the 'Land Value Sharing and Urban Development Zones' Bill is passed / enacted, this will introduce a measure where a new levy / tax may be applicable where land is upzoned and the value is increased. The payment of financial contributions (towards community development) is a normal condition attached to new residential development in accordance with Wicklow County Council's Development Contribution Scheme.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.3.4 HOUSING TARGETS & EXTANT PERMISSIONS

No.	Name	Issues Raised
64	Cairn Homes Properties Ltd 163518	<p>The submitter sets out the following:</p> <ul style="list-style-type: none"> ▪ in essence, the only policy mechanism proposed to support town centre regeneration is to prevent residential development happening in greenfield locations, on lands that have no commonality of ownership. ▪ while the LPF acknowledges the development of greenfield sites are necessary, the plan adopts a restrictive framework on implementation. ▪ the draft LPF clearly states that its land use strategy is based entirely on the 2022 Development Plan Core Strategy. The draft LPF subsequently incorporates a series of restrictive objectives (ARK 17 and ARK 18) and prevent developers bringing land forward on the RN2 lands in the short term (i.e. life of the development plan). ▪ ARK 18 and all corresponding areas of text that restrict housing supply on zoned land is contrary to NPF Guidelines and Development Plan Guidelines and should be omitted in its entirety. ▪ Section B.9.2 reemphasises the restrictive phasing and implementation strategy in the LPF does not reflect the intent of the NPF Implementation Guidelines (2025) or the Development Plan Guidelines (2022). ▪ a phased or tiered approach designed for a 6 year plan is irrelevant for a 2 year implementation window. ▪ the draft LAP needs to ensure there is adequate provision for zoned and serviced sites that are likely to come forward during the lifetime of the plan as research demonstrates the actual activation and housing completion rates are far below the 75% rate of all zoned lands. ▪ There is scope within the planning hierarchy to adopt a more responsive zoning and development strategy. ▪ The draft LPF and Variation incorporates in-built impediments to development, both in terms of phasing and sequential development that undermine a robust planning framework where developers and investors can have confidence in a fair and efficient implementation.
Chief Executive's Response		
<p>There is a range of objectives in Section B:1 'Town Centre Regeneration' and in the Wicklow County Development Plan which support town centre regeneration, so it is not considered quite correct that the only mechanism provided for in the LPF to encourage town centre development relates to managing the development of greenfield land.</p> <p>This submission has referred to the publication of the "<i>NPF Implementation: Housing Growth Requirements</i>", in July 2025, which included new housing targets for Wicklow, which has necessitated a review of the CDP beyond the remit of Variation 5 itself. Wicklow County Council's (WCC) implementation of these requirements, and how it affects the Arklow LPF is outlined below:</p> <p>NPF Implementation - Revised Housing Targets – Proposed Variation No. 6</p> <p>In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.</p>		

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, the variation also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1

All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 with submissions invited. The Chief Executive’s Report on the submissions received to the proposed variation was issued to the Elected Members in February 2026 for their consideration. The Variation may be made following on from this or Material Alterations may be proposed.

In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from a growth of 1,221 units 2016-2022 as set out in current County Development Plan, to an increase of 4,056 units 2016-2031).

Draft Arklow LPF: Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From **Section 3.0: Introduction**

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From **Section 3.4: Zoning**

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

- (c) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (d) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (as is proposed in Proposed Variation No. 6).

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

4.2.6 Submissions related to Draft LPF (Part B:4) – Economic Development & Employment

B.4.0 ARKLOW ECONOMY

No.	Name	Issues Raised
11	Bernard Fox 145338	The LPF should support local independent businesses, cafes, and small markets, helping to build a strong local identity and year-round footfall.
55	Cllr Pier Leonard 150524	<ul style="list-style-type: none"> ▪ The submitter considers that Arklow is well placed to embrace significant opportunities in data centres, renewable energy, and investment through IDA sites, positioning the town as a national exemplar of a sustainable, decarbonised economy. To attract this growth Arklow must restore its town centre. ▪ It is suggested that a new multipurpose civic arts and cultural centre in Arklow would encourage creative enterprise in the town. ▪ It is put forward that there is a need for mentorship, financial support and adaptive reuse schemes to help local entrepreneurs and craftspeople occupy vacant premises. ▪ It is suggested that that local produce and cuisine could be promoted by a local food market, community allotments and spaces, shared kitchens, outdoor food areas and food festivals.
Chief Executive's Response		
<p>It is agreed that Arklow has significant potential for investment and new employment opportunities. The LPF, along with the CDP and the various strategies and programmes of the numerous employment agencies active in this area, aims to put in place a framework within which new employment can be delivered and supported. The economic and employment strategies, objectives and standards set out in the Wicklow County Development Plan 2022-2028 apply directly to the LPF area.</p> <p>Supporting and attracting businesses</p> <p>A land use plan has no direct role in creating jobs or bringing new employers; however, this framework ensures the availability of zoned land for employment purposes and includes objectives facilitating employment development.</p> <p>The economic development strategy set out in the LPF supports and facilitates, to the highest degree possible (subject to environmental and other relevant planning considerations) all forms of employment generation and in particular, to encourage employment and commercial uses as a key activity in the town centre. Employment Objective ARK 23 relates to employment creation and promotes the intensification of activities at existing suitable employment locations especially where this can mitigate long distance commuting.</p> <p>The CE is satisfied that the draft LPF provides an appropriate amount of E 'Employment' zoned land for the lifetime of this Framework. The minimum quantum of zoned undeveloped employment land needed is 85 ha and the LPF will provide c. 138 ha of undeveloped employment land, which will facilitate continued investment in data centres, renewable energy and other industries. The employment zonings include greenfield land ensuring that there is no shortage of site choice for developers of new employment of different sizes.</p> <p>Economic development will also be supported by other land use zonings including WZ 'Waterfront' which will support the continued and new employment, maritime and port uses. LPF objective ARK 26 is <i>"to encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the LPF area and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse</i></p>		

or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.”

With regard to the need to restore the town centre, the CE considers this in Chapter B:1 (Town Centre Regeneration).

The CE would also advise that, whilst it is not the role of the LPF to provide direct support to businesses, WCC’s Local Enterprise Office provides extensive support and services to help start, grow and develop small businesses in Co Wicklow. It provides a range of advice, information and supports, including financial supports, to businesses in the County.

Food Economy

Arklow’s food economy, and that of the wider area, is supported by both the County Development Plan and the draft LPF:

- **Food markets and festivals:** CDP objective CPO 5.5 is to facilitate country markets in town and village centres subject to proper planning and development.
- **Community allotments and spaces:** CDP objective (CPO 7.49) is to support and facilitate the development of allotments and community gardens whilst the draft LPF confirms these are appropriate on land zoned OS1 (Open Space).
- **Shared kitchens:** depending on the nature of the operation, can come forward on sites zoned TC (Town Centre) or E (Employment)

The CDP encourages the food economy in Wicklow including objective CPO 9.29 which is to support and facilitate the development and expansion of the food sector which has benefits for urban and rural areas. Further support for the food economy is provided through the wider town centre objectives (considered in Chapter B:1 of this report).

Creative Economy

The CE recognises the value of the county’s creative economy and the arts. The draft LPF’s TC (Town Centre), E (Employment) and WZ (Waterfront) land use zonings in particular ensure that there is sufficient land for a broad range of creative activities to come forward. Creative industries are also supported, such as CDP objectives CPO 7.52 which facilitates opportunities for the provision and development of Arts projects and CPO 9.26 which supports the film industry.

It should be noted that while the CDP and the LPF fully support and facilitate the provision of cultural and recreational facilities should such a project be come forward, it does not fall within the remit of a land use zoning framework to deliver such developments. The CE also notes the availability of WCC supports including the Creative Wicklow Grant Scheme and the Creative Wicklow Innovation Award.

Chief Executive’s Recommendation

No change to Proposed Variation / draft Arklow LPF.

4.2.7 Submissions related to Draft LPF (Part B:5) – Tourism Development

B.5.0 TOURISM OBJECTIVES

No.	Name	Issues Raised
9	Paul Byrne 84713	The submission requests the following [in relation to this section]: <ul style="list-style-type: none"> That Objective ARK 36 (in relation to the development/maintenance/improvement of greenways and walking/cycling routes) both be altered to include the following text in a list of projects: <i>'Existing walking infrastructure on top of the coastal protection rock armour embankment that extends from the Caravan Park along the sea side perimeter of Kynock Park & the Duck Pond, to the new Uisce Éireann Wastewater Treatment Plant.'</i>
22	Elizabeth Battye 183236	The submission requests the following: <ul style="list-style-type: none"> ARK 35: Groins should be installed on the North Beach of Arklow, towards the sea, to allow gradual access to the sea for swimming and angling. ARK 36: Full access to the coastal walk along North beach should be included here, not just a section of it.
55	Cllr Pier Leonard 150524	The submission requests the following new objectives: <ol style="list-style-type: none"> <i>'Position Arklow as a seaside destination integrating cultural-heritage, craft production, and marine recreation.'</i> <i>'Support marine-leisure (sailing, kayaking, sea-angling) and craft/arts producers at riverfront/quay, celebrating boat-building and pottery heritage.'</i> <i>'Promote year-round tourism via craft-led retail, visitor experiences, and cultural events.'</i> 'Sustainable Rail Gateway & Cultural Hub:' <ul style="list-style-type: none"> <i>Support the use of the Goods Store building at Arklow Railway Station as a cultural-craft & design centre.</i> <i>Connect to Arklow Pottery Trail and craft experiences.</i> <i>Support heritage tourism, creative economy, and town centre vitality.'</i> 'Marine Tourism & Waterfront Gateway:' <ul style="list-style-type: none"> <i>Develop waterfront as a marine-tourism destination, with yacht/tall-ship stop-offs, marine/quayside infrastructure, and cultural/craft integration.'</i> 'Festival & Event Tourism Growth (ARK Y):' <ul style="list-style-type: none"> <i>Support high-quality festivals/events highlighting maritime, craft, and seaside identity.</i> <i>Extend visitor season, strengthen town-centre regeneration, and leverage regional tourism capacity.'</i>
Chief Executive's Response		
ARK36		
<p>In relation to Objective ARK 36 and a coastal walk, the draft LPF, as well as the CDP fully support the development of a 'coastal walk'. The existing coastal embankment was designed as a coastal protection measure in response to the flooding during Hurricane Charlie and was not engineered at the outset to accommodate a walkway. The Council has endeavoured over the years to provide and maintain an amenity walkway, but regular damage / slippage has resulted from storms. The provision of a more stable and permanent walkway would require re-engineering of the revetment, and at this time there is no programme or funding available for such a project. However, the Council are continuing where feasible to carry out repairs and to seek funding for a longer-term solution.</p>		

ARK35

In relation to the suggestion of alteration of Objective ARK 35 to include reference to Beach Groynes: this objective is in relation to infrastructure for uses by tourists, rather than referring to coastal erosion/beach stabilisation infrastructure and would therefore not be appropriate to alter in this regard. Attention is drawn to Objective **ARK84**, which supports the provision of new or the reinforcement of existing coastal defences/protection measures. The CE is satisfied that this objective would support the installation of groynes, were such an action to be proposed by a state agency or other party.

A range of new objectives are suggested in **Submission No. 55**, which can be addressed in turn as follows:

1. This suggested text would be more suitable as an element of an overall tourism strategy rather than a listed objective of a land-use plan and is not clear how such an objective would be implemented or assessed at development management stage. Therefore no change is recommended.
2. Attention is drawn to Objectives ARK 11, ARK 14 & ARK 15 in Section B.2 Arklow Waterfront Zones, alongside text in SLO2 referring to leisure access to the waterfront/references to craft heritage (Arklow Pottery). The appropriate uses for the WZ 'Waterfront' zoning also include 'civic/cultural uses' that would cover cultural/crafts/arts developments. The CE considers that these objectives cover the intent of the suggested objective and no alterations are necessary. This suggested text would be more suitable as an element of an overall tourism strategy rather than a listed objective of a land-use plan and therefore no change is recommended.
3. WCC is currently engaging with Irish Rail to finalise a lease with Irish Rail for the Goods Store building in Arklow railway station. WCC hopes to then put a sub-lease in place with a local group in Arklow who will be developing it as a community arts space. The County Development Plan supports the delivery of community / arts / crafts facilities through several community development objectives including CPO 7.3, CPO 7.52 and the reuse of vernacular buildings with objective CPO 8.18.
4. Attention is drawn to Objective ARK 35, which covers the majority of the suggested objective. While a statement of intention to hold tall-ship stop offs is beyond the remit of the LPP, the CE is amenable to altering this objective to include explicit reference to berthing infrastructure.
5. The support of festivals on a certain theme would be more suitable as an element of an overall tourism strategy rather than a listed objective of a land-use plan. Requests in relation to extending visitor seasons, leveraging regional tourism, etc., are beyond the remit of an LPP.

Chief Executive's Recommendation

Alter Objective **ARK 35** as follows:

'To support and facilitate the improvement of existing and the development of additional recreational infrastructure at beaches, harbours and coastlines in the LPP area, including (but not limited to):

- *improvements to coastal access, including for those with disabilities, in particular Improvements to the visual and physical connectivity between the town centre and Arklow South Beach,;*
- *improvement of existing or development of new toilets, changing facilities, waste disposal facilities etc; improvement of existing or development of new appropriately scaled and located car parking;*
- *infrastructure supporting swimming, sailing, marina/quayside berthing, rowing and other water sports, and shore fishing subject to ensuring no adverse environmental or visual impacts.'*

B.5.1 TOURISM FACILITIES AND ACTIVITIES

No.	Name	Issues Raised
11	Bernard Fox 145338	The submission requests that the Variation / draft LPF support the creation of new entertainment and leisure facilities, including the following: <ul style="list-style-type: none"> ▪ A family entertainment complex (bowling, crazy golf, laser tag, go-karting). ▪ Indoor recreation spaces and youth facilities. ▪ Seasonal outdoor events (food markets, open-air concerts, and waterfront festivals). ▪ Integration of these facilities within or near the town centre and waterfront, ensuring they contribute to local footfall and do not become isolated.
15	Elizabeth Fitzgerald 153136	The submission requests the following: <ul style="list-style-type: none"> ▪ That an 'Avoca River Angler Access and Infrastructure Initiative' be invested in. ▪ This would involve the installation of wheelchair accessible jetties and pathways along the river walk, Day pass fishing licences, Equipment rental/ bait sales, a market place/stalls along the river walk, management of fishing facilities by local fishing shop owner. ▪ The initiative will attract visitors, enhance the tourist reputation of the town, provide an enjoyable amenity for families and people with disabilities, make the most of the Avoca River, promote inclusivity and accessibility.
56	Cllr Warren O'Toole 155026	The submission requests the following: <ul style="list-style-type: none"> ▪ A dedicated campervan 'aire' within walking distance of the town centre, providing serviced facilities to encourage longer visitor stays and local spend. ▪ A designated walking and greenway route from Arklow South Beach, the Maples, Knockmore to Glenart. ▪ A focus on water-based recreation (paddleboarding, kayaking, eco-tours) as part of a future Arklow Blueway. ▪ Support for local artisan markets and food events in new community or green spaces to strengthen Arklow's identity as a creative and coastal town. ▪ To incorporate vital infrastructure like toilets at coastal areas. ▪ All tourism and recreation projects should embed universal design and accessibility principles, consistent with Arklow's recognition as an Autism Friendly Town, with age-friendly planning and inclusivity for all regardless of abilities.

Chief Executive's Response

In relation to the provision of a range of tourist facilities, the Variation / draft LPF provides for a range of land use zoning and objectives which would allow for the development of such facilities. This would likely include the T 'Tourism', TC 'Town Centre', WZ 'Waterfront', and AOS 'Active Open Space'. Specific reference to the facilitation of tourism developments is made throughout the plan, e.g. Objective ARK 33, which states the following: *'To support opportunities to improve the tourism product in Arklow and to maximise the town's coastal location and as a gateway to tourism assets within Co. Wicklow.'*

As tourism uses are permissible under both the TC and WZ zonings, the land use framework allows for the spatial integration of tourism in these areas. Objectives within Section B.2 'Arklow Waterfront Zone' also makes specific reference to tourism development:

'To encourage new developments that provide for an improved mix of uses including commercial, retail and residential uses and to particularly encourage tourism and leisure related developments along the eastern edge of the southern waterfront zone with improved access to Arklow South Beach.'

Alongside the policies of the Wicklow County Development Plan 2022-2028, it is considered that the Variation / draft LPF provides an appropriate framework to support the development of the suggested tourism facilities. It would not be considered appropriate, however, to list the exact facilities requested to be delivered, and on that basis no alterations are considered necessary.

In relation to a requested 'Avoca River Angler Access and Infrastructure Initiative' and a request for a walking route from Arklow South Beach to Glenart, these have been addressed in Section B.7 of this report

In relation to the provision of a campervan aire, attention is drawn to Objective **ARK 39**, which supports the development of such.

ARK 39 To support:

- a) *the development of a touring caravan (Aires park) and camping/glamping sites (not static mobile home parks) in any land use zone in this LPF other than OS1 and OS2, subject to it being demonstrated that such use would not undermine the vision / objective of that zone to any material degree, or interfere with the compact growth and densification goals for the settlements in the LPF area having due regard to surrounding land uses and proper planning and development of the area and;*
- b) *The improvement of existing tourist accommodation related developments, subject to the proper planning and sustainable development of the area.*

In relation to water-based recreation and toilets at coastal areas, attention is drawn to Objective **ARK35**, which supports such activities/developments.

ARK 35 To support and facilitate the improvement of existing and the development of additional recreational infrastructure at beaches, harbours and coastlines in the LPF area, including (but not limited to):

- *improvements to coastal access, including for those with disabilities, in particular Improvements to the visual and physical connectivity between the town centre and Arklow South Beach,;*
- *improvement of existing or development of new toilets, changing facilities, waste disposal facilities etc;*
- *improvement of existing or development of new appropriately scaled and located car parking;*
- *infrastructure supporting swimming, sailing, rowing and other water sports, and shore fishing subject to ensuring no adverse environmental or visual impacts*

The support of festivals on a certain theme would be more suitable as an element of an overall tourism strategy rather than a listed objective of a land-use plan

In relation to universal design, the Council is committed to implementing Universal Design principles, and this is supported in the draft LPF in Objective **ARK75** and in the Wicklow County Development Plan.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

4.2.8 Submissions related to Draft LPF (Part B:6) – Social & Community Development

B.6.0 COMMUNITY CENTRE

No.	Name	Issues Raised
11	Bernard Fox 145338	It is submitted that the LPF should actively support the development of indoor recreation spaces and youth facilities, particularly for evenings and weekends.
39	Sandra Hall 091725	It is submitted that a dedicated community hall should be provided, and the old train goods store is put forward as a suggestion.
54	All kinds of amazing 144518	The submitter states that a dedicated community centre would provide vital opportunities for social interaction, education, and recreation for residents of all abilities and cultures. This facility should include accessible design, inclusive parking spaces, sensory-friendly hours, multipurpose rooms for youth programs, senior activities, cultural events, and local support groups.
56	Cllr Warren O'Toole 155026	The submitter suggests that lands be rezoned and designated for a dedicated town centre community facility that can host inclusive events, cultural programmes, meetings, sports and wellbeing activities. It is put forward that opportunities for shared or adaptive reuse of existing town centre buildings be assessed for short-term delivery while long-term plans are advanced.
62	KWETB Youth work, CWP/ECRDATF & Crosscare EWYS 095949	The submitter highlights the lack of community-based spaces and requests that the LPF provides a dedicated youth facility in Arklow, including in the Heatherside estate. The submitter states current infrastructure does not meet the needs of young people. They suggest the youth facility should be a multipurpose space which would serve as an out of school setting where creative, social and informal learning, youth led activities can occur. Reference to national policies and strategic youth plans are made in support of this request.
Chief Executive's Response		
<p>The CE acknowledges the shortfall in provision of indoor community centre facilities in Arklow. The Social Infrastructure Audit of the draft LPF identifies a lack of adequate community halls / centres and youth spaces to cater to the needs of the existing population. This document outlines that the provision of a multi-use community centre to cater to local community groups, classes and local scale social events would be hugely beneficial to the settlement. It was therefore deemed necessary that the draft LPF supports and makes provision for the development of additional community spaces that may be suitable for a range of users and uses.</p> <p>In order to support and facilitate the development of new community centres / facilities, such developments shall be acceptable in principle in all land use zones in this LPF other than OS1 and OS2, subject to normal planning considerations being fulfilled. Furthermore, where new indoor community space is required to be delivered as part of large-scale development, such spaces shall be required to be designed to meet the widest range of uses / users as possible. The Social and Community Objectives in the CDP and LPF support the delivery of a dedicated community facility, however the delivery of such a development does not fall within the remit of a land use zoning framework.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B.6.1 ARTS AND CULTURE FACILITIES

No.	Name	Issues Raised
11	Bernard Fox 145338	The submitter suggests that the plan should actively support the creation of leisure facilities near the town centre/waterfront including: <ul style="list-style-type: none"> Multi-purpose arts and performance venue capable of hosting concerts, community events, film screenings Seasonal outdoor events such as food markets, open air concerts, and waterfront festivals
37	Brian Brennan TD 091304	The submitter suggests Arklow needs a multi-purpose entertainment venue, capable of holding medium to large scale events/shows, that doubles as a rehearsal space for local groups. This has the potential to attract artists and entertainers to the town, enliven the nighttime economy and provide economic opportunity for local businesses.
39	Sandra Hall 091725	It is submitted that a dedicated theatre is needed in the town.
55	Cllr Peir Leonard 150524	The submitter highlights the limited provision of arts culture, and craft facilities and requests the establishment of a new multipurpose centre for performance, art and community events. The submitter suggests a new objective as follows: <i>To create a multipurpose civic arts and cultural centre in Arklow, incorporating a small theatre, exhibition and performance spaces, and flexible community facilities, to serve as a focal point for cultural, educational, and social activity in the town.</i>
62	KWETB Youth work, CWP/ECRDATF & Crosscare EWYS 095949	A cultural centre with a theatre space and a dedicated youth component would bring wide-ranging benefits to Arklow.

Chief Executive's Response

The CE recognises the shortfall of Arts and Cultural facilities as set out in the Social Infrastructure Audit of the draft LPF, with particular shortfalls identified through public consultation including inadequate theatre / performance space and art related spaces.

WCC are currently engaging with Irish Rail to finalise a lease with Irish Rail for the Goods Store building in Arklow railway station. WCC intend to then put a sub-lease in place with a local group in Arklow who will be developing it as a community arts space.

In order to support and facilitate the development of new Arts / Cultural space, such uses / developments shall be acceptable in principle in all land use zones in this LPF other than OS1 and OS2, subject to normal planning considerations being fulfilled. The Social and Community Objectives in the CDP and the LPF support the delivery of arts / cultural facilities, however, the delivery of same does not fall within the remit of a land use zoning framework.

The CDP has the following objectives for Arts & Culture –

Arts & Culture

CPO 7.53 *To facilitate opportunities for the provision and development of Arts projects.*

CPO 7.54 *To facilitate the creation and display of works of art at appropriate public locations, including appropriate locations within the streetscape, provided no unacceptable environmental, amenity, traffic or other problems are created.*

CPO 7.55 *To facilitate and support the development of the library service within the County.*

CPO 7.56 *To facilitate the development of new, improved or expanded places of worship and burial grounds including natural burial grounds at appropriate locations in the County, where the demand for the facility has been demonstrated.*

CPO 7.57 *To support and promote the development of a craft/design hub in Arklow, Co. Wicklow as a legacy to Arklow Pottery.*

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.6.2 SPORTS FACILITIES

No.	Name	Issues Raised
16	Arklow United FC 063341	The submitter suggests the town needs to develop sports facilities for the young people especially with the projected housing developments in the area. The submitter suggests a site owned by the Council, between the Wexford Road and the Arklow bypass, could possibly become a sports hub for the local community or at the very least, be used as a second pitch for Arklow FC. It is stated that the club are open to any alternative suggestions from the council with regard to a playing pitch.
22	Elizabeth Battye 183236	The submitter suggests Arklow's running track should be prioritised for a professional track surface. She suggests a polyurethane, multi-layered, durable, weather resistant, with optimal performance characteristics, shock absorption and energy return running track. VOCs, heavy metal volatile organic compounds, should be avoided. Water-based binders and proper drainage should be engineered into the design of a new running surface.
34	Fine Gael Arklow & Rathdrum Branch 202828	The submitter recommends the running track at the northern waterfront should be fully resurfaced to professional standards, recognising its vital role for local athletics, schools, and community groups.
37	Brian Brennan TD 091304	The submitter suggests that sports clubs need more space. It is put forward that more people are participating in sports and clubs need to be supported to ensure they have the space, pitches, facilities and the access to develop and thrive. The submitter welcomes the consideration being given to zoning of lands as AOS to facilitate expansion of existing sports clubs.
43	St. Benedict Inbhear Mor AC 103009	The submitter states the current athletics track located at Seaview Avenue is not fit for purpose despite recent works carried out. It is suggested the submitters receive or be allocated land or open space specifically for the club to develop its own facility including a purpose-built athletics track. It is submitted that this would benefit not only the members but also the other sports clubs in the area along with bringing in revenue to local businesses from hosting events.
56	Cllr Warren O'Toole 155026	The submitter suggests the LPF should identify and zone suitable lands for sports and club use, ensuring that emerging and existing clubs have safe, accessible and affordable outdoor areas for training, youth development and events. Shared use models between community groups should be encouraged to maximise public benefit and land efficiency.

Chief Executive's Response

A review of existing sports and recreation uses and future land use needs within the settlement has been carried out as part of the crafting of the draft LPF, as detailed in the Social Infrastructure Audit appendix of the draft LPF. The draft LPF has zoned land for Active Open Space (AOS) which allows for sports facilities to be developed, to meet current and future needs of the population of the settlement and its catchment. In this regard in accordance with WCC's Active Open Space Policy, active open space shall be provided at a rate of 2.4 ha per 1,000 population divided into:

- 1.6 ha outdoor play space (pitches, courts, sports grounds)
- 0.6 ha casual play spaces (parks)
- 0.2 ha equipped play space (playgrounds and MUGAs)

Based on the above rates, considering the 2031 population target of 16, 441 persons for Arklow, the following areas of active open space are required at a minimum.

- 26.4 ha outdoor play space
- 9.9 ha casual play spaces

- 3.3 ha equipped play space
(Totalling c. 40ha)

However, the sports and recreational facilities in the settlement cater for the population within the settlement as well as the population of the surrounding rural areas and need to be 'future proofed' for increased population above the current County Development Plan target (as is provided for by Proposed Variation No. 6). Based on the needs of a future catchment of c. 25,000 persons, the following areas of active open space would be required at a minimum :

- 40 ha outdoor play space
 - 15 ha casual play spaces
 - 5 ha equipped play space
- (Totalling c. 60ha)

With respect to organised sports grounds, there appears to be a need to ensure a total of c. 40ha of active open space in the settlement to cater for the future growth of the settlement and its catchment. There is already c. 16ha of AOS in the settlement and the draft LPF proposes to zone an additional c. 26 ha of AOS giving a total of 42ha zoned AOS.

With regard to the development of additional Active Open Space (AOS) including where existing clubs need enhanced or expanded facilities, it should be noted that the purchase of lands and provision / development of sports and/or facilities by the Local Authority is outside the remit of the LPF. It is the role of this land use framework to ensure adequate and suitably located lands are zoned for the uses needed to sustain the existing and future population, but the delivery / purchase / development of such new sports grounds would be an implementation and funding matter outside the remit of the LPF objectives. While the LPF provides objectives and zoning that would support the development of new sport grounds, the LPF is not the 'sports development plan' for the area and it is considered that these various suggestions would be more appropriately considered in the formulation of the new Wicklow County Outdoor Recreation Plan and the County Wicklow Local Sports Plan that are being developed at present by Wicklow County Council.

Wicklow County Council, in partnership with consultants Cunnane Stratton Reynolds are currently undertaking a 'Seaview Area Masterplan' which will address the future enhancement of the recreational, sports and amenity area at Seaview Avenue. The consultation period closed 13 January 2026 and submissions will be considered, any updates and progress with regard to the development of the Seaview Masterplan will be available on Wicklow County Council's website www.wicklow.ie.

On foot of this submission, no alterations to the LPF are recommended.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.6.3 GREEN SPACE

No.	Name	Issues Raised
55	Cllr Peir Leonard 150524	The submitter requests the following amendment: <i>Prioritise a civic park integrated with the riverside for leisure and community gatherings.</i>
56	Cllr Warren O'Toole 155026	The submitter suggests the LPF should designate new green and open spaces throughout the town for community, social and recreational use.
57	Deirdre Ryan 161402 (on behalf of Arklow Autism Friendly Town)	The submitter suggests that the LPF identify and zone green spaces for social, recreational and community use. It is also suggested that some new developments remain dog free to maintain safe and inclusive spaces for all users. It is suggested that the LPF encourage community participation in the design, stewardship and maintenance of these green spaces.
Chief Executive's Response		
<p>The draft LPF includes a substantial increase in the overall provision of green (open) space from the previous LAP.</p> <p>The Social Infrastructure Audit has identified the minimum zoning provision necessary to cater for a population of 25,000, which has been reflected in the AOS: Active Open Space and OS1: Open Space zonings in the draft LPF. The land use zoning map presents the designations of these green / open spaces which provide for social, community, and recreational uses. There was no shortfall identified in casual play spaces/greenspaces in the Social Infrastructure Audit for both the current and future projected population.</p> <p>Overall, approximately 42ha of land located within the study area provide for sports and recreational related activities and open space and this does not enumerate the significant additional smaller casual play spaces through housing areas.</p> <p>The management of open / green spaces is outside the remit of a land use zoning framework.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B.6.4 RECREATIONAL FACILITIES

No.	Name	Issues Raised
11	Bernard Fox 145338	The submitter suggests that the plan should actively support the creation of new entertainment and leisure facilities including a family entertainment complex with activities i.e. bowling, crazy golf, laser tag, go-karting, providing all weather options
55	Cllr Peir Leonard 150524	The submitter requests the provision of a high-quality outdoor swimming facility within Arklow's open space framework, accessible to all residents and visitors, and integrated with the town's waterfront and open spaces.
Chief Executive's Response		
<p>The CDP and the LPF objectives support and facilitate the provision of a wide range of recreational facilities, for example:</p> <p>CPO 11.1 <i>To promote, encourage and facilitate the development of the tourism and recreation sectors in a sustainable manner.</i></p> <p>CPO 11.2 <i>To ensure that all tourism and recreation developments are designed to the highest quality and standards.</i></p> <p>CPO 11.3 <i>To generally require tourism and recreation related developments to locate within existing towns and villages, except where the nature of the activity proposed renders this unfeasible or undesirable. Within existing towns and villages, the Planning Authority will promote and facilitate the development of tourist related uses at appropriate sites. In all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein.</i></p> <p>The delivery of recreational facilities like bowling and crazy golf is private developer lead and any planning application for such a recreational facility would be considered on its merits in line with the provisions of the CDP and the LPF. The delivery by WCC of community facilities would be more addressed by the Council's Social Development and Climate, Environmental, Recreation and Amenity Sections and is contingent on the availability of funding.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B.6.5 UNIVERSAL DESIGN / ACCESSIBILITY

No.	Name	Issues Raised
22	Elizabeth Battye 183236	The submitter suggests that to fully support the creation of functional and healthy public spaces and pedestrian routes, fully functional matching lighting, suitably surfaced, widened footpaths and segregated cycle lanes should be developed. Universal Design for Living should inform all design for inclusion and public safety.
55	Cllr Peir Leonard 150524	The Draft Social Infrastructure Audit identifies the need for quality public realm.
56	Cllr Warren O'Toole 155026	The submitter suggests the LPF should incorporate inclusive design standards (universal access, sensory zones, rest areas, quiet corners and natural play features).
57	Deirdre Ryan 161402 (on behalf of Arklow Autism Friendly Town)	The submitter suggests the LPF incorporate designated network of walking trails which integrate the principles of universal design <ul style="list-style-type: none"> ▪ Designate and prioritise a town-wide walking trail network linking Arklow's beaches, riverbank, woodlands, parks and residential areas. ▪ Establish a continuous trail around the town. ▪ Integrate universal design principles, ensuring all trails are accessible to people with mobility aids, sensory needs and prams. ▪ Incorporate rest and sensory points, benches, planting and interpretation features highlighting local biodiversity, heritage and culture.
Chief Executive's Response		
<p>Chapter 5 of the County Development Plan sets out a range of 'Design Objectives' that apply directly in Arklow. In particular, Objective CPO 5.23 requires new town centre developments to incorporate the principles of universal design to create an accessible, usable, convenient, and pleasurable environment for all users.</p> <p>In addition, 'Walking & Cycling Infrastructure' Objective ARK 75 of the draft LPF outlines the following: <i>'ensure that all streetscape and public realm improvements follow the principles of Universal Design and consider the safety and perception of public spaces so that all members of the community feel welcome and safe'</i>.</p> <p>The principles of universal design and accessibility within the public realm are incorporated into the CDP and the draft LPF and therefore must be applied to all future public realm developments.</p> <p>On foot of this submission, no alterations to the LPF are recommended</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

4.2.9 Submissions related to Draft LPF (Part B:7) – Heritage, Biodiversity and Green Infrastructure

B.7.0 MARITIME HERITAGE/WATERFRONT AREA

No.	Name	Issues Raised
8	Arklow Maritime Heritage/Arklow Heritage Museum By Hand	The submission requests the following: <ul style="list-style-type: none"> ▪ To provide in the plan the location of a display building to host historic Coastguard Carriages/section of a timber schooner at the Seafarers Memorial Gardens (planning permission granted). ▪ The erection of 2 large display cases to house part of the historic sailing vessel De Wadden at the eastern harbour wall/old Noritake Building entrance, an area of 50m by 10m. ▪ To create a Nautical Mile Walk from the North port area to the South pier with display boards and direction markers. ▪ The erection of an Anchor and display boards on the South Quay marking the site of the original boathouse for Arklow RNLI base, the oldest lifeboat station on the island of Ireland.
11	Bernard Fox 145338	The submission requests the following: <ul style="list-style-type: none"> ▪ Include heritage interpretation that tells the story of Arklow's shipbuilding and maritime past.
36	Keith Scanlon 084456	The submission states support for the submission of the Arklow (and Wicklow) Maritime Heritage Museum.

Chief Executive's Response

Maritime Heritage

Section A.3.4 of the Variation / draft LPF addresses Arklow's Maritime Legacy, referring to both the Arklow Maritime Museum and the Seafarers Memorial Garden. Attention is drawn to Objective ARK 53, which states the following (emphasis added):

*'To protect the historic, traditional **and maritime** character of Arklow Town Centre through the implementation of the following requirements:*

- *All new developments shall provide a high standard of urban design that is reflective of and is influenced by **Arklow's historical maritime** and traditional character.*
- *In the consideration of new development, particular attention shall be paid to ensuring that the character and setting of both protected structures and non-protected but vernacular buildings are maintained and enhanced.'*

Further attention is drawn to Objective ARK 16, which states the following:

'To ensure that any development projects in and around the Arklow quays preserve and enhance any valuable structures or items of Arklow's maritime heritage.'

The CE is satisfied that Arklow's maritime heritage has been recognised in the Variation / draft LPF, with objectives provided for the protection of such.

Specific Projects

SLO 2 states that Seafarers Memorial Garden shall be retained as a focal point for the area. On this basis, it is not considered necessary to indicate the location or specifics of any upgrade to the garden (including display buildings), noting also that the granted permission can be implemented immediately regardless of the content of the LPF.

It is unclear whether Submission No. 8 is requesting that other mentioned projects be carried out by WCC, or whether specific policy support be provided for these projects. In the case of the former, the variation / draft LPF is a land use plan as opposed to an 'action plan' and the inclusion of such would not be appropriate.

In the case of the latter, the listed projects are very specific, such that providing explicit policy support may preclude the proper assessment of any proposal at development management stage (noting that the submission states that planning applications will shortly be lodged). Furthermore, a range of objectives set out in Section B.5 of the draft LPF 'Tourism Development' support the improvement of tourism infrastructure (including signage, etc.) and may be applicable to the listed projects, e.g. Objectives ARK 33 – 36.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.7.1 CULTURAL & CRAFT HERITAGE

No.	Name	Issues Raised
10	Sarah Glennane 183651	The submission requests: <ul style="list-style-type: none"> ▪ That Arklow's craft and cultural heritage, particularly its internationally recognised pottery tradition, should be celebrated as a cornerstone of local identity. ▪ That the development of a recording and orchestral studio facility could also be explored as a capital project.
36	Keith Scanlon 084456	The submission requests the following: <ul style="list-style-type: none"> ▪ Highlight Arklow's original Irish name Inbhear Mór. ▪ Celebrate Wicklow's father of global telecommunications, Capt. Robert Halpin. Co Wicklow should join Valentia Island, Kerry, and Heart's Content, Newfoundland, Canada, in applying for UNESCO Heritage Site status. Consider reviving the Halpin Memorial Medal for Swimming (and lifesaving) in Wicklow schools.
Chief Executive's Response		
<p>In relation to Arklow's craft heritage, with regard to Arklow Pottery, attention is drawn to the text of Specific Local Objective 2, which includes the following:</p> <p><i>'Proposals for this site shall be of a high architectural and landscape quality incorporating some reference to the former use of the site by Arklow Pottery and contribute positively to the streetscape and public realm environment of this area.'</i></p> <p>Furthermore, the Variation / draft LPF includes a range of objectives in relation to the protection of the heritage of Arklow in Section B.7, alongside objectives for the protection of cultural heritage as set out in the Wicklow County Development Plan 2022-2028 (Chapter 8). No further specifics have been provided as to how the Variation / draft LPF might celebrate cultural heritage, noting that a local planning framework is not an 'action plan' but is a land use framework for the assessment of planning applications.</p> <p>Assessing the feasibility of a recording and orchestral studio facility, whether by the Local Authority or a private individual/group, is beyond the remit of a local planning framework. Such a facility would likely be permissible on a range of land use zonings set out in the Variation / draft LPF.</p> <p>In relation to the Irish name for Arklow, this is beyond the remit of a Local Planning Framework and is regulated by the Official Languages Act 2003 (as amended).</p> <p>In relation to Captain Robert Halpin and seeking UNESCO status, this is beyond the remit of a Local Planning Framework.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B.7.2 AMENITY & LEISURE ROUTES

No.	Name	Issues Raised
9	Paul Byrne 84713	<p>The submission requests the following [in relation to this section]:</p> <ul style="list-style-type: none"> ▪ That Objective ARK 84 be altered to include the following text: <i>'To undertake repair and maintenance activities on the existing public walkway situated on top of the existing rock armour embankment coastal defence system that extends from the Caravan Park along the sea side perimeter of Kynock Park & the Duck Pond, to the new Uisce Éireann Wastewater Treatment Plant'</i> ▪ That Objectives ARK 36 and ARK 64 (in relation to the development/maintenance/improvement of greenways and walking/cycling routes) both be altered to include the following text in a list of projects: <i>'Existing walking infrastructure on top of the coastal protection rock armour embankment that extends from the Caravan Park along the sea side perimeter of Kynock Park & the Duck Pond, to the new Uisce Éireann Wastewater Treatment Plant.'</i>
10	Sarah Glennane 183651	<p>The submission states:</p> <ul style="list-style-type: none"> ▪ Concern that the Quarry and Big Rock area are not included in the plan. ▪ There is poor upkeep of this area by quarry management. ▪ The Cove is a safer swimming area than the south beach, and others also use Hanging Rock (Nun's Beach). ▪ It is requested that a comprehensive plan/marine corridor plan for this area be included and consideration given to provide connected walkways linking South Beach to the Cove/Nun's Beach as a key tourist attraction, and heritage connected to Daniel O'Connell. ▪ Despite extensive coastline, there is only a limited stretch of accessible walkway, much of it not wheelchair friendly. ▪ Access to the coastline on the north of the river should be improved with a continuous accessible walkway, including North Beach cove. ▪ The ruined house on the beach should be safely removed or restored, with the cost borne by the property owner.
11	Bernard Fox 145338	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Deliver a continuous public walkway and cycleway from South Quay to North Beach, with viewing points and recreational spaces. ▪ Retain public access to the river and harbour and avoid private, gated developments along the waterfront.
15	Elizabeth Fitzgerald 153136	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ That an 'Avoca River Angler Access and Infrastructure Initiative' be invested in. ▪ This would involve the installation of wheelchair accessible jetties and pathways along the river walk, Day pass fishing licences, Equipment rental/ bait sales, a market place/stalls along the river walk, management of fishing facilities by local fishing shop owner. ▪ The initiative will attract visitors, enhance the tourist reputation of the town, provide an enjoyable amenity for families and people with disabilities, make the most of the Avoca River, promote inclusivity and accessibility.
36	Keith Scanlon 084456	<p>These submissions support plans to protect and restore the Arklow Town Marsh (pHNA) and the expansion of OS2 zoning and urge planners to avoid routing the Arklow– Laragh Greenway through this sensitive ecological area.</p>
44	Carina Holmes 120852	

		It is put forward that this unique urban blue/green lung is irreplaceable and should remain free from roads or development, especially as Arklow is designated a decarbonisation zone.
55	Cllr Pier Leonard 150524	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ New Objective: Coastal Greenway – to develop a high-quality coastal greenway linking South Brittas Bay through Arklow to Clogga and onward to Wexford, providing a continuous walking, cycling, and recreational route that promotes active travel, sustainable tourism, heritage interpretation, and local economic benefit. The following rationale is provided in support of this: ▪ The greenway will enhance access to Arklow’s town centre/North Beach, riverside areas. ▪ It will support local businesses/tourism/attracting visitors from Wexford. ▪ Strong support from the local community

Chief Executive’s Response

Public Access to the River/Waterfront/Accessibility Infrastructure:

New developments along the river frontages will be subject to national guidelines including the Design Manual for Urban Roads and Streets, which includes pedestrian permeability guidelines. Appendix 1 of the Wicklow County Development Plan 2022-2028 states that gated developments will not be permitted, except in exceptions circumstances.

A range of objectives in the Variation / draft LPF refer to pedestrian movement around the quays/waterfront zone, for example SLO2 requires that developments in that area maintain access to the waterfront for marine users, and that the redevelopment of the Arklow Pottery Site shall retain the vehicular access to Arklow Beach and facilitate pedestrian access though the site via a series of new streets and public spaces.

In relation to a proposed ‘Avoca River Angler Access and Infrastructure Initiative’, most of the proposals listed that would involve the development of infrastructure and improvement of the public realm/accessibility would be open for consideration in TC ‘Town Centre’ or WZ ‘Waterfront’ land use zonings, though it is not clear who would be undertaking such works. It is not clear what policy support is requested for such an initiative, and a land use framework has no role in funding or approving specific projects. As referenced below in relation to the Nautical Mile Walk, much of the river walk is indicated as a category of route in the Variation / draft LPF, which may result in improvements (incl. accessibility issues) over the lifetime of the plan – however this would not likely refer to jetties. The submission would rather appear to seek the initiation of an action/project that may be a matter for another section of the Local Authority.

Nautical Mile Walk/Extension of Walkways along Avoca River:

The majority of this suggested ‘Nautical Mile’ amenity route comprises already existing public roads. From an infrastructural perspective, most of the route is already indicated as different categories of route on Map No. 6 Active Travel Strategy, which may result in improvements over the lifetime of the LPF. Furthermore, pedestrian infrastructure will be extended along the South Quay to the south Harbour as part of the Arklow Flood Relief Scheme.

Rather, the creation of such a walk would be a matter of signage and information along its length (whether erected by a community group or another section of the Local Authority) and is outside the remit of a local planning framework.

Walkway to North Beach/Porter's Rock on rock armour:

The coastal revetment was designed as a coastal protection measure in response to the flooding during Hurricane Charlie and was not engineered at the outset to accommodate a walkway. The Council has endeavoured over the years to provide and maintain an amenity walkway, but regular damage / slippage has resulted from storms. The provision of a more stable and permanent walkway would require re-engineering of the revetment, and at this time there is no programme or funding available for such a project. However, the Council will continue where feasible to carry out repairs and to seek funding for a longer-term solution.

In relation to the specific requested alteration to Objective 84, such an alteration would be more appropriate to an 'action plan' or project list by a separate department of WCC, as opposed to inclusion in a land use framework.

In relation to the specific requested alteration to Objectives ARK 36 and ARK 64, it is unfortunately not appropriate at this time to include the specified route in a list of formal walks due to the difficulties experienced in maintaining it.

Arklow – Laragh Greenway:

The Arklow – Laragh greenway concept is set out in the NTA's Greater Dublin Area Cycle Network Plan 2023, which forms part of the GDA Transport Strategy 2022-2042. The CE recognises the concerns raised regarding a potential route through the marsh. While the LTP supports the long-term delivery of this leisure route, the advancement of this route would be contingent on feasibility and SEA/AA assessments to mitigate any potential adverse effects on the pHNA.

Arklow Rock & Cove:

The Arklow Rock/Quarry Area is included in the Variation / draft LPF, with both EX 'Extractive Area' and OS2 'Natural Areas' land use zonings. Further information on the determination of land use zonings in this area is available in the accompanying Green Infrastructure Audit.

Walking routes in this area are referred to in the Variation / draft LPF written statement as 'the Arklow Rock Walking Trail', with Objective ARK 64 stating the following (emphasis added):

'To promote and support the development of enhanced or new greenways and amenity walks at the following locations and require development in the vicinity of same to enhance existing routes and / or provide new links:

- *The Avoca River Walk and Shillelagh to Arklow Greenway Route;*
- *Glenart Woods Forest;*
- *Arklow Seafront and Waterfront Zones;*
- **Arklow Rock Cliff Walk;**
- *Arklow North and South Quays.'*

On this basis, the CE is satisfied that adequate policy support exists in the Variation / draft LPF for the enhancement of, or creation of new, walking routes in this area, noting that a local planning framework is not an 'action plan' and cannot initiate works.

Coastal Greenway Brittas-Arklow-Wexford

The National Cycle Network Plan, published in 2023, aims to develop a network linking cities and towns of over 5,000 people with a safe, connected and inviting cycle network of approximately 3,500km, which will connect more than 200 settlements and 2.8m people.

Corridor 51 of the National Cycle Network sets out a potential route from Enniscorthy to Wicklow via Arklow that would likely fulfil the aim of the suggested coastal greenway, with an option via the R750 being stated as a preferred option. However, indicative/preferred routes along this wider corridor are yet to be developed.

Objective ARK 68 supports the delivery of the National Cycle Network as it relates to the LPF area.

Interurban routes are also indicated on the GDA Cycle Network 2022 north of Arklow to Brittas Bay and South of Arklow towards Courtown. These are integrated into the Variation / draft LPF through the Local Transport Plan as interventions AT24 and AT25 respectively.

On this basis, it is not considered necessary to alter the Variation / draft LPF.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.7.3 BIODIVERSITY

No.	Name	Issues Raised
9	Paul Byrne 84713	<p>The submission requests the following [in relation to this section]:</p> <ul style="list-style-type: none"> ▪ That Objective ARK 56 be altered as follows: <i>'Ensure that development proposals support the protection and enhancement of biodiversity by imposing and enforcing a No Net Loss to Biodiversity requirement for all public and privately funded developments. Development proposals will also support ecological connectivity within the LPF area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geomorphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow.'</i>
28	Marion Reuter 142444	<p>The submission puts forward that</p> <ul style="list-style-type: none"> ▪ The new cycle path along the road from Arklow to the Kish is an environmental disaster. ▪ Environmental protection runs throughout this plan; the Council should ensure it will be implemented
39	Sandra Hall 091725	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ All new developments of any size should have to plant quantities of trees, some on site and pay for planting other areas in Wicklow. ▪ All new housing developments to have dedicated uncultured zones for native plants for biodiversity. ▪ Educate/encourage all homeowners/renters to plant good pollinators, to leave wild areas to encourage biodiversity.
57	Deirdre Ryan/Arklow Autism Friendly Town 161402	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Support biodiversity-friendly landscaping through native planting, wildflower meadows, pollinator zones. ▪ Ensure some new green developments are dog-free except for assistance dogs, to maintain safe and inclusive spaces for all users. ▪ Integrate educational and sensory design elements, supporting intergenerational engagement, outdoor learning and wellbeing programmes.
Chief Executive's Response		
<p>The Variation / draft LPF sets out a considerable number of objectives in relation to the protection of the environment, including biodiversity, and was subject to Strategic Environmental Assessment and Appropriate Assessment. The draft LPF is accompanied by a Green Infrastructure Audit, which was taken as a starting point in the determination of land use zonings, in order to ensure the most sensitive areas were protected at the outset of the LPF process. Furthermore, there has been considerable input from the WCC Biodiversity Officer in the determination of land use zonings, including the commissioning of environmental reports for the protection of specific sites, e.g. Arklow Town Marsh. The CE considers that the land use zonings and objectives of the Variation / draft LPF, alongside the objectives of the Wicklow County Development Plan 2022-2028, provide a robust framework for the protection of biodiversity.</p>		

Submission No. 9 is correct that the Variation / draft LPF does not contain an objective providing for 'no net loss' of biodiversity. While this goal is admirable and the CE supports this in principle, the inclusion and implementation of such a policy, or similar requested requirements for dedicated biodiversity areas, may be practically difficult at this stage of the LPF process. Measuring and assessing 'no net loss' at development management stage would likely involve the development of a complex biodiversity scoring/compensatory system that can be applied to individual sites. Such a procedure does not currently exist in WCC. The development of such a procedure would be most suited to the countywide Wicklow County Development Plan, and this may be considered in the next revision of such in the coming years.

In relation to requirements for tree planting/biodiversity landscaping, Section 1.3 'Protecting Nature & Biodiversity' of Appendix 1 of the Wicklow County Development Plan 2022-2028, which applies in the Arklow LPF area, states the following:

'All development proposals should seek to enhance biodiversity and avoid or minimise loss of existing local habitats and wildlife corridors.'

'Landscaping and biodiversity enhancement plans shall generally be required for new developments, particularly but not limited to those on greenfield sites, and shall be submitted with the planning application. These plans shall highlight existing natural features (such as trees, hedgerows, verges, watercourses etc) to be retained and enhanced, and detail new landscaping and biodiversity enhancement measures including (but not limited to) species, number, size and location of new planting, the provision of swift bricks / boxes or towers, bat boxes, etc and measures to protect ecological corridors, water courses etc. The plan should put an emphasis on the use of native species where possible. Planting schemes shall take account of future maintenance requirements. All landscaping design and management shall be pollinator friendly and generally in accordance with the planting and maintenance approach set out in the Pollinator Friendly Planting Code of the All-Ireland Pollinator Plan.'

In relation to dog-free green spaces, in publicly accessible areas this usually would be a matter of for the Municipal District via signage and enforcement by dog wardens, beyond the remit of an LPF. In some instances the Variation / draft LPF has provided for restrictions to dog access, but this equally is a restriction towards members of the public in relation to biodiversity/wildlife areas, e.g. the following text in SLO5: *'As part of the development of lands adjacent to Arklow Marsh pNHA, the OS2 zoned lands shall be appropriately fenced off and enhanced with dense scrub and woodland planting such that it acts as a natural disturbance barrier to prevent access to the marsh by people or dogs, and a visual barrier to prevent visual 117 disturbance to birds and other protected species and wildlife.'*

In relation to implementation, the policies and objectives of the Variation / draft LPF will be implemented via the development management process.

Initiatives in relation to wellbeing programmes, education/public awareness of pollinator planting is beyond the remit of a Local Planning Framework. Suggested design elements are considered elsewhere in this report.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.7.4 RECORD OF PROTECTED STRUCTURES

No.	Name	Issues Raised
17	Lloyd Hotel Group 093223	<p>The submission requests the removal of Kynoch Lodge (RPS No. A32) from the Record of Protected Structures for the following reasons:</p> <ul style="list-style-type: none"> ▪ The historical importance of Kynock’s Lodge is recognised and valued. ▪ Its listing on the RPS presents limitations for the practical reuse and integration of the property within a larger tourism framework. ▪ Any redevelopment or restoration will retain and enhance the vernacular character of the building, will engage conservation professionals, and will maintain the architectural integrity of the Lodge as part of a broader tourism scheme. ▪ The building was vacant/derelict for 10 years, with significant fire damage, water ingress, and exposure to the elements. ▪ As a vernacular structure it is in itself protected from development without being on the RPS. ▪ Alignment with planning policy: encouraging adaptive reuse and revitalisation of existing buildings, protecting the town’s cultural and building heritage.
34	Fine Gael Arklow & Rathdrum Branch 202828	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Review the preservation order on the Ormond Cinema, which has deteriorated beyond viable restoration. If redevelopment remains unfeasible, it is suggested that the site be repurposed as a public open space capitalising on views of the castle and the Avoca River.
Chief Executive’s Response		
<p>The Proposed Variation does not propose to amend the Record of Protected Structures (RPS) as set out in the Wicklow County Development Plan 2022-2028. Rather, the Variation seeks to incorporate the Draft Arklow LPF within the CDP. While sections of the RPS are listed in appendices of the draft LPF, this is for reference only, and changes to the RPS will not be considered at this time. Revisions to the RPS will be considered at the next overall revision of the Wicklow County Development, the initial stages of which may begin this year. The features referred to in submissions (where clearly identifiable) will be considered at that stage.</p>		
Chief Executive’s Recommendation		
No change to draft Arklow LPF/Variation.		

B.7.5 ARCHITECTURAL HERITAGE

No.	Name	Issues Raised
22	Elizabeth Battye 183236	The submission requests the following: <ul style="list-style-type: none"> Reinstating thatch in the Fisheries end of Arklow should be an element of the redevelopment of the Arklow Pottery site. It was for centuries the vernacular architectural style of the area. Heritage lighting should replace redundant lighting that requires replacement, matching the lighting in that area of the town. Ormonde Castle remains should be revealed and preserved, with controls instituted so that it is not masked by future development.
34	Fine Gael Arklow & Rathdrum Branch 202828	The submission requests the following: <ul style="list-style-type: none"> Install heritage lighting to highlight key landmarks and enhance the town's evening appearance.
55	Cllr Pier Leonard 150524	The submission requests the following: <ul style="list-style-type: none"> Include Arklow Pottery Packing Yard, House on Arklow Golf Links, historic water pumps, historic buildings on South Quay beside Arklow Harbour Office. [Also addressed under Record of Protected Structures above.]

Chief Executive's Response

The Fisheries/Arklow Pottery

The CE is aware of the previous existence of thatched buildings in this area, with old photographs showing such on Harbour Road, Gregg's Hill, etc. However, the existing housing stock in the area largely comprises early 20th century buildings that were never intended to be thatched, such that the re-introduction of thatch may in fact be incongruent with the current character of the area. The redevelopment of the Arklow Pottery site envisions a mixed-use high-density format, which will likely constitute commercial / community / cultural use and apartments. This building typology would not easily allow for the integration of thatch, with the exposed coastal location also possible giving rise to maintenance issues.

With regard to protecting the Arklow Pottery Packing Yard, in order to fulfil the objectives of the SLO 2 (Southern Waterfront regeneration) the redevelopment of this site may not lend to retaining the packing yard, however the LPF provides that: *'Proposals for this site shall be of a high architectural and landscape quality incorporating some reference to the former use of the site by Arklow Pottery and contribute positively to the streetscape and public realm environment of this area.'* On the basis of the above, it is not recommended to alter the LPF in this regard.

In relation to historic buildings on South Quay beside Arklow Harbour Office, the text of SLO2 states the following: *'Any redevelopment proposals west of the harbour shall retain and incorporate the existing buildings on the north western corner as identified on the concept drawing. Proposals for this site shall be of a high architectural and landscape quality incorporating some reference to the former use of the site by Arklow Pottery and contribute positively to the streetscape and public realm environment of this area.'*

It is considered that the above text provides appropriate protection for the heritage assets of the area, including the buildings adjacent to the Harbour Office.

With respect to pumps, there are some cast iron pumps remaining around the town, including one outside the harbour office. These are not protected structures, however the Wicklow County Development Plan provides via Objective 8.20 *'Where an item or a structure (or any feature of a structure) is considered to be of heritage merit (where not identified in the RPS), the Planning Authority reserves the right to refuse permission to remove or alter that structure / item, in the interests of the protection of the County's architectural heritage'* and via Objective 8.25 *'To protect and facilitate the conservation of structures, sites and objects which are part*

of the County's distinct local historical and cultural heritage, whether or not such structures, sites and objects are included on the RPS'.

Heritage Lighting

Significant sections of Arklow Main Street/Ferrybank/Town Centre have decorative heritage-style streetlamps already in situ. Street lighting is managed by the Municipal District and maintained centrally by the public lighting team through a third party contractor.

The suggestion for new heritage lighting objectives are noted however it must be noted that at this time, the Council has no programme or funding source to carry out a heritage lighting scheme in Arklow town, but this will stay under review and funding sought if a funding scheme is made available.

Ormonde Castle

Ormonde Castle is referred to extensively in Section A.3.3 of the Variation / draft LPF, is listed on the Sites and Monuments Record (SMR), and is within the National Monument Service's zone of notification for the historic town of Arklow. A wide range of objectives in both the Variation / draft LPF and the Wicklow County Development Plan 2022-2028 refer to the protection of built heritage, which would be applicable to the Castle. However, there is no specific policy referring to the Castle and, considering its clear heritage value and town centre location, the CE is amenable to including this.

House in Arklow Golf Links

The CE is aware of a vernacular farmhouse type dwelling in this area, which is not currently listed on the Record of Protected Structures. A range of objectives in the Wicklow County Development Plan 2022-2028 refer to the protection of vernacular architecture, for the example the following:

CPO 8.18

'To seek (through the development management process) the retention, conservation, appropriate repair and reuse of vernacular buildings and features such as traditional dwellings and outbuildings, historic shopfronts, thatched roofs and historic features such as stonewalls and milestones. The demolition of vernacular buildings will be discouraged.'

CPO 8.19

'Development proposals affecting vernacular buildings and structures will be required to submit a detailed, true measured survey, photographic records and written analysis as part of the planning application process.'

On the basis of the above, it is not considered necessary to include additional objectives in this regard.

Chief Executive's Recommendation

Include new Objective **ARK X**:

'Development, where relevant, should have regard to the structure and setting of Arklow/Ormonde Castle'.

Update Section B:1.4 to add the following text:

Objectives OP1

- The topographical challenges of this site area recognised. Proposals shall carefully balance the challenges of this site with its highly accessible town centre location whilst been sensitive to its immediate built and natural context, **including Protected Structure (A39 – Former Ormonde Cinema) and the Ormonde Castle National Monument (W1040-029002-Castle - Anglo-Norman masonry castle),**

and its location within an area of Archaeological Significance or Potential (Arklow Town). Proposals shall demonstrate how they accord with the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities.

B.7.6 ALLOTMENTS

No.	Name	Issues Raised
28	Marion Rueter 142444	The submitter raises the following with regard to community allotments: <ul style="list-style-type: none"> ▪ A large influx of new people may bring a wealth of gardening and preserving knowledge to be exploited ▪ Council allotments will make them stakeholders and form stable communities ▪ Allotments will give Arklow a buffer of food security ▪ An area to the south of the mixed development use could be set aside for this purpose ▪ There should be as much emphasis on food security as there is on sports fields. ▪ The reason climate change and biodiversity are pragmatically so important is the fear of the impact on crop production and on food supply.
39	Sandra Hall 091725	The submission requests the following: <ul style="list-style-type: none"> ▪ All new housing estates should have a community garden as part of its green space.
Chief Executive's Response		
<p>Allotments are set out as a typically appropriate use for the OS1 'Open Space' land use zoning. Generally, a land-use framework will not specify precise uses to be developed in each land use zoning, and it is beyond the remit of an LPF to actually deliver such facilities. However, WCC is committed to supporting communal gardening/allotments and carried out an expression of interest in allotments in April 2024 under the remit of the WCC Climate Action Plan. There is sufficient provision of open space zoning in the draft LPF to accommodate this use.</p> <p>Appendix 1 of the Wicklow County Development Plan 2022-2028 also sets out the following in relation to residential public open space:</p> <p><i>'In larger developments (in excess of 1ha), consideration should be given to dedicating part of the residential open space (not exceeding 25% of the total space) to community gardens; at a minimum, landscaping plans will be required to identify a suitable area (in terms of soil type, gradient, light, drainage etc) within the residential open space area that would be suitable for future community garden use by the resident community.'</i></p> <p>On this basis, gardening space (though not necessarily in the format of formal allotments) and community gardens are provided for alongside the delivery of residential development.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B.7.7 SUSTAINABLE URBAN DRAINAGE SYSTEMS

No.	Name	Issues Raised
39	Sandra Hall 091725	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Urban sponge areas. It is put forward the planning bylaws are needed to curtail use of expanses of hard surfaces, instead use of gravel over weed suppressor; that all houses should have grey water systems(retrofit and new). ▪ All houses should also have water butts.
Chief Executive's Response		
<p>Developments must comply with WCC's existing 'Sustainable Urban Drainage Policy', which addresses many of the issues raised.</p> <p>Attention is drawn to Section 1.2.1 of Appendix 1 of the Wicklow County Development Plan 2022-2028, which refers to requirements for water butts.</p> <p><i>All new buildings will be required to incorporate water saving measures, as set out in Section 2 to follow. This may include rain water harvesting for internal service uses. In particular, all new dwellings with individual surface water collection systems will be required to be provided with water butts;</i></p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B.7.8 VIEWS AND PROSPECTS

No.	Name	Issues Raised
55	Cllr Pier Leonard 150524	The submission requests the following: <ul style="list-style-type: none"> ▪ Protected views: Howards Mausoleum (Kilbride) from Arklow Town, South Quay, Avoca River.
Chief Executive's Response		
<p>While the significance of the Howard Mausoleum is noted, it simply would not be possible to protect all and any views of it from the entire town, quays and riverine area, while allowing for the development supported by the LPF and the County Development Plan.</p> <p>It is recommended however that an additional objective be provided that ensures view of the structure from the following main vantage points – from Ferrybank, and local road L-6179 Ticknock – Kilbride, are provided for in the development of SLO5 Kilbride.</p>		
Chief Executive's Recommendation		
<p>Include additional objective to SLO5</p> <p>SLO 5 Kilbride objectives</p> <ul style="list-style-type: none"> ▪ Development of this SLO shall ensure that views of the Howard Mausoleum from Ferrybank, and local road L-6179 Ticknock – Kilbride are maintained where feasible. 		

B.7.9 ARKLOW ROCK

No.	Name	Issues Raised
55	Cllr Pier Leonard 150524	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Protect Arklow Rock Headland; prohibit roadstone blasting.
Chief Executive's Response		
<p>The EX 'Extractive Industry' zoning corresponds to the extractive area of a permission for quarrying, the timeframe of which extends beyond the period of the Variation / draft LPF. Arklow Rock's status as a proposed Natural Heritage Area has been recognised in the Variation / draft LPF and areas outside of this extraction area have been zoned OS2 'Natural Areas' to provide protection from further quarrying outside of the already permitted area and ecological connectivity with other green assets in Arklow. Attention is drawn to Objective ARK 66, which states the following;</p> <p><i>'To promote and facilitate the restoration of the quarry lands at Arklow Rock-Askintinny proposed NHA in an environmentally sustainable way in the event that the existing quarrying use on site ceases.'</i></p> <p>However, having reviewed the objectives in light of this submission, the CE is amenable to altering Objective ARK 57 to provide clarity and correct a typographical error in relation to the pNHAs referred to within.</p>		
Chief Executive's Recommendation		
<p>Alter Objective ARK 57 as follows:</p> <p>'To ensure development is planned in a manner that has appropriate regard to specific ecological sensitivities associated with the Arklow area, including those associated with pNHAs within and around the Arklow LPF area the Arklow pNHA, the Avoca River, coastal habitats and species, and sites suitable for wintering birds. In particular, to ensure the protection and where possible the restoration of the biodiversity associated with Avoca River and its riparian (bankside) habitats. Proposals for development at or in the vicinity of the Avoca River should be informed by ecological surveying and ecological impact assessment.'</p>		

B.7.10 MAP NO. 3 KEY GREEN INFRASTRUCTURE

No.	Name	Issues Raised
55	Cllr Pier Leonard 150524	<p>The submission requests the following:</p> <ul style="list-style-type: none"> ▪ Zoning to facilitate the SPAR Southern Port Access Road needs to ensure that a pedestrian access from Arklow Harbour to Nuns Beach and beyond is maintained. ▪ The break in the 'Green Corridor' is a significant loss of an opportunity to create a first-class coastal active travel pathway from the Harbour / South beach (waterfront zone) to Nun's (Hanging Rock) Beach and possible link onward to Clogga and further. ▪ Whilst it is understood that access is required to Roadstone an integrated active travel path and roadway could be provided [a sketch is enclosed]. The provision of this continuous 'green corridor' could prove a fundamentally key piece of highly attractive touristic investment and as such warrants both zoning (as 'OS2') as such and identification as a 'green corridor'.
Chief Executive's Response		
<p>The Green Infrastructure Audit sets out the approach to green infrastructure in the Variation / draft LPF. Greenways/cycleways may form part of a green infrastructure network as they provide a degree of permeability for some wildlife alongside their primary function. However, this does not infer that all green corridors should therefore also be greenways/cycleways.</p> <p>The primary purpose of the green infrastructure mapping is the provision of ecological corridors and ecological connectivity for wildlife between various habitats, which may include entirely wild areas with no human access. Indeed, human access can be disruptive to the function of ecological corridors and must be carefully managed. The benefit to humans from green infrastructure arises from ecosystem services that can include quite indirect elements, e.g. continued food production arising from healthy pollinator populations, surface water management via riparian corridors, and where appropriate direct recreational benefits.</p> <p>For clarification, it is confirmed that the green corridors on Map No. 3 are not intended to illustrate pedestrian access/greenways. Access to Arklow Rock has been addressed under the heading 'Amenity Routes' above. The green corridor in this area corresponds to, and indeed informed, the OS2 'Natural Areas' zoning on Map No.1. The reasons behind this zoning on Arklow Rock/quarry lands has been set out under the heading 'Arklow Rock' above. The CE is satisfied that the green corridor in the Variation / draft LPF in this area provides ecological connectivity to the wider network around the western edge of the quarry, and no changes are necessary.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

4.2.10 Submissions related to Draft LPF (Part B:8) – Physical Infrastructure

B:8.1 SUSTAINABLE TRANSPORTATION (GENERAL)

No.	Name	Issues Raised
41	Cecil and Julie Alexander 100917	<p>The submitters put forward:</p> <ul style="list-style-type: none"> ▪ Infrastructure is key to the development of any town in order to cope with increasing population, consequently it is key that the necessary infrastructure is in place prior to that increase in population; the big issues are increased traffic, lack of parking facilities, insufficient medical facilities, increased number of schools; ▪ It is well known that there is a housing crisis nationwide and also in Arklow, building high density mixed developments will give rise to increased car ownership, increased traffic, increased car journeys, increased cycle ownership and increased e-scooter ownership and increased numbers of pedestrians. All of these cannot be accommodated on Arklow's urban roads which were designed well over a century ago for completely different purposes. The number of cars will not decrease, but other forms of transport ownership will increase as a supplement to the motor vehicle. Modern infrastructure must be in place before the expected significant surge in the population in the town occurs.
Chief Executive's Response		
<p>The LPF, in conjunction with the Wicklow County Development Plan, sets out a clear policy platform to support the delivery of new infrastructure and services where needed, and sets out numerous general and specific objectives with respect to infrastructural needs in the area. Wicklow County Council is committed to ensuring that new development is only permitted where the necessary infrastructure and services are or will be in place to service that development. The Council is also very conscious of the housing crisis and the need to maximise housing delivery where feasible, and therefore it is not considered appropriate to limit or halt the consideration of all new housing development in the area or to limit density, where it is deemed that infrastructure is or will be available to service any proposed development.</p> <p>The Council is committed to working with all local and state agencies to enhance services in the Arklow area including (but not limited to):</p> <ul style="list-style-type: none"> - With respect to transportation issues: Transport Infrastructure Ireland, the National Transport Authority, Iarnród Éireann, Bus Éireann; - With respect to education and training: Department of Education & Youth, Department of Further & Higher Education, Research, Innovation & Science. - With respect to health infrastructure: the Health Service Executive. <p>In particular with respect to road and transportation infrastructure issues raised, the Council has commissioned a Local Transport Plan alongside this LPF, which sets out in detail the improvements to transportation infrastructure that are required to support the level and types of development support by the LPF. The Council is committed to using its resources, and working with all stakeholders, to ensure infrastructural enhancements occur where necessary.</p>		
Chief Executive's Recommendation		
No change to draft Arklow LPF/Variation.		

B:8.1.1 ACTIVE TRAVEL

No.	Name	Issues Raised
1	Adrian 220425	Submitter objects to use of public funds on cycle lanes and other 'anti-democratic actions against motorists'. He puts forward that the cycle lanes north and south of Arklow are not a success as they are very underutilised and that the "French crossing" signs on the Knockmore roundabout are a joke.
11	Bernard Fox 145338	The submitter suggests that the plan should: <ul style="list-style-type: none"> ▪ Deliver safe pedestrian and cycle routes linking housing areas with schools, shops, and the seafront; ▪ Deliver a continuous public walkway and cycleway from South Quay to North Beach, with viewing points and recreational spaces.
13	Eion J Barnes 221811	The submitter raises concerns about and asks for clarification of the position of the proposed pedestrian bridge from Doyle's Lane, as the proposed bridge would look directly into his property.
14	Barbara Power 224347	The submitter objects to the proposed pedestrian bridge from Doyle's Lane, as the proposed bridge would look directly into her property, would take from her privacy and suggests it should not be directed at a residential area.
22	Elizabeth Battye 183236	The submitter suggests: <ul style="list-style-type: none"> ▪ the proposed pedestrian bridge to the west of the 19 Arches, should provide a continuous cycle route linking schools in Kilbride, Gaelscoil and Gaelcholaiste, and St Joseph's NS, across the river to AGB's Pearse Park, Arklow Rocks, Arklow United FC, Arklow Town FC, the Boxing Club, Arklow CBS, Glenart College and St John's NS; and that the safety of adult and juvenile cyclists and pedestrians should be prioritised; ▪ Building dedicated, segregated cycling facilities on Coolgreany road, linking all schools on the road, Glenart College, St John's NS, Arklow CBS; ▪ Removing the 'pencils' from the roadway to allow clear passage for cyclists.
28	Marion Reuter 142444	The submitter puts forward that the new cycle path along the road from Arklow to the Kish, though well intentioned, is an environmental disaster; old hedges have been removed and replaced with walls, which has impacts on hedgehogs and birds; that the light pollution associated with same is impacting on moths, insects, bats and birds.
34	Fine Gael Arklow & Rathdrum Branch 202828	It is suggested that a safe, dedicated cycling network be established connecting all educational, recreational and sporting facilities.
36	Keith Scanlon 084456	The submitter requests that the location of the pedestrian bridge close to the 19 Arch Bridge be reconsidered and local population is engaged in planning of this needed amenity.
41	Cecil and Julie Alexander 100917	The submitters put forward: <ul style="list-style-type: none"> ▪ Children walking to school sounds great in theory until wet days which creates pandemonium around schools with cars parked everywhere and many rules of the road ignored and putting the general public in danger. ▪ Increasing the number of pedestrian crossing is not a viable solution because many pedestrians choose to jay walk rather than walk 100 metres to the available pedestrian crossing unless there is punishment for not using the nearest crossing. ▪ This will only lead to more urban congestion, drivers losing concentration and being bored, increased number of drivers working while driving, increased number of minor and possibly major accidents, increased

		<p>damage to cars as they are not manufactured to travel most of the time at speeds of 30km/hr or less, increased urban pollution due to engines running and revving and going nowhere fast, increased difficulties with peoples' well-being. Increased frequency of drivers stopping in the middle of the road and letting passengers out as is presently happening outside of our schools, this is illegal and is not being policed and has rapidly become the norm. This is highly dangerous.</p> <ul style="list-style-type: none"> ▪ The new congestion items on footpaths which have rapidly become the norm are the multitude of various coloured wheelie bins. These were introduced by the Council with no guidelines to customers as to when they should be put out, when they should be collected and how long the wheelie bins can remain on the footpath or the road obstructing the use of the footpath by those who are supposed to use it.
44	Carina Holmes 120852	The submitter respectfully requests reconsideration of the proposed footbridge location and call for local engagement in the planning process
46 47	Patrice & David Torbet Elizabeth Cannon 134302	<p>These two submissions relate to two adjoining family properties and raise the same concerns. The submissions draw attention to the LPF Objective ARK72:</p> <p><i>"To overcome overreliance on the Nineteen Arches Bridge and improve pedestrian and cycle connectivity between the north and south of the river, by promoting and supporting the development of;</i></p> <ul style="list-style-type: none"> • <i>The Kilbride Pedestrian and Cycling Bridge between the Avoca River Walk and Arklow Town Marsh/Ferrybank, including associated east-west pedestrian links connecting this crossing with Ferrybank / Dublin Road (short/medium term), the River Avoca Industrial Park (long term) and Arklow to Laragh Greenway (long term) (AT 1, AT 15, AT 19, CY 2)".</i> <p>The submitters highlight that AT19 (Arklow to Laragh Greenway) and AT15 (Marsh Loop) are indicated to traverse through their property at Ferrybank. The submitters indicate that they have never heard of these proposals until now and confirm that as this is private property and their personal private garden areas, it will not be considered by them.</p> <p>The submitters ask for the following to be noted:</p> <ul style="list-style-type: none"> ▪ The proposed access to the walkways is through private lands and gardens and so is not available; ▪ The construction of the flood relief scheme works provides alternative access via the Bridgewater roundabout or over the proposed pedestrian bridge to AT1 all on public lands; ▪ The proposed AT15 pathway through the Arklow Marsh is at complete odds with protection, enhancement and management of the undeveloped, protected natural heritage Marsh and its zoning.
55	Cllr Peir Leonard 150524	<p>The submitter put forward the following suggestions:</p> <ul style="list-style-type: none"> ▪ Remove AT2 Objective from the easterly location and relocate to the western side of the Nineteen Arches bridge for the following reasons and replace it with new objective: <ul style="list-style-type: none"> - This proposal does not clearly show benefit to the vibrancy and flow of active travel and interaction between the town centre / waterfront and Bridgewater. It is unclear as to the benefit of the bridge to draw people to the town centre given its current lack of attractiveness. In order of priority the investment should first focus on the regeneration

		<p>of the town centre (main street and riverwalk) providing support and incentives to building owners alongside the widening of the main street for pedestrian walkability. This would resolve foremost the issue of a declining main street and integrate compactly to the riverwalk (its connecting laneways) and the broader greenway infrastructure.</p> <ul style="list-style-type: none"> - Concurrently the prioritisation of SPAR over this proposal may go in so far as to relieve much of the traffic dominance in so far as to ease pressure on the car traffic on the 19 Arches bridge giving rise to opportunity for the widening of a pedestrian footway / cycle way on the existing bridge. An adjacent bridge would be preferable on the west side of this bridge. The reason for such is the lesser visual impact a new bridge would have on the vantage when viewed from the riverside approached from the sea/harbour (Waterfront Zone SL01 & SL02). - Furthermore the proposed entry / exit point from this bridge spilling onto Doyle's and Condren's lane is inappropriate given these are residential narrow lanes. - From a parking perspective it's challenging to establish the set down points for people crossing in either direction and this proposal will put further pressure on already stretched town centre parking provision. <p>Suggested new objective: <i>"Riverfront Active Travel Bridge & Riverside Public Realm Enhancement.</i> <i>To deliver a new pedestrian and cycle bridge on the western side of the Nineteen Arches Bridge, linking Arklow town centre directly with the riverwalk, enhancing the riverside as a public-realm park-like setting and facilitating safe active-travel access along the waterfront".</i></p> <p>Rationale:</p> <ul style="list-style-type: none"> - The town's approved Arklow Flood Relief Scheme includes substantial public-realm improvements along the Avoca River on River Walk and South Quay - including amenity/viewing areas, public lighting and landscaping. - The riverwalk loop is already a valued asset: <i>"a 3 km Riverwalk loop begins from the edge of the 19 Arches Bridge... a haven for nature lovers"</i> along the Avoca River. - A new active-travel bridge at this western location would brace this amenity by creating a direct, high-quality viewing and amenity zone overlooking the Avoca River, almost like a park by the river, enhancing experience for residents and visitors alike. - By prioritising pedestrians and cyclists over vehicular traffic in this zone, the town can enhance connectivity between the town centre, riverwalk, heritage quarters and waterfront, supporting the place-making and visitor-economy ambitions of Arklow. - The current proposal to locate a connecting bridge via Doyle's Lane or similar may lead to unintended parking and traffic pressures in heritage and residential streets (South Quay, Lower Main Street). In contrast, locating the crossing to the west complements the riverwalk
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		<p>upgrade, offers a purposeful public realm enhancement and facilitates safer, dedicated active-travel access</p> <ul style="list-style-type: none"> ▪ With respect to ARK 68, it is requested that the text be amended to include the following: <i>"To continue promoting and supporting the Safer Routes to School scheme using sustainable measures that respect the heritage character of the town, avoiding the use of plastic bollards."</i> ▪ With respect to ARK 76, it is requested that the text be amended to include the following to this objective: <i>"The creation of a cycle lane and complete the one way system from Harbour Road to Bridge Street via South Quay"</i>. ▪ With respect to ARK 72, it is requested that the text be amended to remove reference to Laragh Greenway. ▪ With respect to ARK 77, it is requested that the text be amended to include the following to this objective: <i>"These links shall be prioritised, designed to high-quality standards, fully accessible, and integrated into the broader town centre regeneration and public-realm improvement programmes"</i>.
57	Cllr Warren O'Toole 155026	<p>The submitter put forward the following suggestions:</p> <ul style="list-style-type: none"> ▪ A designated walking and greenway route should extend from Arklow South Beach along the town boundary, connecting to the Maples and Kish extending to the rear of Knockmóire and onward to Glenart. This corridor would link key residential areas to nature, recreation and the coastline; ▪ A pedestrian bridge from the around the old IFI site linking Glenart to Shelton Woods; ▪ A footbridge at the rear of the People's Park; ▪ An additional foot bridge west of the 19 Arches Bridge, not east as proposed; <p>It is put forward that these connections would create an inclusive, scenic network for walking, cycling and recreation, supporting both residents and visitors.</p>
57	Deirdre Ryan 161402 (on behalf of Arklow Autism Friendly Town)	<p>The submitter puts forward that the LPF should:</p> <ul style="list-style-type: none"> ▪ Designate and prioritise a town-wide walking trail network linking Arklow's beaches, riverbank, woodlands, parks and residential areas; ▪ Establish a continuous trail around the town; ▪ Integrate universal design principles, ensuring all trails are accessible to people with mobility aids, sensory needs and prams; ▪ Incorporate rest and sensory points, benches, planting and interpretation features highlighting local biodiversity, heritage and culture; ▪ Promote safety and accessibility, including lighting where appropriate and clear wayfinding signage throughout the network.
66	Jonathan O'Toole 165620	<p>With respect to Objective ARK72 and AT15 (marsh active travel link) the submitter puts forward that:</p> <ul style="list-style-type: none"> ▪ proposing a purpose-built walkway through the middle of a natural heritage area is at complete odds with protection, enhancement and management of the undeveloped, protected natural heritage Marsh, its ecosystem and its zoning.

- the LPF should focus its resources on improving the existing pedestrian routes and public realm instead

Chief Executive's Response

Footpaths / pedestrian movement

The Council is committed to the improvement of the pedestrian network throughout Arklow, and the LPF objectives fully support the delivery of new and improved walking infrastructure, as detailed in Objectives ARK68 – ARK77. These objectives support improved connections within the town centre, between the town centre and the quays, to amenity areas - particularly along the river and coast (and across the river) - to schools, to residential areas and to public transport locations such as the train station.

With respect to the suggested additional text for ARK77, this is considered reasonable with some adjustment.

With respect to the suggested amenity route from south beach via the Maples / Knockmore and on to Glenart, it is envisaged that such walking and cycling infrastructure would form part of the Southern Port Access Road (Objective AT7) as far as the Knockmore roundabout. From that point, it is objective of the LPF to improve pedestrian and cyclist connections along the Wexford Road, (PY25), Emoclew Road (AT10) and Coolgreaney Road (AT10) to access Glenart forest.

With respect to suggested pedestrian bridges at the IFI site to link Glenart and Shelton and to the rear of the People's Park, the suggested locations are not specified but there is a new pedestrian connection objective in the draft LPF to the rear of St. Mary's Park in the town centre (AT1) and while there is no objective for the Glenart – Shelton suggestion given its distance outside the LPF area, it is possible this is something that could be examined in the context of the Arklow – Shillelagh and Arklow – Laragh greenway projects.

Integrated cycling network

The Council is committed to the improvement of the cycling network throughout Arklow and the LPF objectives fully support the delivery of a new and improved cycling infrastructure, as detailed in Objectives ARK68 – ARK77.

With respect to the issues raised regarding the funding of such infrastructure, the delivery of such improved infrastructure is a Government objective, promoted and funded in particular by the NTA and it is incumbent on Wicklow County Council to avail of all opportunities to improve this important element of the overall network. Projects will be delivered step by step, and while some delivered projects may appear to not currently have high utility, they form part of an overall network that will be delivered in the coming years. All elements will link up in time to provide a comprehensive connected network that will facilitate and support more significant public usage.

With respect to the design of new cycleways, all projects are designed and delivered in accordance with modern engineering and traffic safety standards, and with regard to all other objectives of the Council regarding environmental protection, as set out in the Wicklow County Development Plan.

With respect to the Coolgreaney Road suggestion, the Local Transport Plan (LTP) and draft LPF both include improved cycling infrastructure at this location as a recommendation / objective (ARK69 refers).

Regarding cycling connections between the schools north of the river and south-side locations such as sports grounds and schools, improved connectivity is envisaged using the existing Nineteen Arches Bridge and / or new bridges to the east and west of same, which would allow for this connectivity, using the river walk area as well as the Main Street, the Vale Road and Coolgreaney road (Objectives ARK37, ARK68, ARK69, ARK70, ARK72, ARK73 refer).

With respect to the suggest change to ARK76 in Sub 55 (request for one-way system and complete cycle lane from Bridge Street to Harbour Road), ARK76 clearly sets out that it is an objective to provide for 'active travel' infrastructure on the south quay, being the area from Bridge Street to the Fishing Dock.

The Draft LTP details the vision in more detail stating: *'The Arklow Flood Relief Scheme intends to catalyse the development of the Quays by enhancing the public realm (footpaths, amenity/viewing area, public lighting, parking, planters, and floating pontoon) along the River Walk and South Quay. Much of South Quay will be transformed under this scheme, with cyclists sharing the roadway with traffic-calmed vehicular usage'*.

Therefore no change is deemed necessary.

Safe Access to Schools

It is agreed that access to schools requires improvement and the LPF supports and facilitates the delivery of improved pedestrian and cycling infrastructure to all schools, in particular as detailed in Objectives ARK68 – ARK77.

With respect to the 'pencil' bollards erected near schools, these are erected as part of the "School Zone" initiative designated by the NTA using recognisable design features, such as pencil shaped bollards, colourful road markings and improved footpaths and pedestrian crossings to highlight the presence of the school and encourage traffic to slow down and increase active travel among students.

River crossings

In order to improve pedestrian and cycling connectivity across the river, it is an objective of the LPF (ARK72) to support the provision of 2 new bridges either side of the existing Nineteen Arches Bridge. To the west of the existing bridge, it is hoped that this will be possible to deliver as part of the debris trap structure that will be constructed as part of the flood scheme.

To the east of the existing bridge, it is set out in the draft LPF that this could be in the form of **either** additional capacity added to the existing bridge or the construction of a stand-alone new bridge. No such stand-alone bridge has at this time been progressed forward to design stage and therefore it has not been determined where it might be located, and any concerns rasied about potential impacts on specific locations / properties would be premature. Should such a project move forward, the public will as a matter of course be consulted as a consent process would need to be initiated.

Marsh pathways / Laragh greenway

The indicated routes shown on the transport objectives maps in the draft LPF and draft LTP are indicative only and are subject to more detailed surveys, environmental assessment, consultation and design. No such routes at this time have been progressed forward to design stage and therefore it has not been determined where they will definitively be located and any concerns raised about potential impacts on specific locations / properties would be premature. Should such projects move forward, affected landowners and the public will as a matter of course be consulted as a consent process would need to be initiated.

The CE does not support the suggestion of removing reference to the Arklow – Laragh greenway from objective ARK72. The Arklow Laragh Greenway Route was identified by the NTA as a rural cycle route which could provide a safe cycle link between Arklow and Laragh. It was identified in the NTA's 2013 Cycle Network Plan for the GDA and it was included in the NTA's 2023 Cycle Network Plan where it was classified as a 'Leisure Greenway'.

With respect to potential environmental impacts from these possible projects, the draft LPF provides that:

"To ensure that Arklow Town Marsh, Arklow Sand Dunes and Arklow Rock (proposed Natural Heritage Areas) and other environmentally sensitive sites are protected from adverse impacts arising from any new development and to carefully manage and control the extension of existing development in proximity to these areas. In particular transport proposals which traverse or infringe on the Arklow Town Marsh pNHA, shall be subject to a full Ecological Impact Assessment which fully assesses the potential ecological and environmental impacts of any such proposal on the Marsh during both the construction phase and operational phase of any such proposal".

Traffic Management & Safety

This LPF is a land-use plan and does not address operational traffic management and safety issues per se, but does address the need to ensure new development zones can be adequately serviced by safe movement infrastructure.

Proposed objectives ARK2, ARK73, ARK74 support improved public lighting and wayfinding.

The Council is committed to using its powers through various measures and interventions in the town to improve traffic management and safety for all including vehicle users, motorbikes / scooters, pedestrians and cyclists and this includes the control of items placed on pathways that may impede safe movement (as supported by Objective ARK75)

Universal Design

The Council is committed to implementing Universal Design principles, and this is supported in the draft LPF in Objective ARK75 and in the Wicklow County Development Plan.

Chief Executive's Recommendation

Alter Objective ARK 77 as follows:

To promote and support the delivery of connections which would significantly reduce walking times to Arklow Train Station including but not limited to the following:

- *The provision of a new link/bridge over the railway line between Arklow Train Station and Tesco;*
- *A new pedestrian/cycle link between Yellow Lane and Arklow Train Station;*
- *Improvements to existing pedestrian links between the Main Street and the Train Station in particular Ditch Lane and Tom's Lane.*

These links shall be designed to high-quality standards, fully accessible, and integrated into the broader town centre regeneration and public-realm improvement programmes.

(PT4)

PART B:8.1.2 PUBLIC TRANSPORT

No.	Name	Issues Raised
10	Sarah Glennane 183651	<p>The submitter puts forward that Arklow’s future growth demands significant investment in public transport; with extensive housing developments planned locally and along the N11 corridor, there must be capital investment to improve and increase train services, including staffing of all stations so that trains can pass on the single line.</p> <p>It is also suggested a more equitably priced bus service should also be established, connecting Arklow to main commuter routes with fully accessible services.</p>
11	Bernard Fox 145338	<p>The submitter suggests that the plan should:</p> <ul style="list-style-type: none"> ▪ Provide seasonal shuttle transport linking key points (e.g. train station, Main Street, seafront, and major housing areas). ▪ Enhance public transport connections between Arklow and nearby coastal towns to attract day visitors. ▪ Support improvements to both bus and rail services, ensuring that residents and visitors can easily travel within the town and to nearby centres. <p>In addition the following suggestions are made:</p> <ul style="list-style-type: none"> ▪ Bus routes should be expanded and better coordinated, with more frequent local services connecting residential areas such as Ballyraine Court, the town centre, and the seafront. ▪ Additional bus shelters, real-time information boards, and improved accessibility would make public transport more user-friendly. ▪ The train station should be promoted as a key transport hub, with better pedestrian and cycle access, clear signage, and integrated links to local bus routes. ▪ Iarnród Éireann should be encouraged to increase service frequency and reliability on the Dublin–Rosslare line, as Arklow’s population and commuter base continue to grow.
34	Fine Gael Arklow & Rathdrum Branch 202828	<p>The LPF emphasises Active Travel through improved pedestrian and cycling infrastructure, which is welcomed by the submitters. However, the submitters put forward that there appears to be no provision for elderly or mobility-impaired residents, who are disproportionately affected by the absence of a local bus service and that their needs must be explicitly considered in all transport and movement strategies.</p> <p>The submitters therefore suggest the introduction of a Town Circular “Round Robin” Bus Service, designed to connect residential areas with the town centre, local amenities, and transport hubs; that such a service would greatly enhance accessibility for older residents, people with disabilities, and visitors.</p>
39	Sandra Hall 091725	<p>The submitter suggests:</p> <ul style="list-style-type: none"> ▪ A local bus service is a necessity to get many out of cars including school children. ▪ The bus and train service to Dublin, Wexford and Carlow needs to be efficient and dependable. ▪ Bus links to DART would be a great initiative, free to all.

Chief Executive's Response

The Council is not a direct provider of public transport services. The Council is committed to working with public transport agencies and providers, such as Transport Infrastructure Ireland, the National Transport Authority, Iarnród Éireann and Dublin Bus / Bus Éireann to improve public transport services in the area, as set out in Objective ARK78 of the LPF to follow.

The Draft LTP supports the enhancement of regional bus networks and the future provision of a dedicated town bus service, to be developed with the NTA.

The LTP also supports the development of the train station as a transport hub, and supports collaboration with Wexford County Council, Irish Rail and the NTA to consider the long-term feasibility of upgrading Arklow's rail service to align with recommendations set out in the Government's All Island Strategic Rail Review (AISRR).

ARK78

To cooperate with NTA, Iarnród Éireann and other relevant transport planning bodies in the delivery of a high quality, integrated and accessible transport system in the LPF area. In particular to support and facilitate the following schemes / programmes:

- *The improvement of mainline train services as set out in the Government's AISRR, including (but not limited to)*
 - *The introduction of an hourly shuttle service between Wexford-Greystones-Arklow;*
 - *The delivery dual tracks between Dublin and Wexford on a phased basis, serving Arklow in the long term.*
- *To support and facilitate improvements to Arklow Train Station as funding allows including the provision of a new footbridge with lifts to improve accessibility to both north and southbound services.*
- *The improvement of existing and provision of new bus services within the LPF area and linking the LPF area to the wider region (but not limited to):*
 - *Supporting the development and delivery of bus service enhancement projects, and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;*
 - *Facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted).*
 - *To support the development of a future dedicated town bus service for Arklow and Environs to support Arklow's long term planned growth (PT 1 - 3).*

In addition, the public transport improvement support objectives of the Wicklow County Development Plan will also be implemented in Arklow, particular:

CPO 12.2 *Through sustainable planning and investment in transport infrastructure, including roads and public transport systems, to reduce journey times, length, congestion and to increase the attractiveness of public transport.*

CPO 12.4 *All planning applications for large employment based developments and/or trip intensive developments, where the Planning Authority considers that a significant peak and/or off peak travel will be generated, are required to include a Mobility Management Plan.*

CPO 12.5	<p><i>New significant residential or mixed use development proposals¹ shall be required to be accompanied by an 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car</i></p> <p><i>(a) local services including shops, schools, health care and recreational facilities, and</i></p> <p><i>(b) public transport services.</i></p> <p><i>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.</i></p>
CPO 12.20	<p><i>To cooperate with NTA and other relevant transport planning bodies in the delivery of a high quality, integrated and accessible transport system in County Wicklow.</i></p>
CPO 12.21	<p><i>To promote the development of transport interchanges and 'nodes' where a number of transport types can interchange with ease. In particular:</i></p> <ul style="list-style-type: none"> ▪ <i>to facilitate the development of park and ride facilities at appropriate locations along strategic transport corridors which will be identified through the carrying out of required coordinated, plan-led transport studies and consultation with the appropriate transport agencies and/or Regional Authority;</i> ▪ <i>to support and facilitate the enhancement of the strategic park and ride at Greystones as identified in the RSES;</i> ▪ <i>to enhance existing parking facilities at / near and the improvement of bus links to the train stations in Bray, Greystones, Kilcoole, Rathdrum, Wicklow and Arklow;</i> ▪ <i>to require electric vehicle charging points to be incorporated into all car parks at public transport nodes;</i> ▪ <i>to promote car sharing parking spaces at premium locations in car parks;</i> ▪ <i>to promote the linkage of the Luas extension or other mass transit to Bray town centre, Bray train station and Fassaroe;</i> ▪ <i>to promote the Luas extension from City West / Tallaght to Blessington;</i> ▪ <i>to support the enhancement of public transport services and infrastructure in West Wicklow and in particular to support the improvement of bus service / bus priority on the N81, bus linkages to rail stations and the development of park-and-ride facilities at strategic locations;</i> ▪ <i>to encourage the improvement of bicycle parking facilities at all transport interchanges;</i> ▪ <i>to improve existing and provide new footpath / footway linkages to existing / future transport interchange locations;</i> ▪ <i>to support the development of bus shelters and bicycle parking facilities where possible; and</i> ▪ <i>to promote and support the development of fully accessible public transport services and infrastructure, that can be used by all people, regardless of their age, size, disability or ability.</i>
CPO 12.22	<p><i>To continue to work with Iarnrod Eireann and the NTA on the improvement of mainline train and DART services into Wicklow and in particular:</i></p> <ul style="list-style-type: none"> ▪ <i>to facilitate all options available to increase capacity through Bray Head;</i> ▪ <i>To support the delivery of the DART+ programme; and</i>

¹ Being defined as developments in excess of 50 units of housing / more than 50 employees in any settlements in Levels 1-4 in the hierarchy, 25 units / employees in Levels 5-10, and **all developments** in excess of 500m distance to a public transport service, as well as other format / sizes / locations are may be deemed necessary by the Local Authority.

- To support electrification of the rail line south of Greystones and the provision of high speed and high frequency services on the existing underutilised south east rail line to south Wicklow.

CPO 12.23

To ensure the continued and long term operation of and improvement of the Dublin – Rosslare line, including the re-opening of closed stations, are maintained and to ensure that land uses adjacent to former stations are appropriate and can facilitate future improvements. In particular:

- to ensure coastal protection measures are put in place to protect the railway line from coastal erosion and to consider identifying corridor options for route continuity in the event of coastal land loss;
- to resist any development within 20m of the railway line;
- to resist demolition or removal of any former train station structures or apparatus, other than for safety reasons; and
- to require any development proposals in the vicinity of former train stations to be so designed to facilitate future access to the station and to reserve adequate space for future car parking.

CPO 12.26

To promote the delivery of improved and new bus services both in and out of the County but also within the County by:

- supporting the development and delivery of bus service enhancement projects, including BusConnects and measures to improve bus priority such as additional bus lanes and priority signalling etc as may be deemed appropriate;
- facilitating the needs of existing or new bus providers with regard to bus stops and garaging facilities (although unnecessary duplication of bus stops on the same routes / roads will not be permitted);
- requiring the developers of large-scale new employment and residential developments in the designated key towns in the County that are distant (more than 2km) from train / Luas stations to fund / provide feeder bus services for an initial period of at least 3 years;
- promoting the growth of designated settlements to a critical mass to make bus services viable and more likely to continue;
- provision of bus lanes on M11 / N11;
- to work with Bus Eireann and the NTA to improve services in south and west Wicklow.

CPO 12.27

To support and facilitate the existing service providers and encourage the further development of the Local Link Rural Transport Programme (and any other or subsequent rural transport programmes).

CPO 12.28

In accordance with 'Our Rural Future Rural Development Policy 2021 – 2025' support and facilitate the delivery of improved rural public transport services and ensure that public transport services in rural areas are accessible to persons with disabilities.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

PART B:8.1.3 CAR PARKING

No.	Name	Issues Raised
6	Edward Breen	The submitter raises concerns about the availability of park long term / all day on Upper Main Street. He suggests this results in no parking being available for shorter term users such as shoppers, thereby impacting on the retail trade on this part of the town. Suggests car parking in this area should be reduced to 20 minutes or set down only; that this would free up many spaces and help to revitalise the town centre.
23	Aleksandra Chromik 210440	The submitter puts forward that a multi storey car park is needed in the town centre
34	Fine Gael Arklow & Rathdrum Branch 202828	It is suggested that adequate parking management and accessibility features are provided for those unable to rely on active travel modes.
41	Cecil and Julie Alexander 100917	The submitters put forward: <ul style="list-style-type: none"> ▪ A park and ride facility would be of benefit provided the service was efficient, the park facility must be within a short distance to the town and the service be free. This service will not help people who are doing serious shopping who will need car parking facilities in the town. ▪ Additional car parking facilities are required and a multi storey car park would in a suitable location would greatly help.
55	Cllr Peir Leonard 150524	<p>The following new objective is suggested:</p> <p><i>“Strategic Parking, Set-Down & Transport Infrastructure</i> <i>To prioritise the development and optimisation of off-street car-parking facilities in or adjacent to the town centre so that on-street, all-day parking - especially in heritage-sensitive areas such as Lower Main Street and The Brook can be relocated. On-street spaces in business and heritage streets shall be managed and repurposed to favour set-down/drop-off areas, short-stay visitor parking and active loading rather than long-stay parking. Concurrently, ensure the delivery of upgraded public-transport infrastructure (e.g., covered bus shelters, seating and a park-and-ride facility) to support sustainable access to the town centre”.</i></p> <p>Rationale</p> <ul style="list-style-type: none"> - The draft planning documents for Arklow state that <i>“using space on streets for car parking ... is considered to be an inefficient use of this space which detracts from the public realm and takes road space away from pedestrians and cyclists.”</i> - The documents recommend to <i>“avail of opportunities to remove public on street car parking on the Main Street and at amenity areas, subject to due consideration of the commercial needs of Main Street, including loading parking”</i> and to <i>“require new development ... to incorporate pedestrian links ... to existing or new public car parks.”</i> - Prioritising set-down/drop-off zones in busy or heritage streets helps reduce long-stay congestion, improves the streetscape, promotes active transport, and aligns with objectives of high-quality public realm in heritage-areas. - Enhancing park-and-ride and bus stop infrastructure complements the reduced demand for long-stay on-street parking, supports sustainable travel, and improves access for commuters and visitors alike.

Chief Executive's Response

Car parking in Arklow has been assessed in some detail in the draft Arklow Local Transport Plan. The studies and surveys carried out do not find that the provision of a multi-storey car park in the town centre is necessary at this time, and that there is generally good capacity in the existing public car parks on and close to the Main Street.

As set out in the draft LPF, while on-street car parking is not generally present for the majority of Main Street from the Nineteen Arches Bridge to St. Mary's and St. Peter's Church to the south, in all other locations in the town centre a significant proportion of the public realm is given over to car parking. Using space on streets for car parking, particularly when there are other parking opportunities available, is considered to be an inefficient use of this space which detracts from the public realm and takes road space away from pedestrians and cyclists.

The Draft LTP recommends that the following measures are undertaken to rationalise car parking in the town centre and improving the public realm for pedestrians/shoppers coming to Arklow town centre:

- *Optimise the use of existing off-street car parking provision;*
- *Discourage the provision of additional on and off-street parking areas;*
- *Upgrade walking routes and crossing points from existing off-street parking areas to key services;*
- *Improve directional signage and lighting for night-time uses of all off street car parks;*
- *Identify opportunities within the surface car parking areas for better place-making and green infrastructure.*

In this regard, the objective suggested in Sub 55 is considered reasonable with some amendments, and it is considered it would also address long stay car parking on Upper Main Street, identified as a concern in Sub 6.

It should be noted that it is planned to review the local parking byelaws in 2026.

It is identified in the draft LPF that there is currently no official 'park and ride' facility for bus commuters in Arklow and that informal parking occurs along the R772 north of Junction 20 at the Wexford Bus Stop. This location is outside the LPF area; however it is noted that the County Development Plan supports the provision of park and ride facilities. In this regard Wicklow County Council is working with the NTA to determine locations for park and ride facilities along primary routes such as the M11/N11 and a site has been reserved and zoned Public Utility (PU) just south west of Junction 20 within the LPF boundary. In this regard, the draft LPF includes the following objective:

ARK 79: To support and promote the delivery of Templeraíney Park and Ride at Junction 20 of the M11 (PK 1)

With respect to accessibility, the Council is committed to ensuring that car parking is provided for those with accessibility needs; County Policy Objective 12.57 in the Wicklow County Development Plan set out that *'Provision shall be made in all new / expanded developments for Age Friendly and Disabled parking (and associated facilities such as signage, dished kerbs etc) at a suitable and convenient location for users'*.

In addition, in Appendix 1 of the County Development Plan it is set out that 'Universal Design and Accessibility' will be an overarching requirement of all new development in the County. The plan states:

'Universal Design is the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability' (National Disability Authority)². This includes streets, parks and public spaces. The design of the built environment can significantly influence a person's ability to have a healthy and active lifestyle or one characterised by limited mobility and high levels of social isolation³. Universal Design therefore requires an appreciation of the varied abilities of every person to ensure that places and buildings are designed to meet the needs of all users.

In considering access for those with a disability, the Planning Authority will adhere to the criteria set out in the Building Regulations, 1997, (or as subsequently amended), and other relevant documents, such as:

- *"Building for Everyone", National Disability Authority*
- *"Best Practice Access Guidelines, Designing Accessible Environments", Irish Wheelchair Association 2014*
- *"Universal Design Guidelines for homes in Ireland", National Disability Authority 2015*

'Building for Everyone – A Universal Design Approach'⁴, provides practical guidance on the universal design of buildings, places and facilities and advocate that designing for one group can result in solutions that address the needs of many others. For example:

- *'level entry (step-free) entrances facilitate not just wheelchair users but also people with buggies, people with suitcases or shopping trolleys, people using walking or mobility aids, and people with visual difficulties;*
- *larger toilet compartments provide easier access to wheelchair users; those with luggage or parcels; parents with pushchairs or accompanying small children; those using walking or mobility aids; and larger-sized people;*
- *clear, well-placed signage that uses recognised symbols or pictograms helps people with reading or cognitive difficulties, and those whose first language is neither English nor Irish'.*

In order to overcome challenges posed by topography or existing built environment constraints, universal design should be considered at the earliest design stages. The design of the built environment should be easy to understand.

Having regard to the current and future demographic trends, proposed developments should be future proofed for an ageing population; the Planning Authority will advocate age-friendly thinking with respect to new developments in the County in particular at pre-planning stage. Developers should consider an Age-Friendly approach, with facilities and materials inclusive of an age-friendly community/society.

Chief Executive's Recommendation

Add new objective as follows

ARK-XX To support the development and optimisation of off-street car-parking facilities in or adjacent to the town centre so that on-street, all-day parking can be relocated. On-street spaces shall be managed and repurposed where feasible to favour set-down/drop-off areas, short-stay visitor parking and active loading rather than long-stay parking.

² National Disability Authority, an independent statutory body that provides information and advice to the Government on policy and practice relevant to the lives of persons with disabilities.

³ How walkable is your Town? (Age Friendly Ireland, 2015)

⁴ Published by the National Disability Authority

PART B:8.1.4 ROADS & TRAFFIC MANAGEMENT

No.	Name	Issues Raised
11	Bernard Fox 145338	<p>The submitter suggests that the plan should:</p> <ul style="list-style-type: none"> ▪ Expedite the Arklow Relief Road to divert heavy and through-traffic from Main Street. ▪ Advance planning for a second bridge over the Avoca River to relieve pressure on the existing one and improve connectivity between north and south Arklow.
22	Elizabeth Battye 183236	<p>The submitter suggests:</p> <ul style="list-style-type: none"> ▪ that to reduce and slow traffic through the town centre, WCC should lobby TII to provide an interchange from the Vale Road onto the N11 between junctions 20 and 21. ▪ to make the town centre more active travel friendly, vehicular traffic should be routed away from Main Street; that a vehicular traffic route should be built from the Vale Road to skirt the Avoca river, joining the River Walk and providing access to the north-bound carriageway of the 19 Arches bridge (and there should be suitable footpaths and cycleways following this route). To extend the circularity of this proposal, south-bound traffic from the 19 Arches bridge should be fed into a new road opposite Bridge Street skirting the Abbey graveyard, entering Castle Park towards the Garda Station for distribution. Combining these two measures would allow the Main street to widen footpaths, have one-way vehicular traffic and segregated cycle lanes.
23	Aleksandra Chromik 210440	<p>The submitter puts forward that the town needs a second bridge, not for pedestrians, but for cars.</p>
34	Fine Gael Arklow & Rathdrum Branch 202828	<ul style="list-style-type: none"> ▪ The submitters welcome the proposal to progress the Southern Port Access Route (SPAR) and the associated upgrades to the supporting road network and acknowledge its importance in diverting heavy goods vehicle (HGV) traffic from the Nineteen Arches Bridge and the town centre. However, the submitters suggest that the route alignment be relocated further inland, to mitigate future risks arising from coastal erosion and the effects of climate change as this would future proof the investment and ensure long-term resilience of the town's transport infrastructure (submission includes a map with suggested route); ▪ With respect to a second vehicular bridge over the Avoca River; the submitters point out that while the draft plan states that the feasibility of a second vehicular bridge will be explored "<i>in the longer term</i>" they believe this approach is insufficient. They suggest the need for a second bridge is immediate and urgent and therefore urge that the feasibility, design, and environmental studies for a new vehicular crossing be undertaken as part of this current plan, not deferred to a future review. It is put forward that the proposed Beech Road–Kilbride–Vale Road link offers an ideal alignment for this crossing and they strongly advocate that this becomes a vehicular bridge, not merely a pedestrian or cycling route. It is put forward that when connected to a new junction on the N11, this route would dramatically reduce congestion in the town centre and revitalise Main Street and its environs (submission includes a map with suggested route). ▪ It is suggested that through traffic should be re-routed away from the Main Street to create safer, more pedestrian friendly town centre.

36	Keith Scanlon 084456	The submitter requests that in the development of the Southern Port Access Road, biodiversity areas, coasts, and beaches be prioritised, protected and restored.
37	Brian Brennan TD 091304	<ul style="list-style-type: none"> ▪ The submitter puts forward that the key to sustainable transportation in Arklow is the delivery of a second vehicular bridge between the 19 Arches and the M11 bridge to the west, continuing onto the Western Distributor Road which would have a game-changing impact on the town centre, removing congestion, improving safety for cyclists and pedestrians and open huge possibility for a vibrant and active town centre. ▪ The submitter points out that the project has been re-evaluated as a long-term option in the Draft LPT due to the requirement of "<i>further feasibility and environmental/ ecological studies (particularly as the Arklow town marsh is a pNHA and the principal wetland area in Arklow), as well as stakeholder and traffic/transport assessment would be required before such a project could be progressed</i>". The submitter would urge that these studies and assessments be conducted as a matter of priority in order to allow for progression of this project at the very least in the medium term.
39	Sandra Hall 091725	<ul style="list-style-type: none"> ▪ The submitter puts forward that N11 should be a one way loop through Castle Park rejoining Main Street just below St Mary and Peter Church, to allow for a more pedestrian friendly Main Street (Note: this may refer to the 'old N11' which is now the R772) ▪ The submitter would like to see a new street created between and parallel to the river and the Main Street, allowing small shops and cafes in a car free zone.
41	Cecil and Julie Alexander 100917	<p>The submitters put forward:</p> <ul style="list-style-type: none"> ▪ Arklow is a very old fishing town with narrow streets with plenty of bottlenecks - trying to modernize the town and expand it using the old network of roads and streets and existing footpaths will not work to cope with the increased traffic and increased supplemental transport, such as bicycles, scooters, wheel chairs, e scooters and motorized wheelchairs for people with disabilities. ▪ It is well known that there is a housing crisis nationwide and also in Arklow, building high density mixed developments will give rise to increased car ownership, increased traffic, increased car journeys, increased cycle ownership and increased e scooter ownership and increased numbers of pedestrians. All of these cannot be accommodated on Arklow's urban roads which were designed well over a century ago for completely different purposes. The number of cars will not decrease, but other forms of transport ownership will increase as a supplement to the motor vehicle. ▪ Tinkering around the edges is not a viable solution, e.g. reducing the speed limits to 30km is also not a viable solution when e scooters are capable of achieving those speeds and in some cases greater speeds. ▪ Only essential traffic should be allowed through the town, traffic should be diverted from Templeraíneý coming into the town and from the Knockmore roundabout coming into the town onto a new ring road which should be constructed immediately as the current non compliant roundabouts cannot cope with the current traffic volumes including public transport and heavy duty traffic. Upper Main St is an example of this as the narrowest part of the street at Chinese restaurant, Fun Palace cannot cope when two Public transport Expressway buses meet, the traffic comes to a standstill and congests back to the substandard

		roundabout at the junction of the Vale Rd, Coolgreany Road and the Wexford Rd. An opportunity was missed by the officialdom when the Arklow By Pass was being constructed and a councillor proposed a 3rd exit junction off the M11 to service Arklow Central which was rejected. A 2nd bridge across the Avoca River would be a big benefit as would use of more of the Riverwalk being accessed by traffic with new entry and exit points.
44	Carina Holmes 120852	The submitter puts forward that as the Southern Port Access Road progresses, biodiversity, coastal habitats, and beaches must be prioritised and restored—not compromised; that these natural assets are central to Arklow’s environmental resilience and long-term wellbeing.
57	Cllr Warren O’Toole 155026	The submitter put forward the following suggestion: <ul style="list-style-type: none"> ▪ A road bridge from the Kilbride side across the river to Vale Road, improving traffic flow and access.
66	Jonathan O’Toole 165620	<ul style="list-style-type: none"> ▪ The submitter puts forward that while it is encouraging to read that the LPF seeks to reinvigorate the town centre; highlights the needs for public realm improvements on the Main Street and acknowledges that high volumes of traffic passing over the 19 Arches Bridge and through the town centre needs to be reduced, it is surprising that the framework discounts the construction of new vehicular infrastructure over the river to alleviate traffic congestion and focuses more on the addition of additional pedestrian bridges instead. ▪ He notes that the existing 19 Arches Bridge is ideally located and provides safe and secure route for pedestrians across the river and that additional pedestrian crossings on either side of the existing bridge will not reduce car dependency or lower traffic volumes, but providing an alternative vehicular route around the town and inside the bypass would. ▪ The submitter considers that with the future expansion of the town in SLO3, SLO4 and SLO5 neighbourhoods and the potential for over 2,000 new homes in these areas alone, an additional vehicular bridge across the Avoca river must be considered.

Chief Executive’s Response

Southern Port Access Road (SPAR)

It is suggested that the route of the SPAR should be further inland to mitigate future risk associated with climate change. The indicated route shown on the transport objectives maps in the draft LPF and draft LTP is indicative only and will be subject to more detailed surveys, environmental assessment, consultation, design and consent. The SPAR route at this time has not been progressed forward to design stage (this is programmed for later in 2026) and therefore it has not been determined where it will definitively be located and any concerns raised about potential impacts, for example on biodiversity or the coast, would be premature.

Western Distributor Road

Road objectives included in the draft LPF aim to provide alternative routes for through traffic, in particular HGVs wishing to access the Roadstone Quarry and Arklow Port. The development of a Southern Port Access Route and associated upgrades to the existing supporting road network either end of the proposed SPAR route would serve to remove significant HGVs from the Town Centre and reduce overall traffic volume. This roads project, in conjunction with the objective for two new active travel bridges crossing the Avoca River, would further enhance the pedestrian / cycle environment of the Town Centre and enhance connectivity

between the north and south of the town and most significantly provide a direct pedestrian connection between the Main Street and the Bridgewater Shopping Centre.

In the longer term it is an objective of the draft LPF and the draft LTP to investigate the feasibility of a second vehicular crossing point over the Avoca River between the Nineteen Arches Bridge and the M11. Further study will be needed to determine the need and optimal location for such a crossing including full feasibility and ecological studies, stakeholder engagement and traffic and transport assessments. Such studies will be progressed in the short to medium term.

Third M11 Interchange

The Wicklow County Development Plan and LAP 2018 identified the potential provision of a third interchange at Lamberton along the Arklow bypass linking the M11 to Vale Road. However, at this time there are no plans by TII to deliver this objective, and therefore it has not been carried forward as an objective in this draft LPF.

Riverine Distributor Road

A road running from Vale Road as far as the Nineteen Arches Bridge along the south side of the river has been suggested in submissions. While the logic of the suggestion is understood (traffic from the west could by-pass the Main Street), this proposal is not considered realistic or desirable, as it would require significant alteration / destruction of either the riverine environment or structures / build infrastructure to the rear of Main Street. The provision of an additional road for vehicles at this location is not considered compatible with national policy including the Modal and Intervention Hierarchy contained within the National Investment Framework for Transport in Ireland (NIFTI) that prioritises intervention in active travel and improvements of existing transport assets before consideration of new infrastructure. There are a number of obvious challenges to its delivery including topography, significant flood risk, private land ownership, impact on the River Avoca and other WCC proposals including flood protection, active travel and conflict with the Arlow-Shillelagh Greenway. The improvement of the river frontage between Vale Road and the Nineteen Arches Bridge including pedestrian priority, safety, lighting and activation of land uses is supported throughout both the LTP and LPF.

High-density, mixed-use developments

The provision of high-density, mixed-use developments in accessible areas such as town centres and within proximity of existing or planned public transport is consistent with compact growth principles and national, regional and local policy objectives. The LTP/LPF accordingly seeks to ensure that residential and mixed-use development to meet growth targets are located in accessible areas within Arklow and have identified a comprehensive set of multi-modal (active travel, public transport, road and parking) improvements to cater for this growth. The reduction of the posted speed limit to 30km (or less) in town centres and within the vicinity of schools is supported through national policy and is a widely-used policy tool to support the viability, safety and enhancement of town centres. It is noted that the legal speed limit for e-scooters is 20kmph under the Road Traffic (Electric scooters) Regulations 2024.

Other road / traffic routing suggestions

It is suggested that a new vehicular road could be built directly opposite Bridge Street linking to Castle Park. While the logic of the suggestion is understood this proposal is not considered realistic or desirable, as it would require significant removal of buildings along Main Street, many of which are of heritage / streetscape value and would entail works through an area of designated as one of archaeological potential or significance where archaeological finds have recently been made.

Through the LTP, the development of an additional road linking Bridge Street to Castle Park was not considered compatible with other objectives including but not limited to, enhancement of the town centre, safety and negative impact on its streetscape. The enhancement of the laneways and other routes between Main Street and Castle Park is supported throughout the LTP (Laneways Strategy).

It is also suggested that a new car free route be provided in this location; it is the objective of this LPF to achieve the delivery of a pedestrian priority (but not completely car free) area along the river, which would support the development of new businesses facing onto the riverwalk (ARK2, ARK74 refer).

It is agreed that re-routing traffic away from the Main Street would allow for the creation of a safer, more pedestrian friendly town centre. A one-way system was trialled in Arklow in 2022 to facilitate the development of the URDF-funded Parade Ground public realm scheme, however its continuation was not supported at the time. However, this proposal could be revisited in the long-term coupled with an ambitious Main Street public realm scheme that seeks to reallocate existing road space to support footfall and town centre vitality. This would be a matter for the Municipal District to initiate.

With regard to the suggestion that a one-way loop system should be installed on Main Street and Castle Park, a one-way system was introduced in Arklow in 2013/2014 on a three-month trial basis and it was mostly reversed. Some of it remains in place at Lower Main Street, Castle Park and Dunnes Lane. It is unclear what is meant by the one-way loop at Castle Park as both the car park and the street itself have a one-way system in place. Similarly, the Main Street car park has a one-way system for in/out.

It is noted that the junction of Vale Road, Coolgreaney Road and the Wexford Road is identified as in need of upgrade in the LTP.

A third access to the M11 is not supported by national policy or Transport Infrastructure Ireland who has ultimate responsibility for the management of the national roads network.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

PART B:8.2 FLOODING & COASTAL ZONE MANAGEMENT

No.	Name	Issues Raised
9	Paul Byrne 084713	<p>With respect to Objective ARK84, it is suggested that the following objective be added:</p> <ul style="list-style-type: none"> ▪ <i>To undertake regular repair and maintenance activities on the existing public walkway situated on top of the existing rock armour embankment costal defence system that extends from the Caravan Park along the sea side perimeter of Kynoch Park & the Duck Pond, to the new Uisce Éireann Wastewater Treatment Plant.</i>
<p>Chief Executive’s Response</p>		
<p>The suggestion made would not be a planning policy matter, but rather an operation issue for Arklow Municipal District, and therefore would not be appropriate to include in the LPF.</p> <p>However, it should be noted that the coastal revetment was designed as a coastal protection measure in response to the flooding during Hurricane Charlie and was not engineered at the outset to accommodate a walkway. The Council has endeavoured over the years to provide and maintain an amenity walkway, but regular damage / slippage has resulted from storms. The provision of a more stable and permanent walkway would require re-engineering of the revetment, and at this time there is no programme or funding available for such a project. However, the Council will continue where feasible to carry out repairs and to seek funding for a longer-term solution.</p>		
<p>Chief Executive’s Recommendation</p>		
<p>No change to draft Arklow LPF/Variation.</p>		

PART B:8.3 ELECTRICITY SUPPLY & RENEWABLE ENERGY / WIRED SERVICES

No.	Name	Issues Raised
22	Elizabeth Battye 183236	<p>The submitter suggests:</p> <ul style="list-style-type: none"> ▪ Eliminating street clutter by using existing and new underground ducting to eliminate visible cabling. ▪ Utilising a unified lighting motif in particular areas; lighting that is unified in style, size, colour, energy efficient and easily maintained should be matched within geographic areas; and redundant fixtures attached to lighting and other poles should be removed. ▪ Excess heat from the Data Centre in Kilbride should be repurposed for a Municipal Heating System to service adjacent zoned residential land and existing residences.
55	Cllr Peir Leonard 150524	<p>The submitter suggests the following new objective:</p> <p><i>"To ensure that all future public-realm works in Arklow town centre (including lighting, street furniture, paving and signage) are carried out in a holistic, locally distinctive manner which advances high-quality design, reduces visual clutter, reinforces the town's heritage and maritime identity, and improves the overall visitor and community experience. Specifically:</i></p> <ul style="list-style-type: none"> ▪ <i>All new lighting, wiring and communications infrastructure shall be placed underground wherever feasible, to reduce over-head cabling, poles and visual intrusion.</i> ▪ <i>Lighting design shall be site-specific, using decorative standards in plazas and along quays, emphasising heritage frontages, town-centre gateways and riverside links.</i> ▪ <i>The public-realm works shall reflect Arklow's heritage (boat-building, pottery, seaside identity) and integrate craft/design elements, coordinated across streets, junctions and the waterfront to create a cohesive sense of place.</i> ▪ <i>Infrastructure renewal shall be planned and delivered as part of a comprehensive public-realm master-scheme rather than piecemeal, ensuring continuity of design, materials, branding and quality across the town-centre regeneration area"</i> <p>For the following reasons:</p> <ul style="list-style-type: none"> ▪ National policy recognises the public realm (streets, footpaths, open spaces) as central to how historic towns function and how users experience them. Improvements to lighting and infrastructure are cited as important to enhance evening use, way-finding, heritage accentuation and visitor safety. (failteireland.ie); ▪ The national "Town Centre First" policy emphasizes a "holistic, place-based approach" to town-centre regeneration, meaning that lighting, wires, poles, signage and street-furniture need to be part of overall placemaking, not just functional additions. (gov.ie); ▪ For Arklow, embedding this objective will ensure that regeneration of the town centre does not replicate generic public-realm infrastructure but instead celebrates the town's identity (maritime, craft, pottery, seaside). Underground wiring helps reduce visual clutter and contributes to a cleaner, higher-quality streetscape, which in turn benefits visitor appeal, heritage authenticity and local quality of life.

Chief Executive's Response

Public lighting

Street lighting is maintained centrally by the public lighting team through a third party contractor. The public is encouraged to report any issuing arising.

The suggestion made for a new objective is noted and is considered appropriate to include in the LPF. However it must be noted that at this time, the Council has no programme or funding source to carry out an overhaul (redesign, ducting etc) of the public lighting system in Arklow town centre, but this will stay under review and funding sought if a funding scheme is made available.

District Heating

The project suggested is currently being investigated by the Council's Climate Action Team. Such projects are already supported by the objectives of the Wicklow County Development Plan (County Policy Objective 16.34 refers).

Chief Executive's Recommendation

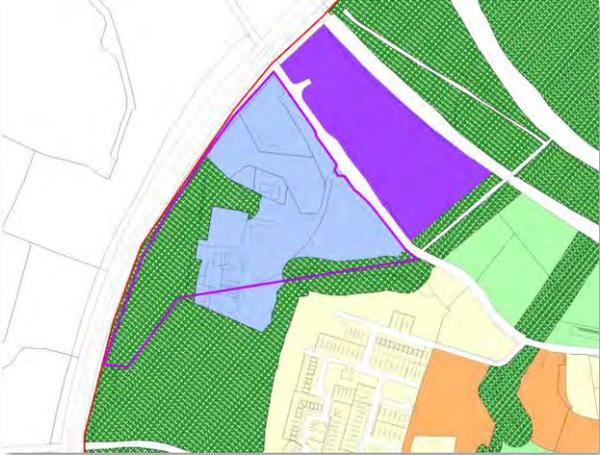
Add the following objective to the LPF:

- ARK-XX** Public-realm works in Arklow town centre (including lighting, street furniture, paving and signage) shall wherever feasible be carried out in a coordinated, locally distinctive manner which advances high-quality design, reduces visual clutter, reinforces the town's heritage, and improves the overall visitor and community experience, in particular:
- New lighting, wiring and communications infrastructure shall be placed underground wherever feasible, to reduce over-head cabling, poles and visual intrusion.
 - Lighting design shall wherever feasible be site-specific, using decorative standards in plazas and along quays, emphasising heritage frontages, town-centre gateways and riverside links.
 - The public-realm works shall wherever feasible reflect Arklow's heritage (boat-building, pottery, seaside identity) and integrate craft/design elements, coordinated across streets, junctions and the waterfront to create a cohesive sense of place.
 - Infrastructure renewal shall wherever feasible, be planned and delivered as part of a comprehensive public-realm master-scheme rather than piecemeal, ensuring continuity of design, materials, branding and quality across the town-centre regeneration area.

4.2.11 Submissions related to Draft LPF (Part B:9) – Zoning & Land Use

This section of the report is concerned with requests for changes to zoning. These are presented in numerical order, rather than by area / location. However, if more than one submission is made with respect to the same lands, these are grouped together.

B.9.0 ZONING REQUESTS

No.	Name	Issues Raised
2	Sunbeam House Services 155848	<p>It is requested that lands of c. 8.5ha at Ballyraine, Vale Rd are zoned to facilitate a mix of uses in connection with Sunbeam House Services including employment/enterprise facilities and a residential component for specialised housing.</p> <p>The submitters proposal includes:</p> <ol style="list-style-type: none"> (1) Specialised housing: the development of purpose-built housing designed to meet the needs of their client base. It is supported living that promotes independence, dignity and integration within the community. Addressing the critical shortage of appropriate housing options for vulnerable adults in Wicklow (2) Respite and Holiday Facility: a dedicated facility for people with disabilities, providing a vital short-term break for families and full-time carers while offering clients a welcoming and accessible venue for holidays and short-term stays (3) Facilities for care of the Elderly: Recognising the demographic trend of an aging population complementary facilities for the elderly are envisioned. This could range from sheltered housing to a day care centre, fostering intergenerational connections and providing a continuum of care within a single, supportive environment (4) Social and Enterprise Care Centre: create meaningful employment for clients and wider community, foster local enterprise and generate sustainable revenue <p>In support of this, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The development would create jobs ▪ Deliver specialised infrastructure ▪ Promote social inclusion 

Chief Executive's Response

The proposed zoning for the above-mentioned lands is Community and Education (CE) and OS2. This is very similar to the previous LAP, where the lands were zoned all CE.

The LPF provides typical appropriate uses for each zone type - CE is as follows:

Uses generally appropriate for **community and educational (CE)** zoned land include community, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, nursing homes, health related developments, sports and recreational facilities, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP and applicable Local Plan / Framework.

While the CE zoning does not explicitly provide for specialised or sheltered type housing or enterprise use, such uses where they would be **ancillary** to the 'CE' use is provided for in the CE description. Therefore it is considered that the CE zoning generally supports the type of uses detailed in the submission.

As stated in the LPF, the planning authority shall determine each proposal on its merits and shall only permit the development of uses that enhance, complement, are ancillary to, or neutral to the zoning objective. A change in the CE would potentially allow for residential / enterprise use that is not related to the community, educational or institution use of the lands, which would not be supported given the loss of services this might entail, and also the pressure that multiple users / uses could place on these lands, at the periphery of the settlement.

Therefore no change in zoning is recommended.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
3	<p data-bbox="245 237 424 300">Pauric Hyland By hand</p>	<p data-bbox="529 237 1439 338">The submitter requests a change of zoning in 3 No. locations within the town boundary at (1) Hazeldene, No.12 Ferrybank, (2) Killiniskyduff, (3) Templerainey (as shown on the maps to follow).</p> <p data-bbox="529 378 1439 479">Request 1: It is requested that the land zoned OS2, be zoned Town Centre (TC) or returned to Existing Residential (RE) zoning as per the 2014-2017 LAP. In support of this rezoning the following grounds are put forward:</p> <ul data-bbox="580 483 1439 656" style="list-style-type: none"> <li data-bbox="580 483 1158 517">▪ The property was zoned RE in a previous LAP <li data-bbox="580 521 1439 656">▪ The submitter intends to seek planning permission for a small development of one/two bed apartments in the area to the rear of the property to maximise the residential development of the site while maintaining significant areas of 'Open Space' and recreation. <p data-bbox="529 696 703 730">Change from:</p>  <p data-bbox="529 1279 671 1312">Change to:</p> 

Request 2: It is requested that the lands proposed to be zoned for OS2, retain the E zoning. In support of this rezoning request the following grounds are put forward:

- It is located in a most prominent position on the northern entry to the town and is ideally located to provide development under the employment zoning

Change from:



Change to:



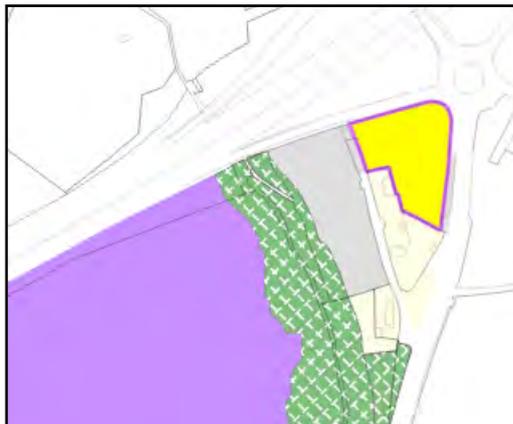
Request 3: It is requested that existing RE zoning is extended as close as possible to the northern boundary of the site. In support of this the following is put forward:

- To facilitate potential future residential development of the site in keeping with the proposed core strategy for development within the Environs

Change from:



Change to:



Chief Executive's Response

Request 1: As stated in the draft LPF, *'The Planning System and Flood Risk Management'* guidelines follow the principle that certain types of vulnerable development should not be permitted in flood risk areas, particularly flood prone areas, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development. As a result of the updated SFRA, changes in zoning were necessary compared to the previous plan and strengthened objectives for site specific flood risk assessments for lands at potential risk of flooding in the longer term (having regard to the OPW climate change scenarios flood projections) were required.

Residential development is considered a highly vulnerable development in the classification of vulnerability versus flood zones. Site A is located in Flood Zone A, therefore the suggestion to extend the TC zoning to include this land or revert to RE zoning would not be considered appropriate, unless the 'Justification Test' is satisfied.

In this case, the Justification Test is **not satisfied** because it fails to meet the following requirements:

- (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement
- (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement

While it is acknowledged that the Flood Relief Scheme represents a critical step towards safeguarding Arklow from the adverse effects of flooding, given the inherent possibility of flood defences overtopping or breaching, zoning is evaluated on the basis that such failure could occur. Flood zones are defined on a precautionary basis, therefore even with the presence of Flood defences, the underlying Flood Zone classification remains. A Flood Relief Scheme does not make Flood Zone A sites eligible for new residential development as the residual risk remains.

Therefore, the OS2 zoning as proposed in the draft LPF is considered fully justified in the interest of flood risk prevention (Please see Flood Risk maps accompanying this LPF having regard to Addendum 1 and any updates arising from same).

Request 2: In relation to the request for additional 'Employment' zoned lands, careful consideration has been given to the provision of Employment lands in the draft LPF. Having regard to the minimum areas set out in Section B.4.3 and the principles for the zoning of greenfield land for employment in Section B:4.4 of the draft LPF, it is not considered necessary to expand Employment land use zoning at this time, considering the quantum of undeveloped employment land provided for at this location. This site is also adjacent to a watercourse where a 25m protected riparian buffer is required, which would reduce the area of land that could be developed significantly.

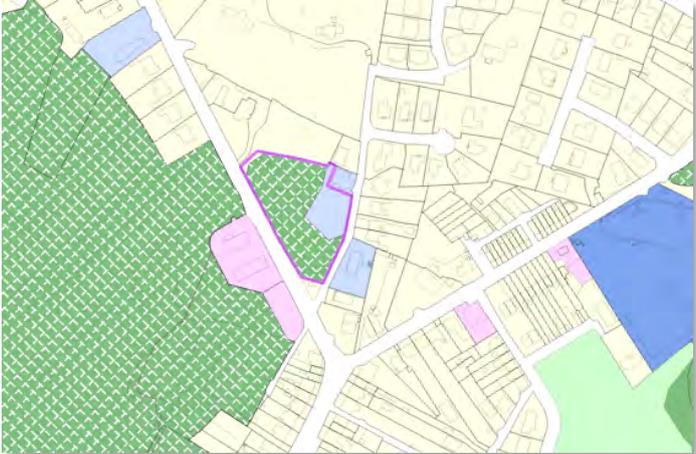
On this basis, it is not recommended to rezone the subject lands

Request 3: The lands in question (southwest of Junction 20 of the M11) have been reserved and designated for PU zoning as it is the objective of the Council as set out in the draft LPF for these lands to be developed as a Park and Ride Facility (ARK 79). It is a suitable location for this type of development given its proximity to the motorway, which consequently makes it an inappropriate location for residential development (given the County Development Plan requires a 100m set back of new residential development from the M/N11). Extant permission is in place for the Park and Ride Facility.

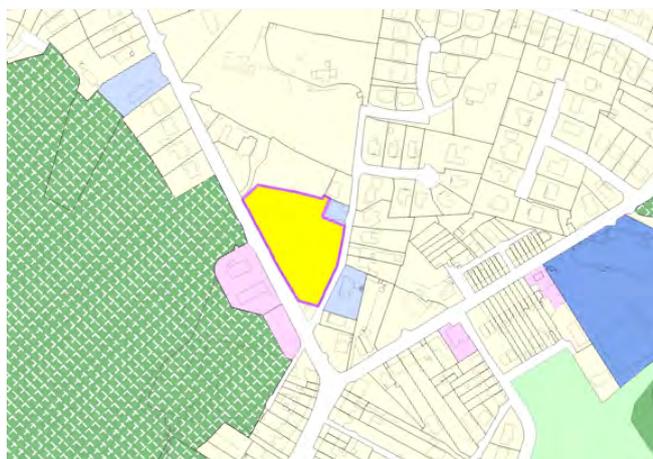
On this basis, it is not recommended to rezone the subject lands.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
4	Paul Maher, Michele Maher (nee Duggan), Paula Tom and Andrew Maher 175149	<p>This submission relates to lands at Briggs Lane (as shown on the maps to follow)</p> <p>It is requested that these lands be rezoned RE. In support of this rezoning the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ In 2001 Martin Hamm Consulting met council engineer Tom Moynihan who discussed and resolved any drainage issues at the site ▪ Since then, a culvert from the land into the marsh was blocked on the Circle K side of the road which resulted in water being held on the land. This culvert had been in place for decades and its recent unblocking now has resulted in the land drying out ▪ The planning, flood risk consultants, PH McCarthy Consulting Engineers, whose company was employed by the council at the time to prepare a flood study report visited the site and stated that from an engineering / flood risk viewpoint he had no issues ▪ The blocking of the culvert may have been a contributing factor in water remaining on Dublin Rd ▪ His children have expressed interest in building homes on the site ▪ With the development of the flood defences planned and wastewater treatment plant, the site is prime residential, within walking distance of the town centre, local schools and churches <p>Change from:</p> 

Change to:



Chief Executive's Response

As stated in the draft LPF, 'The Planning System and Flood Risk Management' guidelines follow the principle that certain types of vulnerable development should not be permitted in flood risk areas, particularly flood prone areas, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development. As a result of the updated SFRA, changes in zoning were necessary compared to the previous plan and strengthened objectives for site specific flood risk assessments for lands at potential risk of flooding in the longer term (having regard to the OPW climate change scenarios flood projections) were required.

The CE zoning at this location has been extended to reflect the use as it exists on the ground, while the RE zoning is not considered appropriate as these lands are identified as being in Flood Zone A and Flood Zone B due to the highly vulnerable risk of residential use. The OS2 zoning was proposed in the draft LPF due to Flood Risk along the R772 boundary of the site.

This area experienced recent flooding during Storm Chandra.

Residential development is considered a highly vulnerable development in the classification of vulnerability versus flood zones, therefore R zoning would not be considered appropriate in Flood Zone A or B, unless the 'Justification Test' is satisfied.

In this case, the Justification Test is not satisfied because it fails to meet the following requirements:

- (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;
- (ii) Comprises significant previously developed and/or under-utilised lands
- (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement

While it is acknowledged that the Flood Relief Scheme represents a critical step towards safeguarding Arklow from the adverse effects of flooding, given the inherent possibility of flood defences overtopping or breaching, zoning is evaluated on the basis that such failure could occur. Flood zones are defined on a precautionary basis, therefore even with the presence of Flood defences, the underlying Flood Zone classification remains. A Flood Relief Scheme does not make Flood Zone A sites eligible for new residential development as the residual risk remains.

Therefore, the OS2 zoning as proposed in the draft LPF is considered fully justified in the interest of flood risk.

It should be noted that the previous residential zonings of these lands were not taken up at any time despite applications for residential development being submitted.

Please see Flood Risk maps accompanying this LPF (having regard to Addendum 1 and any updates arising from same).

On this basis, it is not recommended to rezone the subject lands as requested.

Chief Executive's Recommendation

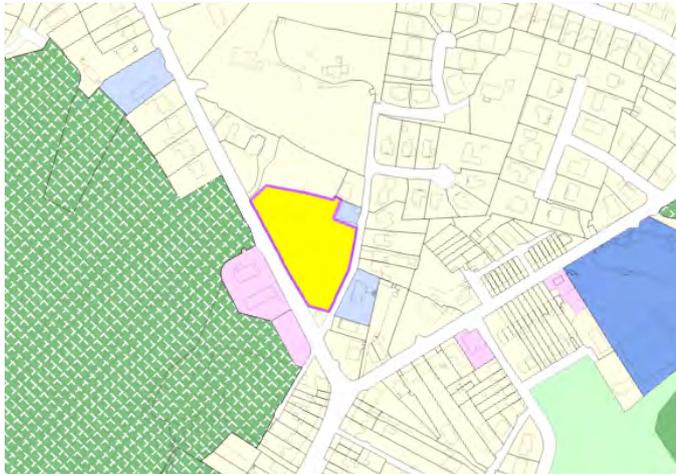
No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
48	Paul Maher 132433	<p>This submission relates to lands at Briggs Lane as shown on the map to follow. (The site of Rehab group does not form part of the subject lands to which this submission relates)</p> <p>It is requested that these lands proposed to be zoned OS2 and CE be rezoned to RN(1).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>In support of this request the following grounds are made:</p> <ul style="list-style-type: none"> ▪ The subject lands are an edge of centre infill site located c. 9 minutes from Main Street and aligns with the settlement strategy of consolidated zoning ▪ The majority of the subject lands lie outside of Flood Zone A and the lands are suitable for residential development ▪ The site is located less than 200m from the zoned Town Centre of Arklow and c.900m from Main Street ▪ The subject lands are well served by services and community and social infrastructure ▪ The subject site is suburban and surrounding lands have been subject to considerable residential development since the 1990s ▪ Rezoning the land supports the achievement of National Policy Objectives for the consolidation of existing built up areas ▪ There is concern whether zoning these lands OS2 is sustainable in the longer term. An isolated pocket of scrub growth surrounded by development could quickly become waste land on an otherwise suburban road ▪ The section of the R772 along the western boundary of the subject lands is one of the principal approaches to the town. ▪ The site is located within the established development envelope of Arklow, positioned between existing residential developments in what is demonstrably a suburban context ▪ A detailed Site Specific Flood Risk Assessment and Justification Test has been undertaken and concludes the following: <ul style="list-style-type: none"> - The site layout has been carefully designed to position buildings on higher northern and central portions of the plot and raising the FFL levels above the surrounding site level, effectively placing the dwellings within Flood Zone C - The principal flood risk arises from fluvial flooding associated with the Avoca River and Marsh. Coastal Flooding is not a constraint - Development within Flood Zones A and B will be minimal and limited to landscaping and surface-water management works - No reliance is placed on external flood defences

Change from:



Change to:



Chief Executive's Response

These are the same lands, with the same request, as set out in Submission No. 4 above. Please see the assessment and response under Submission No. 4.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
16	Arklow United FC 063341	<p>This submission relates to a site between the Wexford Road and Arklow bypass. It is requested that a section of the employment zoning be changed to 'recreational' so that it may be possible to construct a pitch on site.</p> <p>In support of this the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The club's current facilities are not sufficient to provide a sporting outlet for the next generation of young people in Arklow ▪ the town needs to have the foresight to develop sports facilities for our young people considering the projected housing developments in the area ▪ This site owned by the council has been identified which if rezoned could possibly become a sports hub for the community or at the very least, be used as a second pitch for Arklow United FC ▪ The club are open to any alternative suggestions with regard to a new playing pitch <p>Change from:</p>  <p>Change to:</p>  <p>[Note: It is not explicitly stated in the submission what rezoning is requested, however it is reasonably clear from the content of the submission that an AOS 'Active Open Space' zoning is requested for the lands.]</p>

Chief Executive's Response

These lands were acquired by WCC for the purpose of supporting economic activity and employment generation in the south Arklow area, and therefore the 'E' zoning is considered appropriate to maintain. These are essential zonings that are necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles.

The accompanying Arklow Social Infrastructure Audit sets out the rationale for the quantum of AOS lands within the draft LPF. In accordance with the analysis set out in same, the LPF already makes considerable provision for new AOS lands, close to the centres of population of the settlement and identified area of new housing growth.

With regard to the development of Active Open Space (AOS) where existing clubs need enhanced or expanded facilities, it should be noted that the provision / development of sports and/or facilities by the Local Authority is outside the remit of the LPF. It is the role of this land use framework to ensure adequate and suitably located lands are zoned for the uses needed to sustain the existing and future population, but the delivery/purchase/development of such new sports grounds would be an implementation and funding matter outside the remit of the LPF objectives.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
17	Lloyd Hotel Group 093233	<p>This submission relates to the lands at Kynoch Lodge, Sea Road (as shown on the maps to follow). It is requested that these lands be rezoned from Residential (RE) and Natural Areas (OS2) to Tourism (T).</p> <p>The following points are raised in support of this rezoning request:</p> <ul style="list-style-type: none"> ▪ Kynock Lodge shares its boundary with the Arklow Bay Hotel. Both properties are under the same ownership, who are intending to integrate the two sites into a single, high-quality tourism and hospitality destination. ▪ The adjoining hotel lands are zoned for 'Tourism' and the proposed rezoning would create a coherent and complementary land use pattern that supports the expansion and enhancement of Arklow's tourism offering. ▪ The site's location and context make it ideally suited to accommodate tourism related development, which would contribute positively to the local economy, promote sustainable growth and strengthen Arklow's position as a key coastal destination. ▪ The tourism zoning would facilitate the refurbishment and sensitive adaptation of Kynoch Lodge as a destination wedding and event venue complemented by accommodation and dining facilities at the Arklow Bay Hotel. <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The CE is amenable to revising the majority of the 'RE – Existing Residential' zoning at this location to 'T – Tourism' in order to facilitate the redevelopment of the site as a wedding and events venue to complement the offering of the adjacent Arklow Bay Hotel. Given that the eastern boundary of the lands is identified as at risk of flooding, it is recommended that this area changes from RE to OS rather than T, as it is not evident that T zoning would satisfy the Justification Test.

The OS2 zoning must be retained on the western side of subject site as there are Corsican Pines at the road boundary with a designated tree protection order (TPO_50) as set out in *Chapter 17 - Natural Heritage and Biodiversity* of the County Development Plan 2022-2028. Therefore, it is not considered appropriate to rezone the OS2 lands.

With respect to the removal of Kynoch Lodge from the Record of Protected Structures, this is a separate process set out in current legislation. There will an opportunity to address this in the forthcoming review of the County Development Plan. Please also see Section B.7 Heritage, Biodiversity & Green Infrastructure of this report.

Alter Land Use Zoning Map as follows:

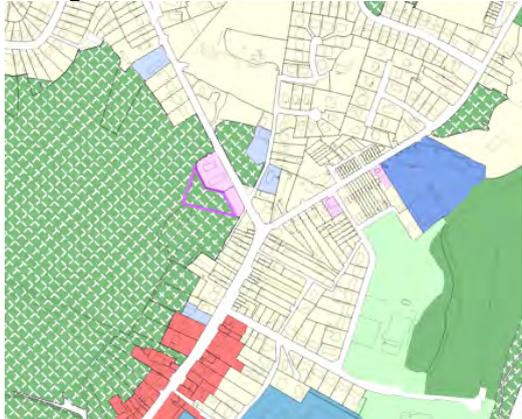
Change c. 0.96ha of 'RE – Existing Residential' to c. 0.83ha 'T – Tourism' and c. 0.13ha 'OS1 – Open Space'

Change from:



Change to:



No.	Name	Issues Raised
20	Paschal Bermingham 150807	<p>This submission relates to lands located to the rear of Circle K at the southern end of the Dublin Road (as shown on the map to follow).</p> <p>It is requested that a portion of these lands retain the 'Local Shops and Services' (LSS) zoning.</p> <p>In support of this request, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The site is served by the old Dublin Rd (N11) to the front with secondary access along its southern boundary ▪ There is established access without creating another exit onto the public road ▪ The site is fully serviced with mains power, water and sewage ▪ The marsh report excludes the southern portion of the site from the marsh pNHA area and the buffer zone ▪ The submitter has carried out an assessment of the site for development ▪ The submission includes a Flood Risk Assessment (Appendix A) for the subject site which satisfies the Justification Test with regard to a proposed Medical Practice Building <p>This submission also suggests that the Circle K have expressed an interest in developing their site to the rear and southwards.</p> <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

As set out in the Green Infrastructure Audit appended to the draft LPF, "In relation to backlands to the rear of properties west of the R772 at Ferrybank, zoned RE 'Existing Residential' and LSS 'Local Shops and Services', flood risk is apparent throughout the area. It is considered appropriate that the precedent established in the last plan of OS2 zoning to backlands just south of this area be extended, providing an extended buffer to the east of the Marsh".

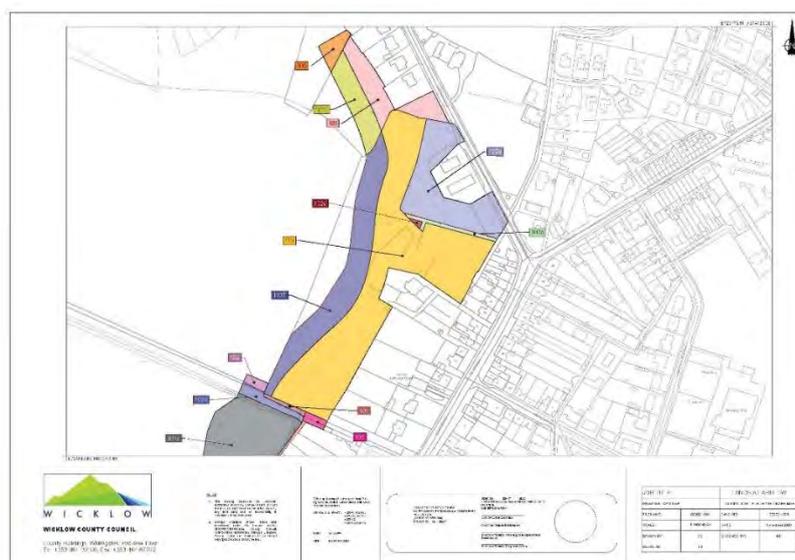
As stated in the draft LPF, 'The Planning System and Flood Risk Management' guidelines follow the principle that certain types of vulnerable development should not be permitted in flood risk areas, particularly flood prone area, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development. As a result of the updated SFRA, changes in zoning were necessary compared to the previous plan and strengthened objectives for site specific flood risk assessments for lands at potential risk of flooding in the longer term (having regard to the OPW climate change scenarios flood projections) were required.

In accordance with Flood Guidelines, the type of uses suggested (commercial use, petrol station / shop expansion, medical centre) are in some cases deemed 'highly vulnerable' uses (in the case of medical facilities, petrol station) whereas other commercial / retail use would be considered 'less vulnerable'. Taking the best-case scenario where only 'less vulnerable uses' are proposed, given that the lands are located in an area identified as Flood Zone A, zoning for such use can only be considered where the plan making 'Justification Test' is passed.

These lands have been addressed in the accompanying SFRA appendix where they are shown to fail the 'Justification Test' for failure to meet the following requirements:

- (i) is essential to facilitate regeneration and/or expansion of the centre of the urban settlement, and
- (iv) will be essential in achieving compact and sustainable urban growth

It should be noted that Wicklow County Council has already purchased the subject site as part of the development of the Arklow Flood Relief Scheme, therefore, there is no apparent grounds for the rezoning of these lands for LSS or for the request. For clarification, the valuation of the subject lands has been undertaken with reference to the relevant Notice to Treat date and subsequent zoning changes do not affect this.



CPO Drawing

Please also see Flood Risk maps accompanying this LPF (having regard to Addendum 1 and any updates arising from same).

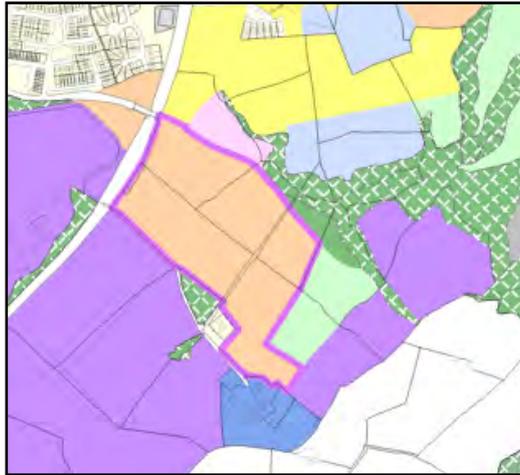
On this basis, it is not recommended to rezone the subject lands as requested.

Chief Executive's Recommendation

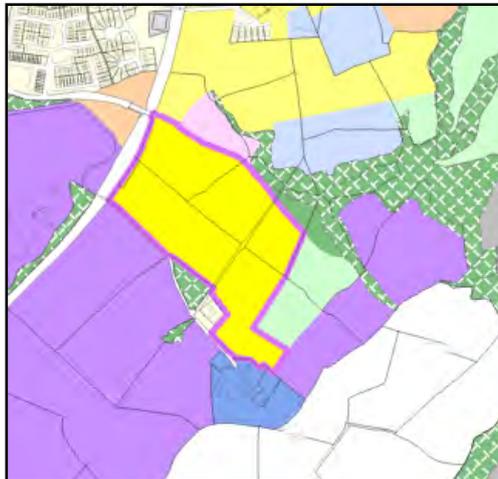
No change to the Draft Arklow LPF.

No.	Name	Issues Raised
32	Tom & Pat Redmond 164216	<p>This submission relates to lands identified in the draft LPF as SLO4 located at Tinahask Upper, Money Little and Money Big (see map to follow). This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>The following is requested:</p> <p>Request 1: It is requested that the c. 15.5 ha of lands zoned 'RN2 – New Residential Priority 2' be zoned 'RN1 – New Residential Priority 1'</p> <p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ These lands represent the only logical and technically feasible location to deliver the SPAR corridor, which is recognised as critical enabling infrastructure for Arklow's long term development and unlocking southward expansion of the town ▪ To enable the achievement of Arklow's housing delivery targets ▪ The subject lands are fully serviced with capacity for immediate connection to water, wastewater, and electricity infrastructure ▪ The requirement to exhaust Priority 1 lands before Priority 2 will significantly hinder the timely delivery of housing, as certain Priority 1 sites might face development constraints, such as ownership complexities, infrastructure requirements, or other site-specific challenges ▪ Rezoning these lands will ensure continuity between existing and future phases, prevent piecemeal development and maintain consistency with the agreed AAP2 phasing principles and approved planning conditions ▪ It is critical to the creation of a balanced and sustainable community supported by active open space, educational and local retail facilities in accordance with proper planning and sustainable development principles ▪ It appears that no Settlement Capacity Audit has been undertaken, which is a critical flaw in the zoning process. Without such an audit, there is no objective basis to justify why certain sites are zoned Priority 1 while others are relegated to Priority 2. <p>Request 2: Attach key phasing conditions that directly reflect existing the phasing requirements established under both the approved AAP2 and the conditions attached to the permitted LRD scheme</p> <p>While it is noted that majority of the draft LPF 'SLO4' provisions are consistent with the framework previously agreed through the Action Area Plan (AAP2), to ensure consistency, certainty and alignment with the approved delivery programme it is requested that the LPF adopt a wording approach for SLO4 that:</p> <ul style="list-style-type: none"> ▪ confirms the primacy of the approved AAP2 phasing strategy and LRD conditions ▪ provides flexibility to ensure that development proceeds in accordance with agreed and permission-based triggers where already established.

Change from:



Change to;



Chief Executive's Response

Request 1:

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through **Variation No. 6**. This Variation No. 5 does not propose wider changes to the CDP other than those needed to establish the new land use framework for Arklow. The publication of the *"NPF Implementation: Housing Growth Requirements"* in July 2025, which included new housing targets for Wicklow, has necessitated a review of the CDP beyond the remit of Variation 5 itself. WCC's implementation of these requirements, and how it affects the Arklow LPF is outlined below:

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, Proposed Variation 6 also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1: All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive’s Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE’s Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From Section 3.0: Introduction

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From Section 3.4: Zoning

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (as is proposed in Proposed Variation No. 6).

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

In response to **Request 2** the CE is satisfied that the provisions and phasing set out in SLO4 consider the design and phasing of the approved masterplan. The minor alterations are to ensure that development proceeds in an orderly and sequential manner consistent with the principles of the CDP, and road infrastructure, local shops and services, and active open space are delivered in tandem with residential development. Note, in the draft LPF in relation to SLO4, it is stated '*where there is any divergence with the new requirements set out, these shall be implemented either through the updating of the masterplan or through the development management process*'.

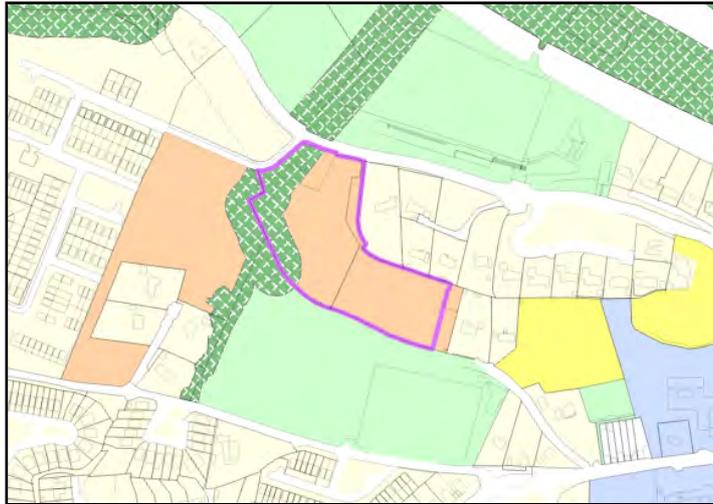
On foot of this, no change is recommended.

Chief Executive's Recommendation

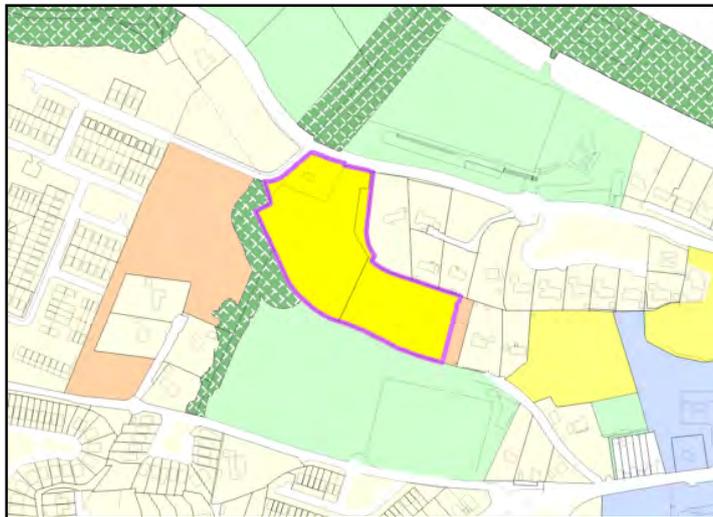
No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
33	P & B Bermingham 201930	<p>This submission relates to lands of c. 1.9 ha located at Vale Rd, Yardland Td.</p> <p>Request 1: It is requested that these lands zoned RN(2) in the draft LPF be zoned RN(1).</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ This site is currently zoned 'R28 New Residential' under the current 2018-2024 LAP, with direct road access and mains services connection ▪ There has been limited residential development over the past 15 years due to the WWTP and restricting development on this fully serviced site directly conflicts with current housing needs at a local and national level ▪ Development achievable within the lifetime of the plan ▪ The site is well connected by neighbourhood facilities, local bus and train links located within a 10-15-minute walking distance ▪ Previous planning permission for residential development has been granted on the site ▪ In previous LAPs the subject site has always been zoned residential with no restrictions in place ▪ Invokes NPF provisions of compact growth, zoning of serviced land, housing growth requirements ▪ The housing figures in the CDP are based of 2016 Census figures and should be projected upwards in line with the NPF ▪ Zoning principles in the CDP include compact growth, delivery of population and housing targets, higher densities and a sequential approach ▪ The majority of lands zoned RN(1) are confined to two large un-serviced sites that require extensive infrastructure works to provide roads, water and foul services <p>Request 2: It is requested that the lands zoned OS2 in the draft LPF be zoned RN(1).</p> <ul style="list-style-type: none"> ▪ There is no watercourse at this location but located up further to the north ▪ The portion of the site zoned OS2 is based on a desktop study that is incorrect and this rezoning has a detrimental impact on the proper planning and sustainable development of the site. ▪ It is overgrown as it has been vacant for 20 years. The mature boundary trees are to remain but there is no ecological corridor as indicated by the desktop study. ▪ This rezoning would eliminate an agreed access and force the site to open another entrance which will impact traffic safety ▪ It will reduce the land available for development at a time government policy is to increase density on zoned serviced land

Change from:



Change to:



Chief Executive's Response

Request 1:

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through **Variation No. 6**. This Variation No. 5 does not propose wider changes to the CDP other than those needed to establish the new land use framework for Arklow. The publication of the *"NPF Implementation: Housing Growth Requirements"* in July 2025, which included new housing targets for Wicklow, has necessitated a review of the CDP beyond the remit of Variation 5 itself. WCC's implementation of these requirements, and how it affects the Arklow LPF is outlined below:

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, Proposed Variation 6 also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1: All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive’s Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE’s Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From Section 3.0: Introduction

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From Section 3.4: Zoning

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and*
- (b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due*

to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (as is proposed in Proposed Variation No. 6).

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

Request 2:

A study from AECOM undertaken as part of a planning application on the subject site identified 'an existing 225mm diameter surface water sewer'. Notably, one of the refusal reasons on the most recent planning application submitted on this site was with regard to the changes in levels within the site, the existing drainage channel boundary within the western/southwestern boundary and associated trees/hedging along that boundary, specifically *"it is considered that the proposed development would impact detrimentally on the existing drainage channel and on vegetation at this point"*. The proposed development would be contrary *"to the objectives of the CDP 2022-2028 which seek to provide a suitable buffer to existing watercourses and which seek to protect trees, hedgerows watercourses and other features of the natural landscape"*.

While it is recognised that this open water course adjacent to the site's northwest boundary is partly culverted, the application of a 25m buffer is still required as the stream channel and its associated characteristics and biodiversity still remains in places.

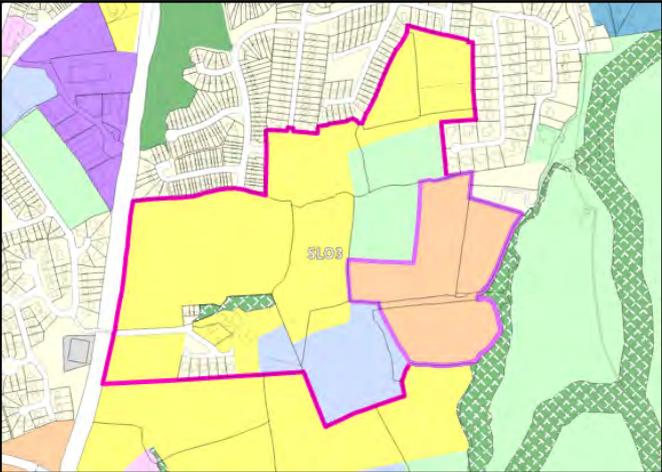
Beyond the watercourse there is a boundary of mature trees and irrespective of its origin the wooded area serves as an ecological corridor that connects the local network of green spaces. Rezoning from OS2 to RE where an open watercourse and mature tree line along an historic townland boundary is in situ, is not considered appropriate.

In regard to the agreed site access, as set out in the draft LPF *"Essential infrastructure, including roads / footpaths / cycleways and utilities that are necessary to support development lands, are generally permissible in all zones. Where such infrastructure would be required in OS1 or OS2 zones, and no other routes are viable, such infrastructure shall only be considered where it is shown it will not undermine the purpose of this zoning or give rise to significant adverse environmental impacts"*, and therefore the OS2 zoning would not preclude an access point if that were deemed that most suitable location for one.

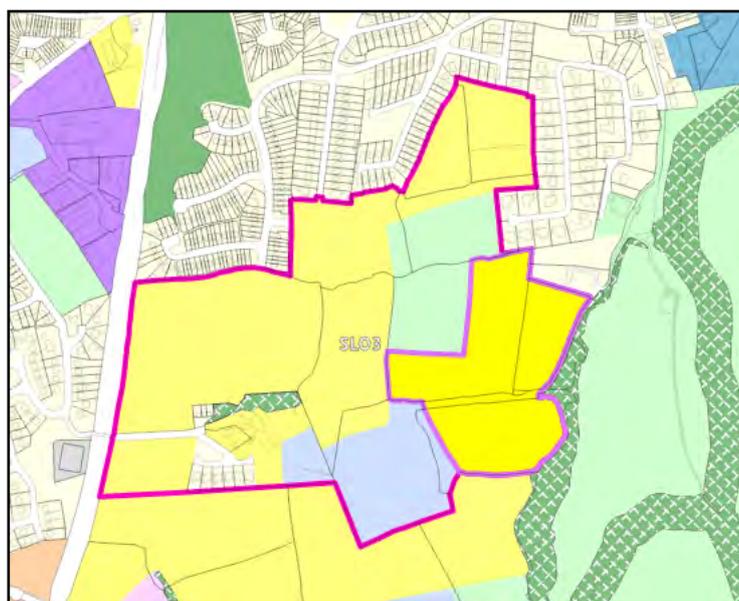
On this basis, no changes are recommended.

Chief Executive's Recommendation

No change to the Draft Arklow LPF.

No.	Name	Issues Raised
35	Shane Bermingham 202659	<p>This submission relates to lands of c.8.58ha located to the east of SLO3 lands at Tinahask Upper (see map to follow).</p> <p>It is requested that these RN(2) lands contained within SLO3 are rezoned RN(1).</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ In previous LAPs, all landowners and their land were treated equally and fairly ▪ It makes no sense to freeze development on the site at a time when more housing is required ▪ In 2024, WCC Housing Department made a submission to the Planning Department on behalf of the four landowners for a masterplan for the overall zoning of the site. In relation to residential zoning, it stated 'to make it fair and equitable for all landowners within AAP1 lands, it was agreed to a portion pro rata RE lands to each landowner ▪ It is the responsibility of the Planning Authority to ensure a proactive and flexible approach is taken to all new residential zoned lands to ensure housing targets are not delayed and so all residential land should be zoned RN(1) ▪ As a result of the NPF Housing Growth Requirements, the figures and targets based on 2016 Census figures should be projected upwards ▪ The draft LPF should be increasing housing availability by eliminating the RN(2) criteria to ensure there is suitable land available for development now ▪ It is likely that the subject lands will be developed before phase 3 of the Local Authority lands within SLO3, as access is agreed through the recently granted lands in SLO4 ▪ The proposed RN(2) zoning will sterilise the site from development for several years and goes against the fair and equitable proposal put forward by the Council in December 2024 where all lands would be RN(1) <p>Change from:</p> 

Change to:



Chief Executive's Response

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through **Variation No. 6**. This Variation No. 5 does not propose wider changes to the CDP other than those needed to establish the new land use framework for Arklow. The publication of the "NPF Implementation: Housing Growth Requirements" in July 2025, which included new housing targets for Wicklow, has necessitated a review of the CDP beyond the remit of Variation 5 itself. WCC's implementation of these requirements, and how it affects the Arklow LPF is outlined below:

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, Proposed Variation 6 also proposes to introduce new Core Strategy Objectives including:

"Core Strategy Objective 1: All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan."

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory 'Call for Sites' consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive's Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE's Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From *Section 3.0: Introduction*

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From *Section 3.4: Zoning*

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

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Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

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If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

Chief Executive's Recommendation

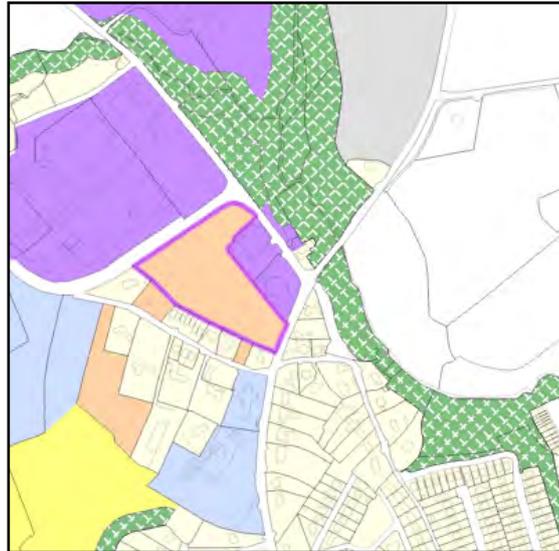
No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
38	Drom Mor Construction Ltd 092941	<p>This submission relates to lands of c. 2.08 ha at Beech Road, Kilbride (see map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>This request sets out the following requests:</p> <p>Request 1: Update core strategy to align with the NPF revised population and housing targets</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The increased national housing delivery target significantly increases the annual house requirements and negates the need for differentiating between tier one and tier two ▪ The revised housing targets result in an increased demand of 47% of units than the annual housing requirement adopted in the CDP 2022-2028 ▪ Adopting the draft LPF in advance of revising the CDP risks misalignment of the plan with National Policy ▪ While the inclusion of flexibility is acknowledged, the basis upon which residential land zoning is currently quantified remains linked to the outdated core strategy and does not reflect the additional provision required to address the urgent need for housing ▪ The approach that 75% of all RN(1) lands must be activated before RN(2) lands can be developed appears contrary to national policy and does not have regard to actual or likely land activation and housing completion rates <p>Request 2: Designate the subject lands as RN(1)</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The lands were previously zoned R28 under the 2018 LAP ▪ The subject site constitutes a logical infill opportunity that would support consolidation of the towns built up footprint ▪ The land represents a clear opportunity to promote a sequential approach to development and are ideally positioned to contribute to the delivery of sustainable residential in the short term ▪ The lands are located within a walking and cycling distance of the town centre and public bus corridors ▪ The lands are located in the Kilbride neighbourhood centre which includes community infrastructure and employment nodes ▪ The lands are serviceable by existing infrastructure ▪ This site benefits from both road and footpath access and is serviceable by water and sewer networks ▪ SUDs will be incorporated into the site design to manage surface water runoff in accordance with best practice and the requirements of the local authority ▪ Many of the existing permissions on RN1 lands were only granted in 2024 and 2025 and will not expire until 2029 or 2030. This creates a risk of

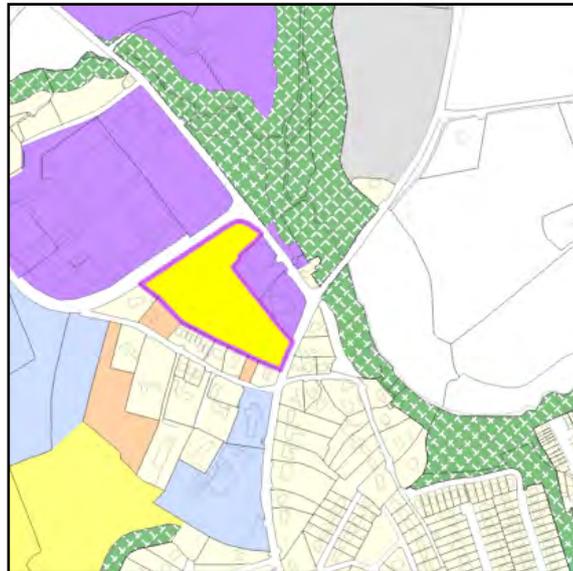
prolonged inactivity, during which RN2 lands would remain sterilised and unavailable for development due to the lack of active construction on permitted RN1 sites

- There is a clear inconsistency between the stated intent of ARK 17 and the LPF's zoning priorities. The subject infill site has been designated as Priority 2, while more peripheral and greenfield lands have been identified as Priority 1 despite their lack of infrastructure
- The landowner proposes full commitment to delivering a high-quality residential development on the subject lands

Change from:



Change to:



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guidance set out in 'Development Plans – Guidance for Planning Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

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Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

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(b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (as is proposed in Proposed Variation No. 6).

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

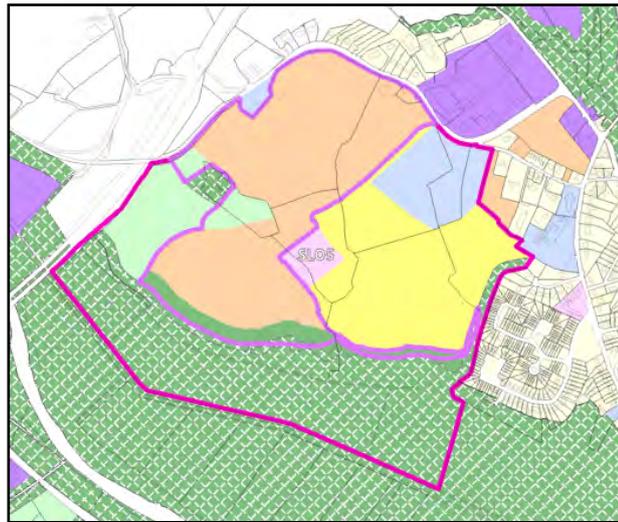
Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

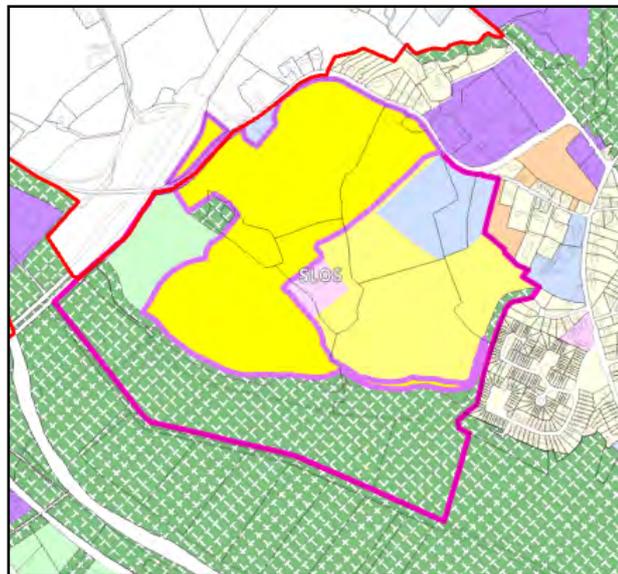
No.	Name	Issues Raised
45	Lowick Homes 120525	<p>This submission relates to lands identified in the draft LPF as SLO5 located at Kilbride (see map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>The following requests are made:</p> <p>Request 1: Retain all developable areas as set out in AAP3</p> <ul style="list-style-type: none"> ▪ All RN(2) lands in SLO5 be zoned RN(1) ▪ LSS zoning remain at 1ha ▪ Retain 200 units within each housing estate as set out in AAP3 <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The Masterplan and AAP were prepared to facilitate a SHD which was subsequently on hold pending the grant of permission for the WWTP which is now complete and operational ▪ The amount of residential development land has been reduced from by nearly c.16% from c.46.61ha to c.39.23ha ▪ The increase in AOS 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 ▪ The LSS zoning has increased to 1.4ha from 1ha. The quantum of c.1ha in the previous AAP is sufficient to provide local community services to serve the entire site of c.1500 units without competing with the Town Centre or Bridgewater ▪ The width of the buffer 'linear park' is excessive and restricts homes in the short term. Suggest clarity of the buffer strip is defined by text not indicated on the zoning map as it appears to vary in width and is inconsistent on the mapping ▪ The replacement of the agreed masterplan with the new Concept Plan, which does not have the benefit of the site investigations, detailed assessments and consideration of levels, is inappropriate ▪ 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 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 <p>Request 2: Revise Housing Targets to reflect the NPF first revision</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Housing targets in the Core Strategy do not reflect the revised NPF and need to be increased <ul style="list-style-type: none"> ▪ It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core

		<p>Strategy targets at the time of the decision to grant permission being significantly breached</p> <p>Request 3: Rephrase wording of proposed phasing objective B.9.2 so its site specific OR remove entirely <i>Permission will only be considered during the lifetime of this LPF for RN2 lands where the following conditions are satisfied:</i> - 75% of Priority 1 new residential lands (RN1) lands <i>within the designated SLO Lands (SLO1, SLO2, SLO3, SLO4 and SLO5) have been activated (i.e. consent obtained and development initiated)</i></p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Of the c. 39ha available only c.15.96ha can be delivered in the immediate future as policy B.9.2 means RN2 can only be delivered once all RN1 lands have been activated ▪ 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 ▪ There has been a lack of delivery of granted permissions, nor has there been, LRD aside, any significant increase in permissions for large residential developments. This site is ideally positioned to deliver housing with a developer who is ready to commence on site <p>Request 4: Omit 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’</p> <ul style="list-style-type: none"> ▪ 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 <p>Request 5: Include the 0.72 ha land plot to the northwest of the site</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The inclusion of the additional 0.72 ha plot would not only enable the comprehensive development of the site but would also provide for additional residential development in this area
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Change from:



Change to:



Chief Executive's Response

Request 1: The AAP3 designation from the previous LAP provided for an overall 'Mixed-Use' zoning, and this did not equate to the majority of the zoning being allocated for residential use. It was the case that significant areas of this MU zoning were to be reserved for open space / parks / sport, a buffer zones along the Marsh, community use and retail / retail services.

The provision of additional 'AOS' zoning in this area is necessitated by the increased projected population associated with proposed residential development in areas of new housing growth. These are essential zonings that are necessary to facilitate supporting infrastructure and sustainable development of the LPF area in order to meet Wicklow County Development Plan requirements and sustainable development principles.

The condition and ecological value of the lands in SLO5, particularly the lands identified as OS2 have been carefully surveyed and evaluated as part of the LPF crafting process.

Where development is taking place rapidly in what was a peri-urban agricultural landscape, the relative ecological and amenity value of retained green areas is high. Not only are they important in the context green infrastructure but they can also contribute to flood management and enable future restoration in line with the EU Nature Restoration Law, National Biodiversity Action Plan, and County Wicklow Development Plan policies. This aligns with the precautionary principle and national planning objectives promoting resilient, nature-positive development.

As urbanisation progresses, remaining semi-natural land parcels gain disproportionate value as stepping stones, buffers, and green infrastructure for biodiversity (National Biodiversity Action Plan 2023–2030). Even degraded areas (e.g., invasive species present) can serve as important reservoirs for future restoration and contribute to habitat connectivity under Article 10 of the Habitats Directive.

Potential wetlands provide key ecosystem services, including:

- Flood attenuation
- Water filtration and carbon storage
- Space for future nature-based solutions
- Habitat for wetland species and pollinators

These co-benefits are central to the National Restoration Plan (due under the EU Nature Restoration Law) and 202 support targets under the Water Framework Directive and Climate Action Plan 2024.

The OS2 zone as proposed in the draft LPF is therefore considered fully justified in the interest of protection and maintenance of habitats and biodiversity. However, the SLO objectives do contain a provision that if following ecological assessment, some parts of the OS2 are found to be suitable for human use without damage to natural habitats, then such area may be laid out with sensitively designed and located paths, play spaces etc.

Retaining existing proposals provides a better level of environmental protection (i.e. the Arklow Town marsh pNHA) and would better support alignment with and the achievement of the following Strategic Environmental Objectives defined for the CDP:

- To preserve, protect, maintain and, where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species
- Safeguard national, regional and local designated sites and supporting features which function as stepping stones for migration, dispersal and genetic exchange of wild species.
- Enhance biodiversity in line with the National Biodiversity Action Plan and its targets.
- To protect, maintain and conserve the County's natural capital

With respect to housing estate size, the County Development Plan provides that: *'The maximum size of any greenfield housing development will depend on the size of the town and the requirements of the town plan / local area plan, but shall not be greater than 100 units where only traditional houses are proposed or 200 units where there is a mix of houses and apartments. Any development exceeding this number shall be broken up into a number of distinct 'estates', even if accessed from a shared road, with materially different architectural styles.'*

With respect to SLO 3 Abbeylands and Tinahask Upper Objective *'To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct residential areas (not exceeding 150 units) each containing materially different house designs and typologies within an overall unified theme'* the change from 200 units to 150 units is a typographical error. To ensure consistency with the CDP the CE recommends amending the text to retain 200 units.

Request 2:

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through **Variation No. 6**. This Variation No. 5 does not propose wider changes to the CDP

other than those needed to establish the new land use framework for Arklow. The publication of the “*NPF Implementation: Housing Growth Requirements*” in July 2025, which included new housing targets for Wicklow, has necessitated a review of the CDP beyond the remit of Variation 5 itself. WCC’s implementation of these requirements, and how it affects the Arklow LPF is outlined below:

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, Proposed Variation 6 also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1: All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive’s Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE’s Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From **Section 3.0: Introduction**

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From **Section 3.4: Zoning**

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in 'Development Plans – Guidance for Planning Authorities' (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

(a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and

(b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (as is proposed in Proposed Variation No. 6).

If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

Request 3: Rewording of the proposed objective is no longer considered necessary to facilitate development as following the adoption of Variation No.6, all RN(2) lands will be unlocked for immediate development.

Request 4: Noted, its recommended that this be omitted from the LPF.

Request 5: The request for the inclusion of additional lands to SLO4 would comprise extension and sprawl of the settlement into the unzoned countryside surrounding the settlement, contrary to the principles of compact growth, sustainable movement and environmental protection. These lands are disjointed from the remainder of SLO4 and in addition, these lands are located within 100m of the M/N11, an area within which the County Development Plan **precludes** residential development.

On this basis it is not recommended to extend the settlement boundary.

Chief Executive's Recommendation

Alter SLO 5 objective

SLO 5 Kilbride objectives

- An area of 5ha zoned CE: Community & Education shall be reserved to facilitate the planned development of a new school campus (primary and post primary). ~~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 a school's campus.~~

and

- To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct residential areas (not exceeding ~~150~~ 200 units) each containing materially different house designs and typologies within an overall unified theme.

No.	Name	Issues Raised
46	Patrice & David Torbet 133843	These submissions both relate to lands of c.0.18ha located at Ferrybank (see map to follow).
47	Elizabeth Cannon 134302	<p>It is requested that the subject lands be rezoned from OS2 to Town Centre (TC).</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The proposed zonings bear no relevance to the historical or existing use of the site ▪ Impedes development to their home's contrary to proper planning and sustainable development ▪ The OS2 zoning splitting down the middle leaves no land left over to extend their homes, sterilising the gardens and having a detrimental impact on the value of their homes ▪ The rezoning of the subject lands in 2018 was done without the knowledge of the landowners ▪ It is highly unusual for a strip of land to be omitted and zoned OS2 along a section of development land ▪ The location of the subject lands in a built-up suburban area forming a residential site should never have been split and zoned open space in the previous development plan ▪ With the Flood Relief Scheme design now finalised and alternative marsh access introduced, all the subject lands should be rezoned ▪ It is noted that the 2 access lanes to the Marsh further north at Ferrybank and Briggs Lane are zoned RE. The landowner's land is private property with no public access permitted while both these lanes are public serving several residential properties so if any lanes should be zoned open space, it should be these public access lanes ▪ The public car park is also zoned 'OS2' which is at odds with the zoning principle ▪ The Flood Relief Scheme has been approved and the proposed 3-metre-high embankment is located behind the subject lands to the west and provides both flood protection to the lands and a buffer zone (eliminates any flood concern) ▪ The NPF promotes flexible zoning and prioritises new housing within existing serviced settlements to support sustainable, compact growth. Based on these objectives, the subject lands should be zoned Town Centre (TC) ▪ While the landowner has no intention or desire to develop this land, the national and local policies put forward show that the land should not be zoned OS2 ▪ The site analysis in the GIA has been prepared on a desktop study that is incorrect and its conclusion to zone a portion of the site OS2 has a detrimental impact on the proper planning and sustainable development of the area.

Change from:



Change to:



Chief Executive's Response

As stated in the draft LPF, *'The Planning System and Flood Risk Management'* guidelines follow the principle that certain types of vulnerable development should not be permitted in flood risk areas, particularly flood prone area, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development. As a result of the updated SFRA, changes in zoning were necessary compared to the previous plan and strengthened objectives for site specific flood risk assessments for lands at potential risk of flooding in the longer term (having regard to the OPW climate change scenarios flood projections) were required.

Residential development is considered a highly vulnerable development in the classification of vulnerability versus flood zones. This site is located in Flood Zone A, therefore the suggestion to extend the TC zoning (which allows for residential development) to include this land would not be considered appropriate, unless the flood risk 'Justification Test' is fulfilled.

In this case, the Justification Test is not satisfied because it fails to meet the following requirements:
(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement

(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement

While it is acknowledged that the Flood Relief Scheme represents a critical step towards safeguarding Arklow from the adverse effects of flooding, given the inherent possibility of flood defences overtopping or breaching, zoning is evaluated on the basis that such failure could occur. Flood zones are defined on a precautionary basis, therefore even with the presence of Flood defences, the underlying Flood Zone classification remains. A Flood Relief Scheme does not make Flood Zone A sites eligible for new residential development as the residual risk remains.

Please see Flood Risk maps accompanying this LPF (having regard to Addendum 1 and any updates arising from same).

Note there is no provision in the Planning & Development Act 2000 (as amended) requiring landowner 'permission' or 'consent' before their land may be rezoned as part of a development plan / variation.

On the basis of the above, it is not recommended to zone the lands as requested.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
49	Echelon Centres 142730 Data	<p>This submission relates to lands located at Avoca River Park (see map to follow).</p> <p>The following requests are made:</p> <p>Request 1: the portion of these lands, which are proposed to be zoned OS2, be rezoned Employment (E).</p> <p>Request 2: The northwestern portion of the lands which is not currently subject to any zoning is zoned E1.</p> <p>Request 3: Introduce a specific objective(s) for the lands 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</p> <p><i>"To continue to promote and facilitate the development of this site for a large-scale employment development, including ICT Facility development and associated infrastructure."</i></p> <p>In support of these requests the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Under the 2018-2024 LAP the subject lands were zoned E1 and are part of lands identified as the 'Employment Opportunity Site at Shelton' ▪ There is extant permission on most of the lands proposed to be zoned OS2. This application was lodged and granted permission in line with the previous E1 zoning under the current LAP and these lands have been cleared in line with this permission to prepare for development ▪ OS2 lands are not considered necessary in this location as there is a substantial buffer between the subject lands and the closest buildings to the north. There is ample OS2 zoning remaining where it is necessary along the east and south of the lands providing a buffer to the road and river respectively ▪ The rezoning of the northwest portion of the lands is to provide for a consistent land use across the lands in a single ownership and support development in line with E1 objectives at this location ▪ Include a specific objective for the subject lands which continues to support scale/space extensive, and high technology employment development on the lands. This would ensure that such development can continue to be facilitated ▪ The lands represent an 'energy park' location, having regard to the co-location of the ICT facilities with onsite energy centres, battery energy storage systems, and the integration of these aspects of the development with onshore infrastructure for a large-scale offshore windfarm

Change from:



Change to:



Chief Executive's Response

Request 1: It is acknowledged that permission has been granted in 2022 (Reg Ref 21/1080) for 2 No. Energy Centre building developments including all site clearance and enabling works required to facilitate the development and in 2023 (Reg. Ref 21/1080) for amendments to the permitted development. The site has already been cleared in line with the permission; therefore, it is considered appropriate to retain the Employment (E) zoning.

Request 2: These lands are completely zoned for Employment with much of the land already developed or permitted. There are no significant environmental, access, infrastructure or servicing issues, therefore, the CE is amenable to the inclusion of the northwestern portion of these lands.

Request 3: While the County Development Plan / draft LPF include objectives supporting high technology use, the CE is supportive of the inclusion of a new objective specifically supporting the development of these lands for ICT and energy related development.

Chief Executive's Recommendation

Alter Map No. 1 Land Use Zoning as follows:

Change from:



Change to:



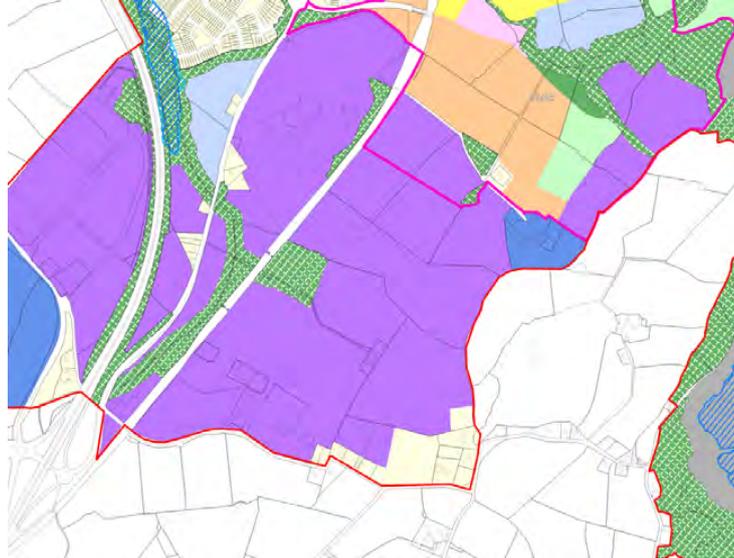
Add new objective:

ARK-XX 'To continue to facilitate the development of large-scale employment development (including ICT development and associated energy infrastructure) on E zoned lands at Avoca River Park.

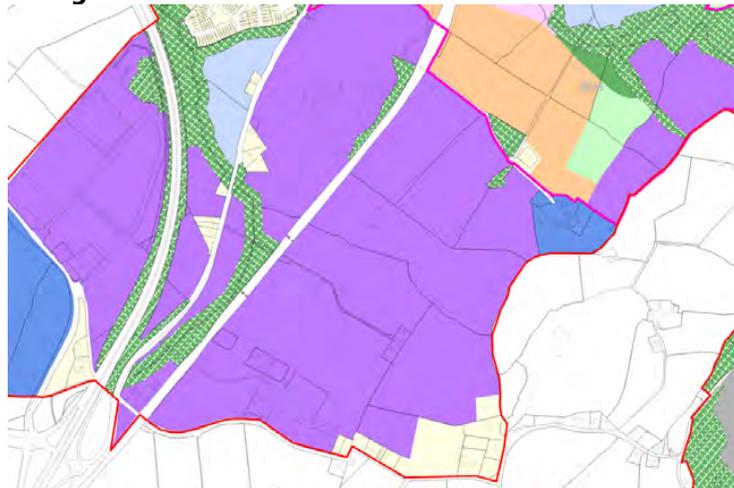
No.	Name	Issues Raised
52	Echelon Centres 143521 Data	<p>This submission relates to lands located north and northeast of Kish Business Park, within the townlands of Bogland and Money Big (as shown on the map to follow).</p> <p>The lands are currently zoned 'E1 – Employment Lands' and 'Mixed Use' under the 2018-2024 LAP. A number of requests are made in relation to these lands as follows:</p> <p>Request 1: It is requested that the OS2 zoning be removed from the subject lands</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ As part of extant permission on the subject lands, there is a detention lake permitted on the portion of the lands proposed to be zoned OS2. While this use may be generally permitted on OS2 land, it is considered appropriate to zone this area E1 in keeping with the zoning of the wider landholding <p>Request 2: Amend the proposed SLO4 boundary to exclude the subject lands</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ it is requested that the proposed boundary of SLO4 is revised to exclude this area to allow for lands with the same zoning to be grouped together and avoid the subdivision of one landholding and potential impacts such a subdivision (partially within an SLO area and primarily outside it) may have on the development of these employment lands ▪ it is not considered conducive to development to have one landholding with a consistent E1 zoning subdivided by this SLO boundary <p>Request 3: The proposed road through the lands featured in Map No. 5 be included on Map No. 1</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ This will ensure clarity and confirm provision of access to the employment lands from the north, i.e. the Arklow town side ▪ Note the first portion of such a link road already permitted on the landowner's lands <p>Request 4: Special employment objectives for the lands be incorporated, which recognise and reflect the permitted ICT and energy centre uses on the lands. The specific objective could read <i>'To continue to facilitate the development of large-scale employment development (including ICT development and associated energy infrastructure) on the lands at Bogland and Money Big'</i></p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Given the E1 zoning is proposed across almost all of the subject lands and the extant permissions for ICT and Energy Centres which were made in line with the zoning objective of the LAP to provide a "large, single undivided employment development" on the lands, it is considered a similar objective which continues to support and facilitate a high

technology use (including ICT Facility development and associated energy infrastructure in particular) should be included in the LPF, given the lands are in single ownership making such a development more straightforward

Change from:



Change to:



Chief Executive's Response

Request 1: It is acknowledged that extant permission exists for the portion of land proposed OS2. Zoning changes do not invalidate an existing, active planning permission, regardless of the proposed new zonings. The developer is entitled to build in accordance with the previously granted permission. The extant permission is identified in the GI audit which resulted in the designation of this portion of land being proposed OS2. However, the CE is amenable to this retaining employment zoning in keeping with the wider landholding.

Request 2: It is acknowledged that the subdivision of these employment lands is not a necessity and may impact the developability of the area as a whole. It is recognised the quantum of employment zoning embedded in SLO4 is adequate to support the area, therefore, the CE is amenable to removing the subject lands from SLO4 boundary.

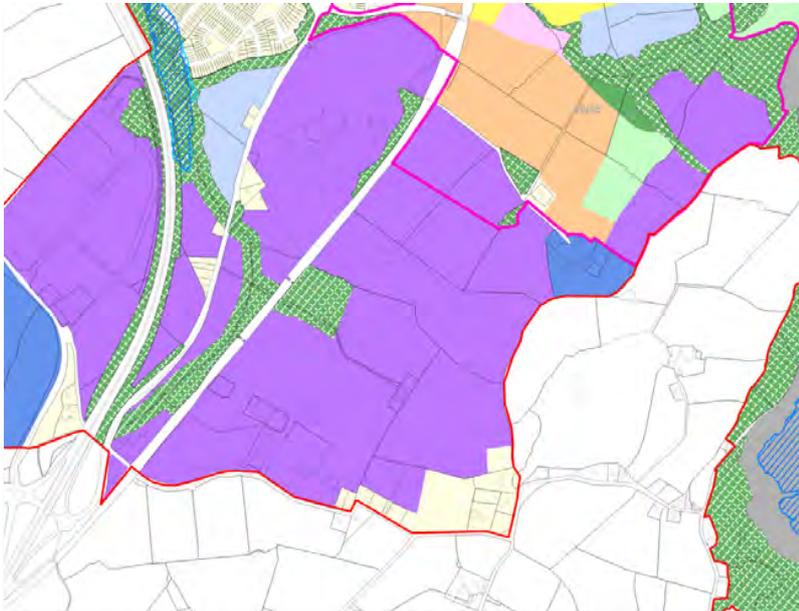
Request 3: The SLO4 link road does not appear on the zoning map as it is not designated as a National Primary or Secondary Road. It is not necessary to include all roads on the Land Use Zoning Map, as this helps maintain clarity and ensures a clear distinction between land use zoning and the road network.

Request 4: While the County Development Plan / draft LPF include objectives supporting high technology use, the CE is supportive of the inclusion of a new objective specifically supporting the development of these lands for ICT and energy related development. It is noted that the lack of a specific objective supporting energy projects on 'E' zoned lands precluded the granting of a previous application for a renewable energy installation (solar farm) on these lands associated with the permitted data centre, which is now emerging as an essential component for such projects.

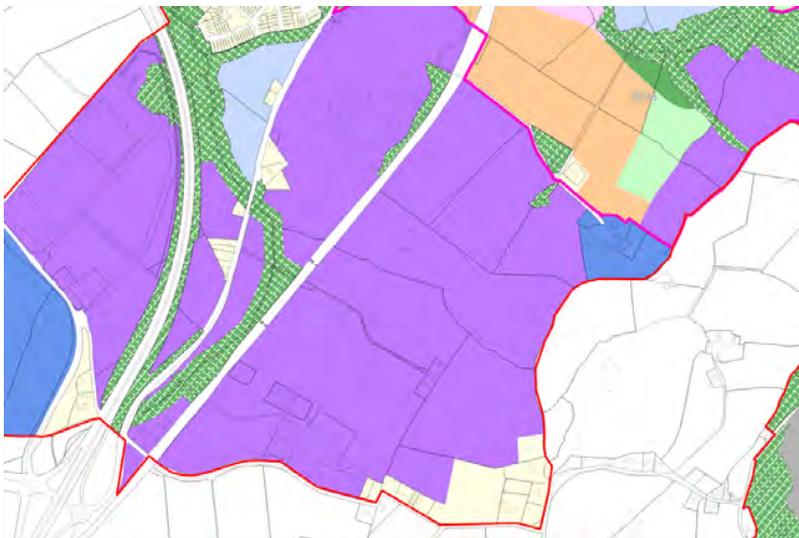
Chief Executive's Recommendation

Alter Map No.1 Land Use Zoning

Change from:



Change to:



Add new objective:

ARK-XX 'To continue to facilitate the development of large-scale employment development (including ICT development and associated energy infrastructure) on E zoned lands at Bogland and Money Big'.

Make any changes consequent to SLO4 text and concept sketch.

Ballyraine Upper

The submissions to follow all relate to the same area – lands at Ballyraine Upper as shown below.



No.	Name	Issues Raised
36	Keith Scanlon 084456	These submissions strongly support the protection and restoration of Glenart Forest and Woods as vital old wet woodland. It is urged to consider maximising OS2 zoning or, alternatively, dezoning the area as rural to prevent future development. Urban encroachment into key wildlife habitats need to be resisted, especially given recent precedents in other LPF areas.
44	Carina Holmes 103009	
53	Mellon & Kavanagh 140931	<p>This submission relates to lands measuring c. 7.5ha at Ballyraine Upper (as shown on the map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>It is requested these lands, zoned RN(2) and OS2 'Natural Areas' in the draft LPF, be zoned RN(1).</p> <p>In support of this rezoning, the following grounds are put forward:</p> <ul style="list-style-type: none"> Under the draft LPF, the proportion of the subject site zoned for New Residential has been reduced and its specific designation has changed to

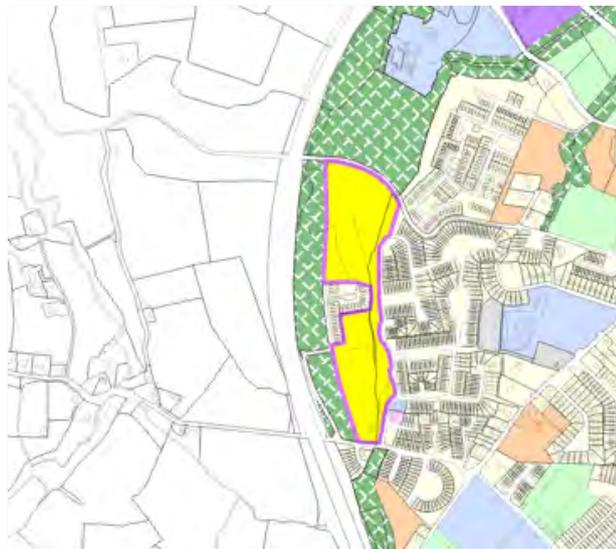
		<p>RN(2). The proportion of the site zoned for open space has increased (zoned OS2).</p> <ul style="list-style-type: none"> ▪ The landowners are committed to working with WCC including providing c.3.6ha of land within the landholding, set aside and dedicated entirely to green corridors and biodiversity ▪ A draft application for an LRD is nearing completion and will be submitted for the lands as they remain zoned under the existing LAP ▪ Note the delay in progressing the LRD application related to waiting for the draft LPF to be published, to incorporate objectives relevant to the site ▪ The Emyvale estate adjoins the subject site, this was built by the submitters and is still in their ownership. The estate is fully serviced, and existing pedestrian / vehicular connections are available from the Johnstown Road. ▪ The lands are currently zoned 'R28 - New Residential' and 'RE-Existing Residential' in the Arklow and Environs Local Area Plan 2018-2024) ▪ There have been several planning applications on the subject site previously and the refusal reasons are being addressed going forward ▪ The Revised NPF sets new housing targets and requires an uplift of 50% in housing output and need for additional zoned land for residential development ▪ Arklow is recognised under the RSES as a self-sustaining growth town under which key priorities include delivering sequential and sustainable urban extension at locations closest to the urban core and planning for an integrated and connected settlement overall ▪ The current LAP includes a number of road objectives relevant to the subject lands, including a proposed interchange at Lamberton Avenue and relief roads through the lands. Neither are included in the draft LPF and this is welcomed by the landowners ▪ The draft LPF is based upon the current core strategy in the CDP which does not account for the revised housing targets in the NPF, the Countywide allocation in the NPF Implementation Guidelines of the additional headroom ▪ With the completion of the wastewater treatment plant, the development of the Echelon data centre and the growth in remote working, will all result in an increase in the population of Arklow ▪ The subject lands are ready and available and should be zoned in their entirety for 'R1 -New Residential Priority 1' to meet this demand and national call to support the accelerated delivery of housing ▪ The subject lands meet all four criteria for RN1 zoning ▪ The lands are located within a walking and cycling distance from the town centre, social amenities, schools ▪ The subject lands are a natural extension to the neighbourhood and will be an infill development capitalising on existing infrastructure serving the area ▪ There is existing pedestrian and vehicular access to the landholding from the Johnstown Road to the south of the site ▪ The description of the northern part of the subject lands in the draft LPF is refuted. The only trees present are on the site boundary's which still stand to this day. The remainder of the lands have been in agricultural use, farmed fields. ▪ It is suggested to set aside a buffer to the west of the site that is to be left undeveloped. This area measures c. 3.6 ha. This is currently zoned for 'Open Space' under the existing LAP and is proposed to be zoned for 'Natural Areas' (OS2) under the draft LPF
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- Where these lands are not zoned for residential development in the final LPF, the landowners will incorporate the lands into the wider farm holding, connected via the M11 overbridge at the north of the site
- The proposal to include a riparian buffer at this location is not warranted. the body of water at this location is a man-made shore running along the boundary of the Woodlands estate. The shore collects surface water runoff from the field, and this shore remains dry for most of the year
- Giving regard to the fact that the landowner has been actively submitting planning applications on the site over the past 3 years, it is considered these lands should be zoned RN1

Change from:



Change to:



63

[J Mellon, D Kavanagh & C Mellon](#)
[160707](#)

This submission relates to lands at Ballyraine Upper (see map to follow).

It is requested that these lands, zoned OS2 be rezoned for residential development – RN(1).

In support of this submission the following grounds are put forward:

		<ul style="list-style-type: none"> ▪ It is stated that the landowners are open to working with WCC within the LPF, including setting aside approximately 9 acres of land dedicated entirely to green corridors and biodiversity ▪ The proposal to rezone the subject lands from New Residential to OS2 is not consistent with the LAP objectives and guidelines ▪ It shows errors in the analysis of the history and existing condition of the site, including disregard for the residents of the unfinished Emyvale estate which sits at the centre of the lands proposed to be rezoned ▪ In the draft LPF, the site is described as being “woodland on both the Ordnance survey 6 inch (1830s – 1840s) and 25 inch (1880s – 1910s) indicating continuous woodland cover from at least the early 19th century”. This statement is inconsistent with the reference maps. The entire Emyvale estate site is clearly shown as farmed fields on the maps [Appendix A & B attached to submission]. This represents almost half of the lands proposed to be rezoned. ▪ The assessment stating that the site remained wooded until 2022 is inconsistent with documentation attached to the submission. The area of the site joining Lamberton Avenue with the M11 motorway was a commercial forest consisting mainly of pine and spruce trees planted approx. 90 years ago. This coniferous forest was last felled by Coillte in c. 2000 [Appendix C]. ▪ The location of the proposed buffer zone on the eastern boundary of the site is situated in a highly developed area with the Woodlands estate all along the east side, the Emyvale estate on the west side and the M11 motorway in close proximity. In this regard the buffer zone on the proposal is not in keeping with the guideline ‘25m riparian buffer zones, where largely undeveloped, will generally be specifically protected via an appropriate ‘OS’ land use zoning objective, as per CPO 17.26 of the Wicklow County Development Plan 2022-2028’ as the site and general area is not ‘largely undeveloped’. ▪ There is a man-made shore running along the boundary of the Woodlands estate. This takes surface water runoff from the field. The shore remains dry most of the year [Appendix D]. ▪ The water from the east side of the valley is collected and piped all along the boundary at the bottom of the Woodlands estate, across the Johnstown Rd to the south side of the Mill Meadows estate and does not flow into any open watercourse ▪ The motorway on the west side boundary collects all the water from the west and north Ordnance survey map from c.2001 and ariel photo from 2006 shows the Emyvale area of site as dry grassland ▪ Waiting time for the WWTP to be built has resulted in the greenfield site becoming overgrown ▪ The location of the site is of primary importance to promote active travel. Walking and cycling routes to schools, social infrastructure and Glenart Forest ▪ The subject site meets all 4 of the requirements for new residential sites outlined in Section A:3.2.1 of the draft LPF, hence the zoning change would not be consistent with the guidelines for zero carbon travel ▪ The subject site was purchased by the landowners with the expectation that it would remain zoned to be developed. Two applications were lodged, one in Emyvale and one on the subject site, which were refused. The landowners
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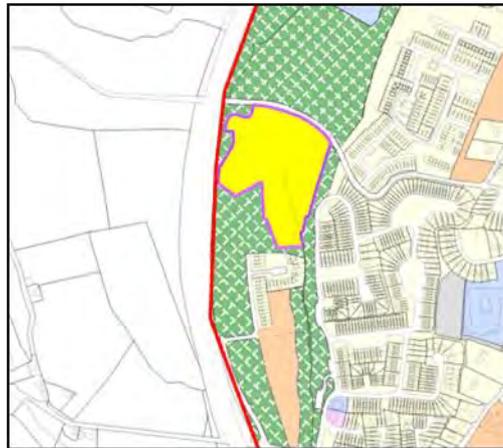
currently have an LRD application prepared for both sites addressing the points of refusal.

- The proposed rezoning renders the site unviable for completion. As it stands the proposal would result in the residents of Emyvale having no greenspace amenity [Appendix E]
- There is infrastructure in place for 79 houses, 33 of which are completed
- If the site is rezoned it will return to agriculture, which has little to no biodiversity value

Change from:



Change to:



Chief Executive's Response

Housing Targets / RN2 zoning

Once adopted, the Arklow Local Planning Framework (LPF) will form part of the County Development Plan (CDP) 2022-2028 through **Variation No. 6**. This Variation No. 5 does not propose wider changes to the CDP other than those needed to establish the new land use framework for Arklow. The publication of the "*NPF Implementation: Housing Growth Requirements*" in July 2025, which included new housing targets for Wicklow, has necessitated a review of the CDP beyond the remit of Variation 5 itself. WCC's implementation of these requirements, and how it affects the Arklow LPF is outlined below:

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets. To achieve the new housing targets, Proposed Variation 6 also proposes to introduce new Core Strategy Objectives including:

“Core Strategy Objective 1: All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both Phase 1 / Priority 1 and Phase 2 / Priority 2 lands will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan.”

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory ‘Call for Sites’ consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive’s Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE’s Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

Residential Phase 2 Lands

Chapter 3 (Core Strategy) of the CDP explains the relationship of subsidiary plans, which include the Arklow LPF, with the CDP. The relevant wording is outlined below; please note this version of the text is that proposed by Variation No. 6 (amended to include LPFs as subsidiary plans in the plan hierarchy).

From **Section 3.0: Introduction**

Whether zoning objectives are outlined in this development plan or in subsidiary local ~~area~~ plans, the Core Strategy of the development plan must be sufficiently specific in setting population targets and housing requirements across the overall area of the planning authority and the elements of the settlement hierarchy outlined above thereby to act as a clear framework for amendments to existing zonings or new zonings in lower-level plans. In turn, the population targets and housing requirements of lower-level plans must be consistent with the Core Strategy of the County Development Plan and this will be achieved either in subsequent amendments to such plans or in the preparation of new local ~~area~~ plan

From **Section 3.4: Zoning**

In the preparation of the updated LAPs/LPFs during the lifetime of this County Development Plan, development and growth objectives, including the amount of zoned housing land and phasing / prioritising objectives, shall take into account the zoning principles set out hereunder as well as the guidance set out in ‘Development Plans – Guidance for Planning Authorities’ (DoHLGH 2022) and any further Government or Ministerial policies / guidance in place at the time of the adoption of the LAP/LPF. In particular, residential development objectives including land zoning provisions will be made on the basis of providing enough housing land to meet the prevailing Core Strategy housing targets set out in

the County Development Plan at the time of adoption of the LAP/LPF, with flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and*
- (b) the LAPs/LPFs do not have to be formally amended to reflect any further changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation.*

Accordingly, the Arklow LPF has been prepared to comply with the housing targets contained within the prevailing Core Strategy of the CDP. The inclusion of 'New Residential Priority 1' and 'New Residential Priority 2' zoned land provides flexibility in the zoning provisions to ensure that:

- (a) the targets can be achieved in the event that unforeseen impediments to the development of certain lands arise; and
- (b) the LPF does not have to be formally amended to reflect any changes in the Core Strategy or population / housing targets that may arise during the lifetime of the County Development Plan due to changes to the National Planning Framework, Regional Spatial and Economic Strategy or planning legislation (as is proposed in Proposed Variation No. 6).

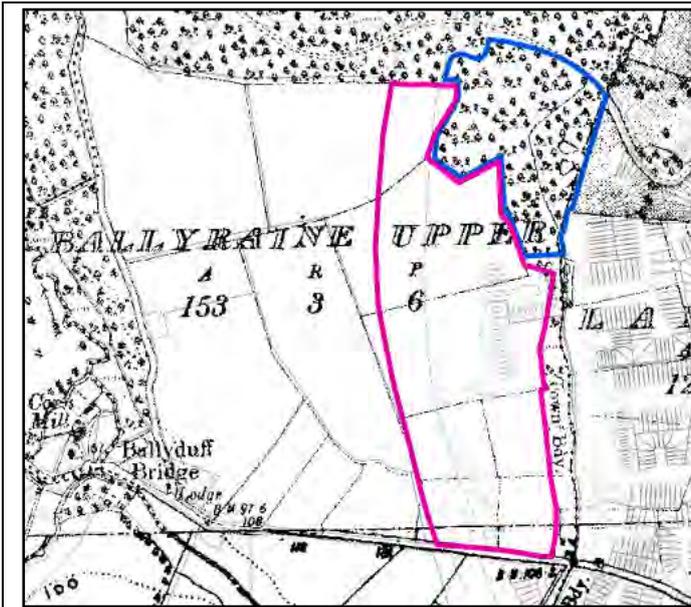
If Proposed Variation No. 6 is adopted, Arklow's 'New Residential Priority 2' zoned lands will automatically be considered on an 'equal footing' to RN1 lands. The CE considers this to be an appropriate response to the introduction of the new NPF Housing Growth Requirements, and to be the approach that complies with statutory plan making requirements. Therefore, it is not necessary to amend Variation No. 5 / the LPF to rezone Priority 2 lands to Priority 1.

'Natural Areas' (OS2) zoning

The northern parcel of the subject site has been visited multiple times in the preparation of the Draft LPF and at different times of the year by various professionals including the Council's Biodiversity Officer to assess the current conditions. The site exhibits clear and multiple indicators of wetland habitat and woodland legacy, even during dry conditions, frog spawn, live frogs and soil cracks have been observed. This site, or any equivalent wetland, is not suitable for development.

As set out in the GI report, this site appears as an ancient woodland on both the Ordnance Survey 6-inch (1830s–1840s) and 25-inch (1880s–1910s) maps, indicating continuous woodland cover from at least the early 19th century. It is mapped in the National Inventory of Ancient and Long-Established Woodland (ALEW) as possible ancient woodland. Although cleared in 2022, regrowth dominated by willow scrub (*Salix* spp.) and wetland vegetation was observed during a May 2025 site visit, confirming persistent wet conditions and the likely presence of a viable woodland seedbank and soil structure.

With regard to the suggestion that there lies an error in the analysis of the history of the site and that the OS maps are inconsistent with reference maps they provide in their submission. This statement is considered incorrect and attention is drawn to the map 6-inch map provided in Appendix B which does not outline the subject site but the area to the west (shown in pink). For clarity, please find attached a map illustrating the precise outline of subject site (shown in blue) overlaid on the 6-inch map.



The map provided by the submitter in Appendix C presents the site as farmed lands, surveyed date 1999 and revised date 2003. The CE does not dispute the site has been cleared previously, however, this does not disregard the history of ancient woodland that existed on the site or the current condition of the site.

The CE does not agree with the suggestion that a riparian buffer zone at this location is unwarranted. 25-inch historical mapping indicates that watercourses have been present on site for an extended time period. Inland Fisheries Ireland (IFI) has recommended the application of riparian buffer zones in this catchment, and their guidance advises a minimum 20m buffer to protect aquatic and riparian ecosystems. There is no provision in this policy guidance that excludes the application of a riparian buffer zone on the basis that a watercourse is man-made, which is refuted. The recommendations are driven by ecological protection functions, not whether the channel is natural or artificial.

Furthermore, the site lies adjacent to a tributary of the Ballyduff Stream, which is classified as having moderate ecological status and is at risk of not achieving good status, according to EPA monitoring. Through the source pathway receptor mechanism these watercourses connect to the Ballyduff stream and ultimately the Avoca River. Accordingly, the provision of buffer zones along these watercourses is appropriate to disrupt pollutant pathways and safeguard the of the wider ecological network.

With regard to addressing previous reasons for refusal in a future application, this is immaterial, as comprehensive assessments have already established that the site is fundamentally unsuitable for residential development in line with CDP principles and local, national, EU policy objectives for biodiversity, water quality, and climate resilience.

Policy Alignment

Rezoning the Ballyraine wetland site aligns strongly with multiple local, national, and EU policies and plans that emphasise the protection, restoration, and sustainable management of biodiversity and water resources including the **Wicklow Biodiversity Action Plan 2025–2030 (Draft)**, **Wicklow Climate Action Plan 2024–2029** and the **Wicklow County Development Plan 2022–2028**.

Retaining existing proposals provides a better level of environmental protection (i.e. locally important biodiversity site) and would better support alignment with and the achievement of the following Strategic Environmental Objectives defined for the CDP:

- To preserve, protect, maintain, and where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species
- Safeguard national, regional and local designated sites and supporting features which function as stepping stones for migration, dispersal and genetic exchange of wild species
- Enhance the biodiversity in line with National Biodiversity Action Plan and its targets
- To protect, maintain and conserve the County's natural capital

The proposed rezoning is consistent with a number of the objectives set out in Chapter 17 - Natural Heritage & Biodiversity and Chapter 18 – Green Infrastructure of the County Development Plan.

With regard to addressing previous reasons for refusal in a future application, while the landowner's efforts to do so are noted, new comprehensive assessments have clearly established that the site is fundamentally unsuitable for residential development in line with CDP principles and local, national, EU policy objectives for biodiversity, water quality, and climate resilience.

Therefore no changes are recommended.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
58	Michael & Michelle Kavanagh By hand	<p>This submission relates to 2 parcels of lands of c. 6.07ha to the west of the M11 and c. 4.04ha to the east of the M11 at Ballyruane, Coolgreaney (as shown on the maps to follow)</p> <p>The following two requests are made in this submission:</p> <p>Request 1: With respect to the c. 6.07ha to the west of the M11 at Ballyruane - inclusion of subject lands within the LPF boundary and zone for residential (RN1 or RN2)</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The subject lands have access off the Coolgreaney Rd and are appurtenant to the lands proposed for Employment ▪ The lands have service capacity and road access and in terms of development is 'ready to go' ▪ If zoned can provide residential within the lifetime of the LPF and therefore assist in alleviating the current housing crisis <p>Change from:</p>  <p>Change to:</p> 

Request 2: With respect to the lands of c. 4.04ha to the east of the M11 - change proposed OS2 zoning and rezone for Employment.

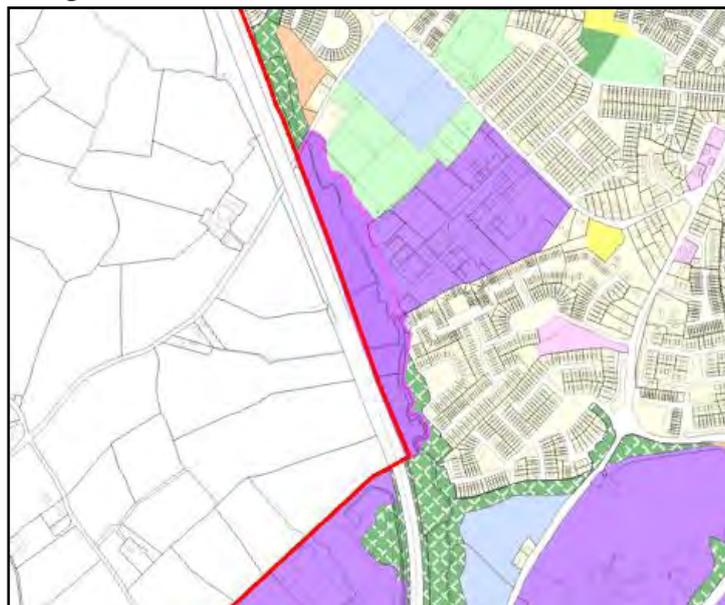
In support of this request the following grounds are put forward:

- The subject lands have access from the Coolgreaney Rd and are accessible to public services
- The subject lands adjoin the west side of the M11 embankment in a manner comparable to the employment-zoned lands further south
- Can provide additional road access to existing lands zoned employment to the east of the M11
- There is an embankment adjacent on the western perimeter of this section of land, however, there is a narrow strip of usable land which could have employment use potential

Change from:



Change to:



Chief Executive's Response

Request 1: Extending the zoning beyond the existing settlement boundary and beyond the physical boundary created by the M11 is not considered appropriate, as it is disjointed from the established built-up area within the M11, would facilitate unnecessary urban sprawl and is contrary to the principles of compact growth. The site is located in a rural context and not served by sustainable transport modes such as walking/cycling infrastructure or water, storm, sewer networks. There is sufficient residential zoning within the existing town boundary, within the M11 bound area, to meet the needs of the projected population throughout the lifetime of the plan and beyond, including the additional growth provided for by Proposed Variation 6. Therefore, it is not considered appropriate to zone the subject lands.

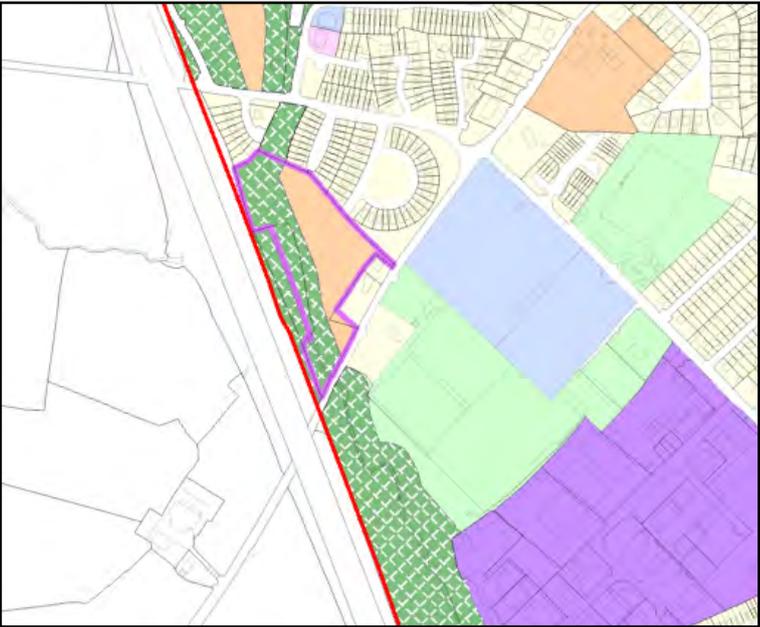
Request 2: The OS2 zoning is as per the current LAP 2018-2024. The Development & Design Standards specify a setback from the motorway of 20m for employment (industrial / commercial / business) and 100 for all other development. The subject lands fall within the buffer zone of the M11 and although a 20-metre buffer for employment land may indicate some development potential, this is precluded by the presence of a stream (and the setbacks required from same for ecological protection) and the site's location within Flood Zone A.

In relation to the request for additional E 'Employment' zoned lands, careful consideration has been given to the provision of E 'Employment' lands in the draft LPF. Having regard to the minimum areas set out in Section B.4.3 'Strategy for Economic Development', and the principles for the zoning of greenfield land for employment, it is not considered necessary to expand Employment land use zoning at this time, considering the quantum of undeveloped employment land provided in the draft LPF.

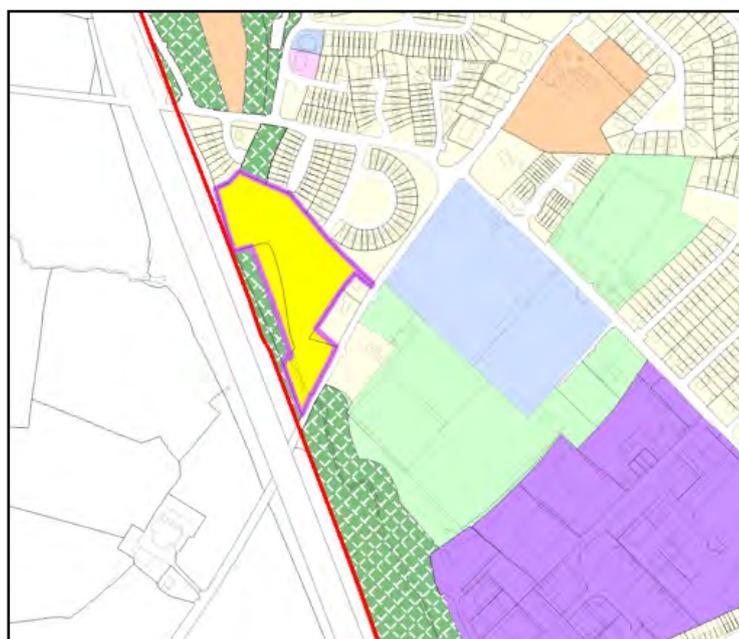
On this basis, it is not recommended to rezone the subject lands as requested.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
59	Patrick Gregan and Richard Conroy By hand	<p>This submission relates to lands of c.1.67ha at Lamberton, Coolgreaney Rd (see map to follow)</p> <p>It is requested that these lands zoned RN(2) and OS2 in the draft LPF, be zoned RN(1).</p> <p>In support of this submission the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Extant permission for residential development exists on the site (Reg Ref 19/1171) ▪ There is a live planning application (Reg Ref 25/1171) seeking an extension of time to allow the development to be completed ▪ Since the initial grant of permission, the WWTP has become operational so there is no longer a requirement for a temporary treatment/pumping facility on site ▪ The provision of a public footpath on the Coolgreaney Rd can now commence following the recent adjustment and setting back of the roadside boundaries at the northeast corner of the site ▪ As there is no requirement for an onsite effluent treatment/pumping facility and condition 3 can be complied with as a result of the boundary setback of the Coolgreaney Rd, there are no obstacles to commencement and completion of this development ▪ The land is serviced, has access and in terms of development is 'ready to go' ▪ If zoned the subject lands can provide residential development within the lifetime of the LPF and assist in alleviating the current housing crisis <p>Change from:</p> 

Change to:



Chief Executive's Response

The CE acknowledges an extant permission for residential development on the subject site, which has recently been extended until 01/12/2028. Zoning changes do not invalidate an existing, active planning permission, regardless of the proposed new zonings. The developer is entitled to build in accordance with the previously granted permission.

The Green Infrastructure Audit appended to the draft LPF details the rationale behind the increase in OS2 zoning in this area. To summarise, a watercourse (with an associated flood risk zone) exists on the site which together with the field adjacent, were identified as a moderately important urban habitat. While the existing residential lands were not included in the study, developing them could impact on an ecological corridor connecting the Avoca River to the Wexford Road. The culverted stream here could potentially be daylighted and it is considered that this should be protected insofar as is feasible for ecological connectivity in the area.

Therefore, it is considered appropriate to retain the OS2 zoning but with slight amendment to generally reflect the layout of the permitted development.

With respect to flood risk, it has been determined in the review of this submission that there is an area on the eastern side of the site, adjacent to the road, that is at risk of flooding. While permission has been granted in this area for open space and part of the access road for the permitted development, it is not appropriate to retain 'R' zoning on these lands as the Justification Test is not satisfied for this highly vulnerable use. Therefore it is recommended that a small area proposed to be zoned 'R' in the draft LPF be amended to 'OS2'.

Revised Housing Targets – Proposed Variation No. 6

In accordance with Ministerial guidance, a staged process of review of the new housing targets has been undertaken to determine how the Wicklow CDP should be varied to reflect these new targets and to ensure adequate lands are zoned and serviced to achieve these new housing aims. As advised by the guidelines, local plans should not be amended until this County level review / variation is carried out.

As a result, WCC is now progressing a further variation to the CDP, Proposed Variation No. 6, to specifically amend the Core Strategy in Chapter 3 to incorporate the new housing targets.

Proposed Variation No. 6 will ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements in the period up to 2031. It is the first of a series of measures being taken by WCC to accelerate the delivery of housing; it is supported by a non-statutory 'Call for Sites' consultation to inform future residential zonings to meet housing target requirements up to 2040.

Proposed Variation No. 6 went on display from 05 December 2025 to 16 January 2026 and the Chief Executive's Report on the submissions received to the proposed variation was issued in February 2026. It is intended that Proposed Variation 6 and the CE's Report will be considered by the elected members prior to the consideration of this Report on Proposed Variation No. 5 / Arklow LPF. In the event that Proposed Variation No. 6 is made, the population and housing target for Arklow will be considerably increased compared to the current target (increase from growth of 1,221 units 2016-2022 as set out in current County Development Plan to an increase of 4,056 units 2016-2031).

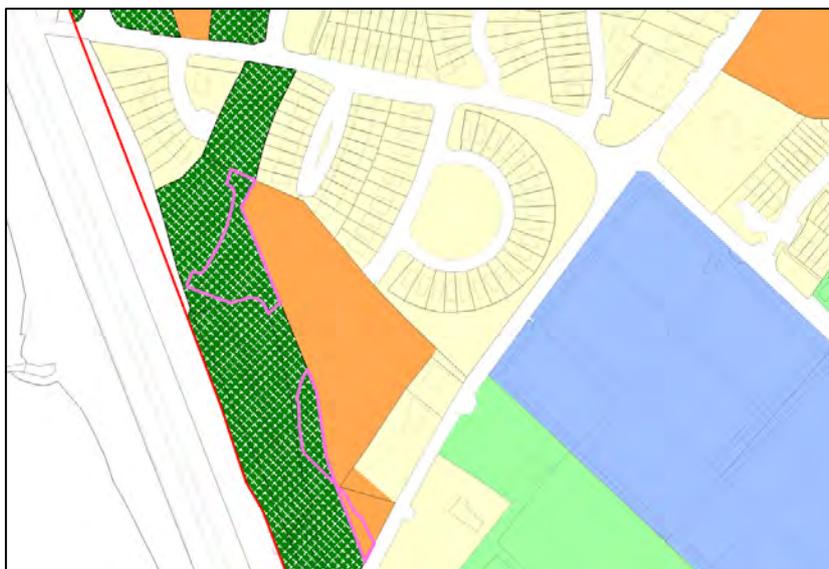
There is sufficient land proposed to be zoned for 'New Residential' use in the draft Arklow LPF to meet this increased target, if adopted, plus 'headroom'. Therefore there is no justification / need for the zoning of additional land, as suggested in this submission, for residential development to meet current or future housing needs.

Chief Executive's Recommendation

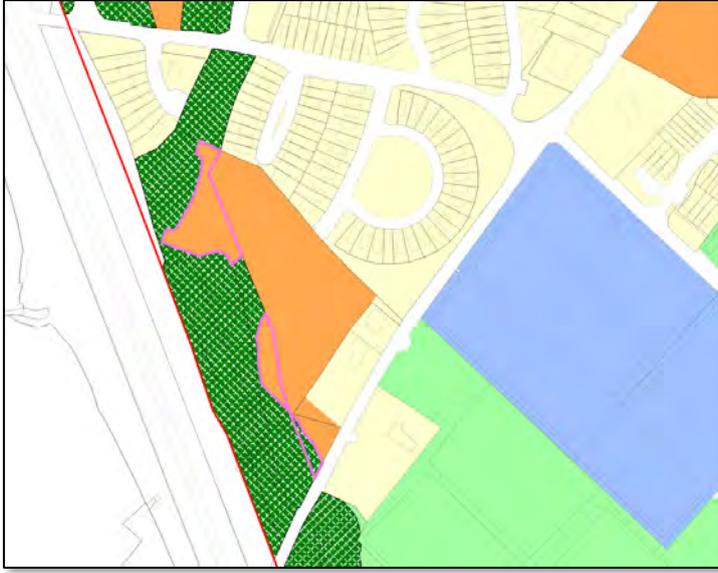
Alter Map No. 1 as follows:

- A: Change c. 0.3ha from 'OS2 Natural Areas' to 'RN2 – New Residential'
- B: Change c. 0.04ha from 'RN2 - New Residential' to 'OS2 Natural Areas'

Change from:

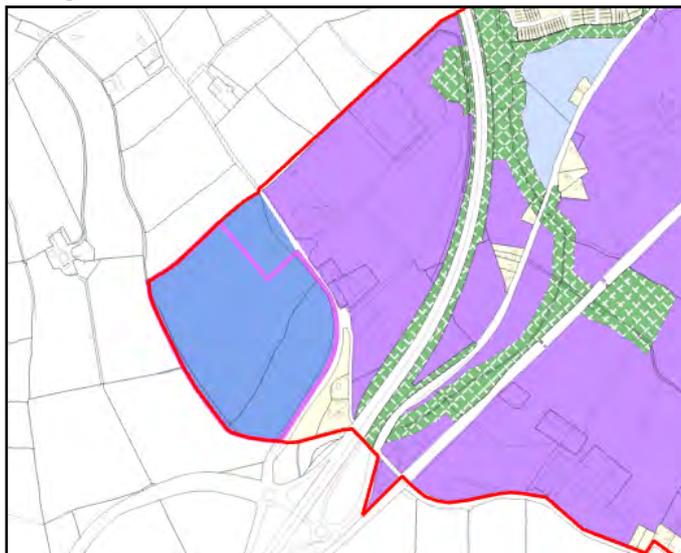


Change to:

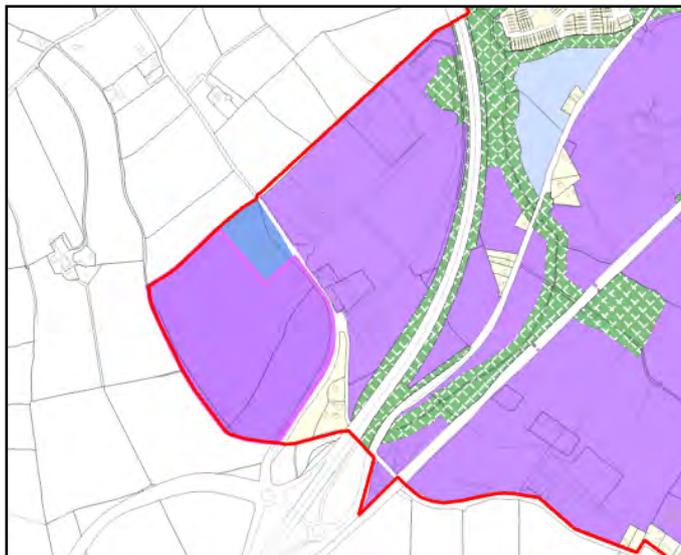


No.	Name	Issues Raised
61	Profile Properties 161714	<p>This submission relates to lands of c.14ha located at Ballynattin (see map to follow).</p> <p>This is a lengthy submission, which is difficult to summarise succinctly without omissions and the interested reader is therefore directed to the full submission (hyperlink to left).</p> <p>The submission makes the following requests:</p> <p>Request 1: It is requested that these lands, zoned 'Tourism' be rezoned for 'Employment'</p> <p>Request 2: Retain some of the lands for Tourism (c. 0.2ha)</p> <p>In support of these rezoning requests, the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The strategic growth of housing to meet population projections will require a commensurate provision of employment uses that create opportunities for local jobs. These lands facilitate tangible development and employment opportunities ▪ Permission had previously been granted on the site for a tourism development which demonstrates the sites capability of accommodating access and environmental services to cater to development ▪ The subject site is well connected via the M11 and R772 junction (at M11 Junction 21) ▪ The Arklow South Cycle and Pedestrian Improvement scheme provides 2.8km of segregated cycle track along the R772 Wexford Rd beside the submission lands at Ballynattin. This significantly improves the sustainable alternative transport options for workers and visitors travelling between the town centre and the submission lands ▪ The stability of power supply to the subject lands will be enhanced with the recent grant of permission for a 110kV ESB substation to the north of the site ▪ It is apparent that there are very limited uncommitted or accessible employment zoned lands available for further development by local businesses ▪ It is important to facilitate the zoning of lands that are in control of developers with tangible plans to establish or expand local businesses ▪ It has recently agreed terms with a local light industry operator, for the acquisition of c.34% of the submission lands (c. 4.7ha / 12 acres). This end user will initially seek to construct 90,000 sq-ft of light industrial development, creating immediate potential for c. 100 local jobs, and with further potential to increase to c. 200 jobs in the medium term ▪ It is not necessary to reserve all of the lands (40 acres) for tourism use, on the basis that this scale of hotel use has not materialised since these lands were first zoned for tourism. However, it is proposed to retain c. 5 acres of the landowners holding in Tourism zoning to facilitate future tourist accommodation initiatives <p>[An economic report is appended to this submission]</p>

Change from:



Change to:



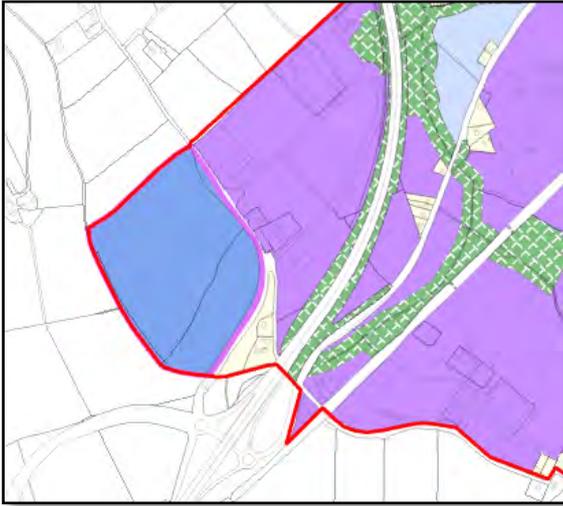
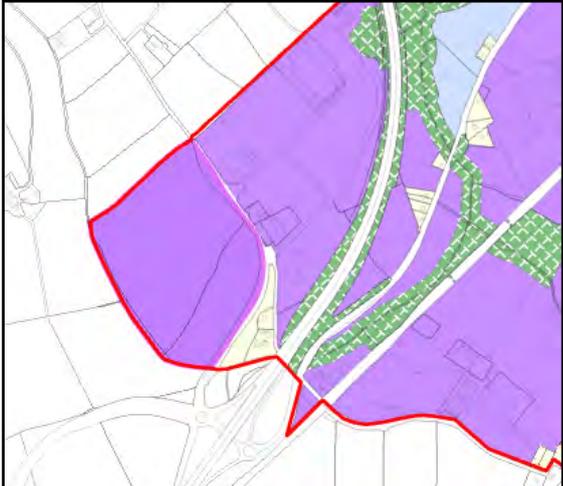
Chief Executive's Response

The CE does not support the suggested change in zoning for the following reasons:

- There is more than sufficient lands zoned for employment use in south Arklow, which is some distance from the town centre and from the majority of residential areas, and would be very much therefore car dependent
- These lands are located on the west side of the N11, where services and infrastructure (such as wastewater collection network, footpaths / cycleways) are not preset or limited
- 'Tourism' zoning is an essential zoning that is necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

No.	Name	Issues Raised
65	Echelon Centres 165059 Data	<p>This submission is in relation to lands at Ballynattin, northwest of the M11.</p> <p>It is requested that these lands, zoned Tourism (T) in the draft LPF, be zoned Employment (E).</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The lands have not seen any tourism development come forward and any development of this nature is unlikely given: <ul style="list-style-type: none"> - the proximity of the lands to the motorway - the surrounding context of employment uses, including the IDA Business Park to the north and extensive employment lands at and to the north of Kish Business Park to the east ▪ The motorway gives rise to noise which makes the site less suitable for tourism use, but would not cause any hindrance to employment uses ▪ The topography and scale of the site is more suited to employment development ▪ The lands are served by local access to utilities <p>Change from:</p>  <p>Change to:</p> 

Chief Executive's Response

The CE does not support the suggested change in zoning for the following reasons:

- There is more than sufficient lands zoned for employment use in south Arklow, which is some distance from the town centre and from the majority of residential areas, and would be very much therefore car dependent
- These lands are located on the west side of the N11, where services and infrastructure (such as wastewater collection network, footpaths / cycleways) are not preset or limited
- 'Tourism' zoning is an essential zoning that is necessary to support the sustainable development of the LPF area, and the location and area of these zones has been carefully determined in order to meet Wicklow County Development Plan requirements and sustainable development principles

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

4.2.12 Submissions related to Draft LPF (Part B:10) – Specific Local Objectives (SLO)

B.10.0 SLO1 Northern Waterfront Zone

No.	Name	Issues Raised
25	Arklow Ferrybank Developments 094108	<p>This submission relates to lands of c. 0.9ha at North Quay, Ferrybank (see map to follow).</p> <p>It is requested that the subject lands (Site C) and the wider lands within the Northern Waterfront be zoned for predominantly residential development.</p> <p>The following specific changes are sought:</p> <p>Request 1: Amend Section A:3.4.1 Northern Waterfront site (page 30) as follows:</p> <p><i>The development of the following vacant sites for predominantly residential use has the potential to maximise this areas waterfront location and proximity to existing services and recreational facilities</i></p> <p><i>Site C: Located to the southwest of the new wastewater treatment plant where planning permission was previously granted for a 5-8 storey apartment building and restaurant. Due to its location, this would be most suited to marine based industry and commercial use with potential for some to a high intensity residential development or with its southern side benefitting from waterfront views.</i></p> <p>Request 2: Under Section B:10, SLO1 Northern Waterfront Zone, omit paragraph three and replace with the following:</p> <p>There is potential on these lands for further marine based commercial and/or leisure activities on the sites with access to the waterfront, while high intensity mixed use (predominantly residential) development will be promoted on the northern sites, providing passive surveillance over the AOS lands to the north.</p> <p><i>There is potential on these lands for high intensity mixed use (predominantly residential) development providing passive surveillance over the AOS lands to the north and the North Quay to the south with any further marine based commercial and/or leisure activities on the sites adjoining and overlooking Arklow Marina.</i></p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ There is overwhelming planning policy support nationally and locally to provide for predominantly residential development of this brownfield site ▪ The core strategy doesn't align with the new housing growth targets issued by the NPF ▪ The NPF targets 40% of future housing development on infill/brownfield sites within the built footprint of existing urban area ▪ The RSES highlights the importance of redevelopment of brownfield sites for residential development, particularly underused/vacant or derelict sites

- The CDP places emphasis on promoting the compact growth of brownfield sites with no quantitative restriction on the number of residential units
- ARK17 highlights the Waterfront as priority area for housing growth
- A ten year planning permission was granted in 2006 for residential development. As stated in the Council's decision, the predominantly residential proposal would not injure the amenities on the area and would be acceptable in terms of traffic safety and convenience. These considerations remain unchanged, therefore, the LPF should explicitly support a predominantly residential development of the site
- There is no justification for marine based industry and commercial use with only some potential for residential development on the site
- The LPF confirms that these lands are fully serviced and available for immediate development



Chief Executive's Response

Request 1:

It is not considered appropriate to identify residential development as the 'predominant' use desired in the northern waterfront zone; clearly having regard to its waterfront / quayside location, its history of maritime / commercial use and its potential for further marine related commercial use, the area is suitable for a mix of uses, that would support both the housing demands arising in the area but also the need to provide for employment and services uses to the benefit of society. The objectives of the draft LPF clearly already allow for residential development in this area. In addition, it is not considered necessary or appropriate to provide details of previous planning applications in the text of the LPF. Therefore no change is considered necessary to the text.

Request 2:

The CE acknowledges an extant permission for residential development has been granted on the subject site. Zoning changes do not invalidate an existing, active planning permission, regardless of the proposed new zonings / objectives. The developer is entitled to build in accordance with the previously granted permission.

The text from the Draft LPF referred to above states *"There is potential on these lands for further marine-based commercial and/or leisure activities on sites with access to the waterfront, while high-intensity mixed-use (predominantly residential) development will be promoted on the northern sites, providing passive surveillance over the AOS lands to the north."*

This wording acknowledges the overall potential of the lands in their entirety. While this indicates that predominantly residential development will be promoted on the northern sites, it does not exclude the consideration of residential development on the waterfront.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

B.10.1 SLO3 Abbeylands & Tinahask Upper

No.	Name	Issues Raised
18	William Keogh 141932	It is submitted that access routes in SLO3 concept plan contravene European Legislation on traffic in residential areas. The suggested increase in traffic would increase the danger to pedestrians due to lack of sight lines and number of junctions within a 300m stretch of residential road.
24	Arklow Properties Ltd 090643	<p>This submission relates to lands of c. 6.75ha located at Abbeylands, identified in the LPF as 'SLO3'.</p> <p>Request 1: It is requested that the SLO3 concept plan be omitted and replaced with 'Map 4 Links & Access' of the approved Action Area Plan</p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ Given that the concept plan for SLO3 diverges significantly from the masterplan principles of AAP1 even conceptually, it is submitted such a plan is unnecessary <p>Request 2: Amend the statement that a '<i>masterplan for an entire SLO area may be required to be submitted as part of the first application within an SLO</i>' (page 102), as follows: <i>"Other than where there is an Action Area Plan approved by the County Council for an SLO, a masterplan for an entire SLO area may be required to be submitted as part of the first application within an SLO."</i></p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The approved Action Area Plan already contains a masterplan for the entirety of SLO3 that it would appear this statement does not acknowledge. <p>Request 3: Amend the fifth objective for SLO3 as follows: <i>"The CE (Community and Education) zoned lands in this SLO area measure c.3.5ha of which minimum area of 2ha shall be reserved for a future primary school; the alignment and design of the access route from SLO4 through SLO3 and through the CE zoned lands shall ensure such a 2ha site is maintained and provided with suitable accessibility onto that route. Proposals for development on RN1 lands will have regard to this requirement and provide for the continuation of the access route to the north of the CE zoned lands in accordance with the design standards for the route to be provided by the Planning Authority.</i> <i>The remaining CE zoned lands shall be reserved for the development of future community and recreation facilities, of a format to be determined by the Local Authority. These lands shall be developed and made available for community use prior to the development of RN2 lands in this SLO3.</i> <i>Any CE lands located to the west of the new distributor road shall be well connected to all surrounding residential areas, the new distributor road and to the existing railway crossing to the west of the RE lands."</i></p> <p>In support of this request the following grounds are put forward:</p> <ul style="list-style-type: none"> ▪ The current objective is overly broad in scope and lacks sufficient clarity. It does not clearly specify the nature of the development that cannot

		<p>proceed, nor does it explain how the access route will be secured or by whom.</p> <ul style="list-style-type: none"> ▪ It would result in a high degree of uncertainty for landowners as to when development can take place on the residential lands in the SLO that are designated as 'Priority 1' in the draft LPF ▪ As the objective seeks that the alignment of the road ensures that 2ha of zoned land is reserved for a future primary school with suitable accessibility onto it, it is unreasonable that any other development, particularly that which is not directly contingent on the alignment of this road, cannot be undertaken
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Chief Executive's Response

With respect to traffic concerns raised, the Draft LPF and associated SLO / concept sketches does not dictate where all new local road connections will occur, and this is a matter that would be addressed at application stage, where detailed assessment of local traffic conditions, accessibility, safety etc will be carried out.

Request 1: While the purpose of a concept plan is to enable a visualisation of potential development; it does not dictate exactly the design of any future development on the lands, which will be impacted by a range of factors including (but not limited to) final road layout, topographical or drainage constraints, land ownership etc. As acknowledged in this submission it is clearly states in the Draft LPF *'These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs...'*

While there are slight alterations in the positioning of some indicative internal link roads to accommodate the concept design, the layout generally reflects the main distribution road, access and link junctions from the previously agreed Action Area Plan. The developers have the scope to adjust the link roads in their own future proposals and these will be considered by Development Management at the planning application stage in accordance with statutory legislation and guidance.

Request 2: The requirement to submit a masterplan as part of the first application in an SLO indicates that such a document may generally be required, this does not preclude those with an agreed Action Area Plan in submitting a previously agreed AA as the masterplan. The agreed AAP could be considered as a masterplan if it is in line with the objectives of the SLO. Therefore, it is not considered appropriate to amend this statement.

Request 3: The objectives of the SLOs have been carefully considered for the overall success of their development. This objective is to ensure that development proceeds in an orderly manner consistent with the principles of the CDP, and that road infrastructure is delivered in tandem with residential development. To include wording stating that development proposals on RN1 lands must 'have regard' to the following requirement – *'alignment and design of the access route from SLO4 through SLO3 and the CE-zoned lands must preserve a 2ha site, ensure it has appropriate access onto the route, and allow for the route's continuation north of the CE lands in line with Planning Authority design standards'*, is not sufficient to guarantee delivery.

On foot of these submissions, no change is recommended.

Chief Executive's Recommendation

No change to draft Arklow LPF/Variation.

Responses to the Consultation Submissions relating to the Draft SEA Environmental Report and Draft NIR of the Variation No. 5 of the Wicklow County Development Plan and the Arklow Local Planning Framework

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
Environmental Protection Agency	<p><u>Mitigation Measures</u> Where the potential for likely significant effects have been identified, appropriate mitigation measures to avoid or minimise these should be provided. The Variation should also include clear commitments to implement the mitigation measures.</p> <p>We note that a commitment is made to facilitate coastal defence protection and defence works being carried out (reference ARK80 p111 of the SEA ER). There is merit in clarifying whether a specific plan is proposed to coordinate these activities and whether the requirements of the SEA and Habitats Directives in particular have been (or will be) taken into account in this regard.</p>	<p>Noted. Appropriate mitigation measures have been integrated into the Variation/LPF.</p>	<p>None</p>	<p>None</p>
	<p><u>Monitoring</u> The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.</p> <p>Given that a previous iterations of the Wicklow County Development Plan exist, providing information on the outputs of the previous monitoring programme would be useful to consider. This would help inform how effective the existing monitoring programme has been, and how it can be improved or further developed.</p> <p>If the monitoring identifies adverse impacts during the implementation of the Variation, Wicklow County Council should ensure that suitable and effective remedial action is taken.</p>	<p>Noted. The monitoring programme has been designed considering the existing monitoring framework for the County Development Plan (CDP).</p>	<p>None</p>	<p>None</p>

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<p><u>Ireland's State of the Environment Report 2024</u> In October 2024, the EPA published the latest iteration of our 4-yearly State of the Environment Report. This report should be considered, and relevant aspects integrated as appropriate, in implementing the Variation outputs/recommendations. It is available at: https://www.epa.ie/our-services/monitoring-assessment/assessment/state-of-environment-report/.</p>	<p>The SEA Environmental Reports have been prepared to take account of the EPA's latest State of the Environment Reports.</p>	<p>None</p>	<p>None</p>
	<p><u>Future Amendments to the Variation</u> You should screen any future amendments to the Variation for likely significant effects.</p>	<p>Noted.</p>	<p>None</p>	<p>None</p>
	<p><u>SEA Statement – "Information on the Decision"</u> Once the Variation is adopted, you should prepare an SEA Statement that summarises:</p> <ul style="list-style-type: none"> • How environmental considerations have been integrated into the Variation; • How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation; • The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and, • The measures decided upon to monitor the significant environmental effects of implementation of the Variation." 	<p>Noted.</p>	<p>None</p>	<p>None</p>
<p>National Environmental Health Agency HSE</p>	<p><u>Review of written statement</u></p> <ul style="list-style-type: none"> • Under Section B3 Housing Development it is recommended to add the word "Resilient" to Sustainable Communities. It is also recommended to specifically integrate the principle of Disaster Risk Reduction and utilise the Sendai Framework for Disaster Risk Reduction 2015 – 2030 as a tool to reduce the risk of disaster. • It is recommended to reference the SDGs in the final plan and demonstrate how the plan contributes towards the meeting of all 17 SDGs and 169 targets by 2030. • It is recommended to integrate actions that move towards a circular economy. 	<p>Noted. It is noted that various climate positive measures have already been integrated into the Variation/LPF. It is assessed that the Variation/LPF will support the following existing SEOs defined in the CDP:</p> <ul style="list-style-type: none"> • To minimise emissions of greenhouse gasses 	<p>None</p>	<p>None</p>

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<ul style="list-style-type: none"> • It is recommended to consider the inclusion of mechanisms that better enable the residents of Arklow to grow their own food. • It is recommended to plan an Arklow that has the best quality air to protect the community and minimises noise to health protection standards. • It is recommended that metrics are set to help determine if Arklow is in fact a healthy place following implementation of the plan. • It is recommended to assess the health impact of the plan in a holistic manner that goes beyond measuring the availability of health care services (GPs, Pharmacies etc.) but assesses those wider environmental determinants of health such as action on climate change, air quality, noise, active travel journeys and other indicators that could be set. <p><u>Climate Change</u> The plan should support actions that move Ireland to “a low carbon, climate-resilient, and environmentally sustainable economy by 2050” as set out in the Climate Action and Low Carbon Development Act 2015 – 2021. The latest Climate Action Plan 2024 (out for public consultation as this submission is written) should form the basis for developing a low carbon, climate-resilient, and environmentally sustainable Arklow by 2050 with interim targets for 2030.</p> <p><u>Sustainable Development Goals</u> The plan should support action towards the achievement of the Sustainable Development Goals as set out in Agenda 2030. Specifically it should deliver towards SDG 3, which is to “ensure healthy lives and promote well-being for all at all ages”. One of the most relevant in the context of this Local Area Plan is SDG 11 “sustainable cities and communities” The plan should align with the Government’s National Implementation Plan for the Sustainable Development Goals 2022 – 2024. A key principle to deliver is on the principle of “Leave No One Behind”.</p> <p><u>Noise</u> Noise is widely recognised as the second biggest environmental determinant in Europe after air pollution. The plan should have a noise map of the area and look</p>	<ul style="list-style-type: none"> • Integrate sustainable design solutions into the County’s infrastructure (e.g. energy efficient buildings; green infrastructure). • Contribute towards the reduction of greenhouse gas emissions in line with national targets. • Promote development resilient to the effects of climate change • Promote the use of renewable energy, energy efficient development and increased use of public transport. <p>A new SEO has also been defined for the CDP/LPF, as follows:</p> <ul style="list-style-type: none"> • Support in the delivery of the Arklow Decarbonisation Zone objectives. <p>The various climate positive measures currently defined in the Variation/LPF will create climate co-benefits for air quality, water quality, biodiversity etc. and will</p>		

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<p>to ensure existing noise levels that are potentially detrimental to health are minimised. The plan should also look to ensure future developments do not breach noise thresholds at day, evening and night times that are potentially harmful to health and/or are a nuisance to people and their pets/animals.</p> <p><u>Water Quality and Waste Water</u> The plan should look to protect existing and future planned water bodies from potential sources of pollution. In the context of growth the consultation portal refers to the need for an extra 1,221 new homes between now and 2031 and that these homes must be provided in a sustainable manner. In the context of this growth, water supply and waste water treatment capacity must be capable of coping with existing and future growth loads. The plan should look to enhance water bodies and provide a greater variety of amenity to the people of Arklow and beyond including the tourism opportunities.</p> <p><u>Circular Economy/Waste</u> The plan should look to be aligned with the Circular Economy and Miscellaneous Provisions Act of July 2022. The plan should follow the principles of the waste hierarchy to first of all eliminate the generation of waste in the first place, including single use items, thereafter reduce, reuse and recycle waste including supporting “the right to repair” and work towards a Circular Economy. In drafting the plan reference could also be made to <ul style="list-style-type: none"> • A Resource Opportunity – Waste Management Policy in Ireland 2012 and the more recent • National Waste Management Plan for a Circular Economy 2024 - 2030 </p>	<p>underpin and support the achievement of a range of Sustainable Development Goals.</p> <p>The effects of noise on existing and proposed development has been considered under the CDP already (See the Noise Pollution Objectives defined).</p> <p>A robust suite of water quality protection/restoration measures have been integrated into the current CDP, in addition to the Variation/LPF.</p> <p>It has been assessed that the Variation/LPF aligns with/supports circular economy principles (e.g., ARK 67).</p>		
Department of Climate, Energy and the Environment	<p><u>Climate Action</u> We request the Local Authority consider the following when preparing the LPF:</p> <ul style="list-style-type: none"> • The Long-term Strategy on Greenhouse Gas Emissions Reductions which sets out indicative pathways, beyond 2030, towards achieving carbon neutrality for Ireland by 2050. • Ireland’s National Climate Objective and the European Climate Law. 	<p>Noted. It is noted that various climate positive measures have already been integrated into the Variation/LPF. It is assessed that the Variation/LPF will</p>	None	None

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<ul style="list-style-type: none"> The new National Adaptation Framework (NAF) which sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. In all matters relating to Climate Action, local authorities should, in addition to consulting with their Climate Action Teams, consult directly with their own CAROs. <p>We would also draw attention to the framework of Agenda 2030 and the Sustainable Development Goals and ask that the Council pay particular attention to the targets outlined in SDG13 –Climate Action.</p> <p>Recommendations</p> <ul style="list-style-type: none"> The LPF should support the implementation of the national Climate Action Plan, the Longterm Strategy on Greenhouse Gas Emissions Reductions, the National Climate Objective, the National Adaptation Framework and the UN Agenda 2030 and the Sustainable Development Goals through the preparation of effective objectives and actions for climate action in LPF area. The Department recommends that an objective and / or policy is included in the LPF to support the implementation of CAP25 (and annual revisions thereof). <p><u>Local Authority Climate Action Plan</u></p> <ul style="list-style-type: none"> The Department recommends that the LPF include further objectives and / or policies to ensure the implementation of the Wicklow County Council LACAP, DZ priority areas and related actions, thereby ensuring consistency and alignment between both Plans. <p><u>Renewable Energy</u></p> <p>We would also ask the Council to consider the particular targets set out in Agenda 2030 regarding SDG7 - Affordable and Clean Energy.</p> <p><u>Marine Planning</u></p> <p>It is recommended that the plan include a policy to facilitate land sea interactions and support sustainable marine related development in appropriate locations.</p>	<p>support the following existing SEOs defined in the CDP:</p> <ul style="list-style-type: none"> To minimise emissions of greenhouse gasses Integrate sustainable design solutions into the County's infrastructure (e.g. energy efficient buildings; green infrastructure). Contribute towards the reduction of greenhouse gas emissions in line with national targets. Promote development resilient to the effects of climate change Promote the use of renewable energy, energy efficient development and increased use of public transport. <p>A new SEO has also been defined for the CDP/LPF, as follows:</p>		

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<p>The proposed plan should be consistent with the policies and objectives of the National Marine Planning Framework (NMPF), which outlines the Government’s vision, objectives and marine planning policies for each marine activity. NMPF Infrastructure Policy 1 supports appropriate land-based infrastructure which facilitates marine activity (and visa versa) should be supported. Proposals for appropriate infrastructure that facilitates the diversification or regeneration of marine industry should be supported.</p> <p>The consideration of land-sea interactions in the plan will support the implementation of NMPF Infrastructure Policy 1, support the sectoral policies of the NMPF and the implementation of Designated Maritime Areas Plans (DMAPs), including for Offshore Renewable Energy (ORE) such as the South Coast Designated Maritime Area Plan (SCDMAP) for ORE and future National DMAP for ORE.</p> <p><u>Offshore Renewable Energy</u> Any policies within the Proposed Variation should not undermine the objective of the various plans and frameworks related to ORE.</p> <p><u>Electricity Grid</u> The Department recommends that the LPF should include reference to:</p> <ul style="list-style-type: none"> • Shaping Our Electricity Future 1.1, EirGrid’s updated roadmap for the development of the transmission grid out to 2030 to deliver on the 80% renewable energy targets. • ESB’s Networks Strategy: Networks For Net Zero, which sets out ESB Networks’ role in enabling the delivery of the Government’s Climate Action Plan 2023 and supports the decarbonisation of the electricity system by 2040. <p><u>Energy Security</u> The LPF should include objectives supporting local and community based renewable energy projects to address Government policy and strategy for sustainable, secure and affordable energy.</p> <p><u>Built Environment and Heating</u> The Department recommends that the Local Authority continue to implement policies such as the Social Housing Energy Efficiency retrofit programme, to</p>	<ul style="list-style-type: none"> • Support in the delivery of the Arklow Decarbonisation Zone objectives. <p>The various climate positive measures currently defined in the Variation/LPF will create climate co-benefits for air quality, water quality, biodiversity etc. and will underpin and support the achievement of a range of Sustainable Development Goals.</p> <p>The Variation/LPF is in alignment with marine-related legislation and plans and supports, in a balanced and appropriate manner, both renewable energy infrastructure development and coastal/marine protection – having regard to the remit of the local authority and the scope of the Plan.</p> <p>It has been assessed that the Variation/LPF aligns</p>		

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<p>support the ambitions of the National Residential Retrofit Plan, in particular, the development of the electrification of heating, having regard to the CAP25, WCDP, and the RSES.</p> <p>This also aligns with SDG targets relating in particular to SDG 11 – Sustainable Cities and Communities and SDG 7 – Affordable and Renewable Energy.</p> <p><u>Compact Growth and District Heating</u></p> <p>The Department recommends that the Local Authority examine the potential of district heating, including district heating derived from waste heat and geothermal energy, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies, having regard to the CAP25, RPO 7.38 of the RSES, CPO 16.34 of the WCDP, Wicklow County Council LACAP, NSO 9 of the NPF the National Heat Study, and the Government’s Policy Statement on Geothermal Energy for a Circular Economy. As such, policies in support of same are encouraged in the draft LPF.</p> <p><u>Circular Economy</u></p> <p>The Local Authority should support circular economy principles in the draft LPF and implement policy for same.</p> <p><u>Waste Management</u></p> <p>The LPF should have regard to the guidance “Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects” and give effect to them through the objectives of the plan.</p> <p><u>Transport</u></p> <p>The Local Authority is requested to consider the measures within the CAP25 and sustainable transportation objectives of the WCDP relating to sustainable mobility and reducing the demand for transport journeys by private vehicles (Avoid-Shift -Improve Framework) through more effective land use and transport planning integration and compact growth principles when drafting the LPF.</p>	<p>with/supports circular economy principles (e.g., ARK 67).</p> <p>Sustainable modes of transport are appropriately supported by the Variation/LPF. The promotion of sustainable travel and transport was a key consideration when evaluating emerging alternatives to the LPF.</p> <p>The climate-related measures defined in the LPF will lead to co-benefits for air quality. The LPF supports the achievement of existing SEOs for air quality in the CDP, including the following:</p> <ul style="list-style-type: none"> • Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency. 		

Consultee	Submission Text	Detailed Response	Changes to SEA ER	Changes to NIR
	<p><u>Air Quality</u> Air Quality has a significant impact on the health of local communities. The Department encourages the Local Authority to have regard to the Clean Air Strategy for Ireland, bearing in mind the impacts of measures adopted in the draft LPF on current and future air quality.</p> <p>There are specific limits on air pollution for each station across the country which are set out in the Clean Air Strategy and the new EU Air Quality Directive. The Local Authority is requested to have regard to limits on air pollution and ensure that any measures set out in the LPF will not negatively impact on future air quality. The Local Authority is requested to be mindful if any potential measures are required to meet these air pollution limits in future plans.</p>			



Comhairle Contae Chill Mhantáin Wicklow County Council



ADDENDUM I

TO THE STRATEGIC FLOOD RISK ASSESSMENT

OF THE

PROPOSED VARIATION NO. 5 TO THE WICKLOW CDP INCLUDING THE DRAFT ARKLOW LPF 2026

**ADDITIONAL STRATEGIC FLOOD RISK ASSESSMENT OF ELEMENTS OF THE PROPOSED
VARIATION / DRAFT LOCAL PLANNING FRAMEWORK**

AND

**STRATEGIC FLOOD RISK ASSESSMENT OF CHIEF EXECUTIVE'S RECOMMENDED
ALTERATIONS TO THE PROPOSED VARIATION / DRAFT LOCAL PLANNING FRAMEWORK**

1 Introduction

A Strategic Flood Risk Assessment (SFRA) of the Proposed Variation / draft Arklow Local Planning Framework 2025-2031 was undertaken and prepared in accordance with *'The Planning System and Flood Risk Management - Guidelines for Planning Authorities'* published in 2009 by the Department of the Environment, Heritage and Local Government and Office of Public Works (Flood Risk Guidelines).

The Proposed Variation / draft Local Planning Framework and associated reports, including the SFRA, were published in October 2025 and observations invited from the public and prescribed authorities. This 'Addendum I' to the Strategic Flood Risk Assessment of the Proposed Variation / draft Local Planning Framework has been prepared on foot of submissions received, and sets out:

- (a) Additional data and explanation of elements of the original SFRA for the Proposed Variation / draft Local Planning Framework that require additional clarification and explanation, in order to address issues raised in submissions received;
- (b) A Strategic Flood Risk Assessment of any Recommended Alterations to the Proposed Variation / draft Local Planning Framework, as set out in the Chief Executive's Report. On completion of the consideration by the members of the CE's report, a final set of proposed alterations to the Proposed Variation / draft Local Planning Framework may be agreed. This Addendum will be updated at that stage to include only an assessment of those proposed alterations approved by the members;
- (c) Additional flood maps.

It should be noted that changes are not made to the original Strategic Flood Risk Assessment Report at this stage; this Addendum forms part of the documentation of the ongoing Proposed Variation / draft Local Planning Framework - making process. It supplements and should be read in conjunction with the Strategic Flood Risk Assessment Report published in October 2025.

2 Additional information regarding SFRA of the Proposed Variation / draft Local Planning Framework

- 2.1 Though the public consultation process, concerns were raised that there were discrepancies in flood zone mapping in relation to flood extents shown for the Arklow Flood Relief Scheme and the corresponding flood zone (i.e. Flood Zone A) on maps set out in the LPF. Having reviewed the range of datasets included within the flood zone layers, and in light of the submission of the OPW, the CE has updated the relevant flood mapping. The CE is satisfied that any discrepancies were in relation to Flood Zone A only and not Flood Zone B.

In order to address this concern, set out to follow is additional flood risk assessment of any location identified in the updated flood mapping as being in Flood Zone A. The additional sites were generally previously assessed as being in Flood Zone B.

This additional layer will also be added to the following Draft LPF maps, which are appended to the end of this document:

- Map No. 4A Flood Risk - Present Day (Update)
- Map No. 4B Flood Risk - Present Day & Land Use Zoning (CE Recommendations)

3.0 Updated Flood Mapping

The purpose of this assessment is to identify any locations identified in updated flood mapping that were not previously identified as Flood Zone A in the original SFRA and then to evaluate the suitability of the zoning proposed for said locations.

Map key:



Flood Zone A shown in original SFRA



Flood Zone B shown in original SFRA



Flood Zone A: Additional identified areas

Objectives and draft zonings:

-  **Arklow LPF Boundary**
-  **Road Objectives**
-  **Specific Local Objective**
-  **RN(1): New Residential - Priority 1**
-  **RN(2): New Residential - Priority 2**
-  **RE: Existing Residential**
-  **TC: Town Centre**
-  **LSS: Local Shops & Services**
-  **PU: Public Utility**
-  **CE: Community & Education**
-  **T: Tourism**
-  **WZ: Waterfront Zone**
-  **AOS: Active Open Space**
-  **OS1: Open Space**
-  **OS2: Natural Areas**
-  **E1: Employment**
-  **EX: Extractive Industry**

The following land use zonings are applicable to these additional areas:

ZONING	OBJECTIVE	DESCRIPTION
RE: Existing Residential	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.
RN1: New residential Priority 1	To provide for new residential development and supporting facilities during the lifetime of the LPF.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
RN2 New residential Priority 2	To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement in accordance with the objectives set out in the LPF.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
TC: Town Centre	To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.	To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasise on regeneration, infill town and historic centre conservation; ensuring priority for public transport where applicable, pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric.
LSS: Local Shops & Services	To provide for small scale local neighbourhood shops and services	To facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from lands designated town centre.
E:	To provide for the development of	To facilitate the further development and improvement

ZONING	OBJECTIVE	DESCRIPTION
Employment	enterprise and employment	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.
CE: Community & Education	To provide for civic, community and educational facilities	To facilitate the development of necessary community, health, religious, educational, social and civic infrastructure.
AOS: Active Open Space	To protect and enhance existing and provide for new active open space	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing active open spaces, formal exercise areas, sports grounds, playing pitches, courts and other games areas and to facilitate opportunities for the development of new high quality active recreational areas.
OS1: Open Space	To protect and enhance existing public open space and provide for recreational open space.	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available for a broad range of the public) that would reduce the opportunities for use by the wider public.
OS2: Natural Areas	To protect and enhance existing open, undeveloped lands.	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.
PU: Public Utility	To maintain lands providing services infrastructure	To allow for lands to be designated for public utilities such as waste water treatment plants, large ESB sub-stations, gasworks etc
T: Tourism	To provide for tourism related development	To provide for the sustainable development of tourism related structures, uses and infrastructure. To provide for the development of tourism facilities including accommodation of an excellent sustainable design and aesthetic quality. Tourism related office, civic and cultural and commercial development will be facilitated.
MU: Mixed Use	To provide for mixed use development	The nature of the mixed use development envisaged for any particular site is set out in the text of the LPF.
EX: Extractive Industry	To provide for extraction / quarrying and associated activities including processing of extracted materials and land restoration.	To facilitate the development of extraction/ quarrying, associated activities and land restoration

ZONING	OBJECTIVE	DESCRIPTION
WZ: Waterfront	To provide for the development and improvement of the waterfront zone, to facilitate the continuation and development of existing employment / maritime / port, residential, public utilities, and community / recreational uses and to promote and provide for new commercial, maritime, residential, tourism and other mixed-use development.	<p>To facilitate the continued and more intensive / efficient use of the existing employment, maritime and port uses;</p> <p>To maintain existing and support the development / improvement of high quality community, amenity, leisure and tourism uses;</p> <p>To facilitate commercial and retail uses at a scale that do not undermine the role of the existing Town Centre;</p> <p>To facilitate the provision of high quality new residential developments at appropriate high densities with excellent layout and design, well linked to the existing town centre, community facilities and water amenities.</p>

The box below gives typical appropriate uses for each zone type. The planning authority shall determine each proposal on its merits, and shall only permit the development of uses that enhance, complement, are ancillary to, or neutral to the zoning objective. Uses that are materially inconsistent with and detrimental to the zoning objective shall not be permitted.

Uses generally appropriate for **residential (RN / RE)** zoned areas include houses, apartments, residential open space, education, community facilities, retirement homes, nursing homes, childcare/crèche, health centres, guest house, bed and breakfast, places of public worship, home based economic activity, utility installations and ancillary development and other residential uses in accordance with the County Development Plan (CDP) and applicable Local Plan.

Uses generally appropriate for **town centre (TC)** include residential development, childcare / crèche, commercial, education retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP and applicable Local Plan.

Uses generally appropriate for **local shops and services (LSS)** include small scale retail, retail services, health, public house, guest houses, parking, residential development, childcare/crèche, commercial, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for local shops and services uses in accordance with the with the CDP and applicable Local Plan.

Uses generally appropriate for **employment (E)** zoned land include general and light industry, office uses, enterprise units, education, appropriate warehousing, petrol filling stations (as deemed appropriate), public transport depots, open space, including sports grounds, childcare / crèche, community facilities including community and sports centres, utility installations including ancillary supporting infrastructure and energy storage, and ancillary developments for employment and industry uses in accordance with the CDP and applicable Local Plan.

Uses generally appropriate for **community and educational (CE)** zoned land include community, educational and institutional uses include burial grounds, places of worship, schools, training facilities, community hall, nursing homes, health related developments, sports and recreational facilities, utility installations and ancillary developments for community, educational and institutional uses in accordance with the CDP and applicable Local Plan.

Uses appropriate for **active open space (AOS)** zoned land are sport and active recreational uses including infrastructure and buildings associated with same. Education and community use may be considered appropriate in accordance with the objectives of the LPP.

Uses appropriate for **open space (OS1)** zoned land are recreational uses such as formal / informal landscaped parks with off-road walking / cycling paths, as well as playgrounds, skate parks, Mixed Use Games Areas, outdoor gyms, and allotments.

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.

Uses generally appropriate for **public utility (PU)** zoned land are for the provision of necessary infrastructure and services such as roads / footpaths / cycleways, carparks, train station, water and waste water treatment plants, large ESB sub-stations, gasworks.

Uses generally appropriate for **tourism (T)** zoned land are tourism accommodation and tourism / recreational uses such as Bed & Breakfast, cultural uses, holiday homes, hotels, recreational facilities.

Uses generally appropriate for any **mixed use (MU)** area will be specified in the applicable Local Plan.

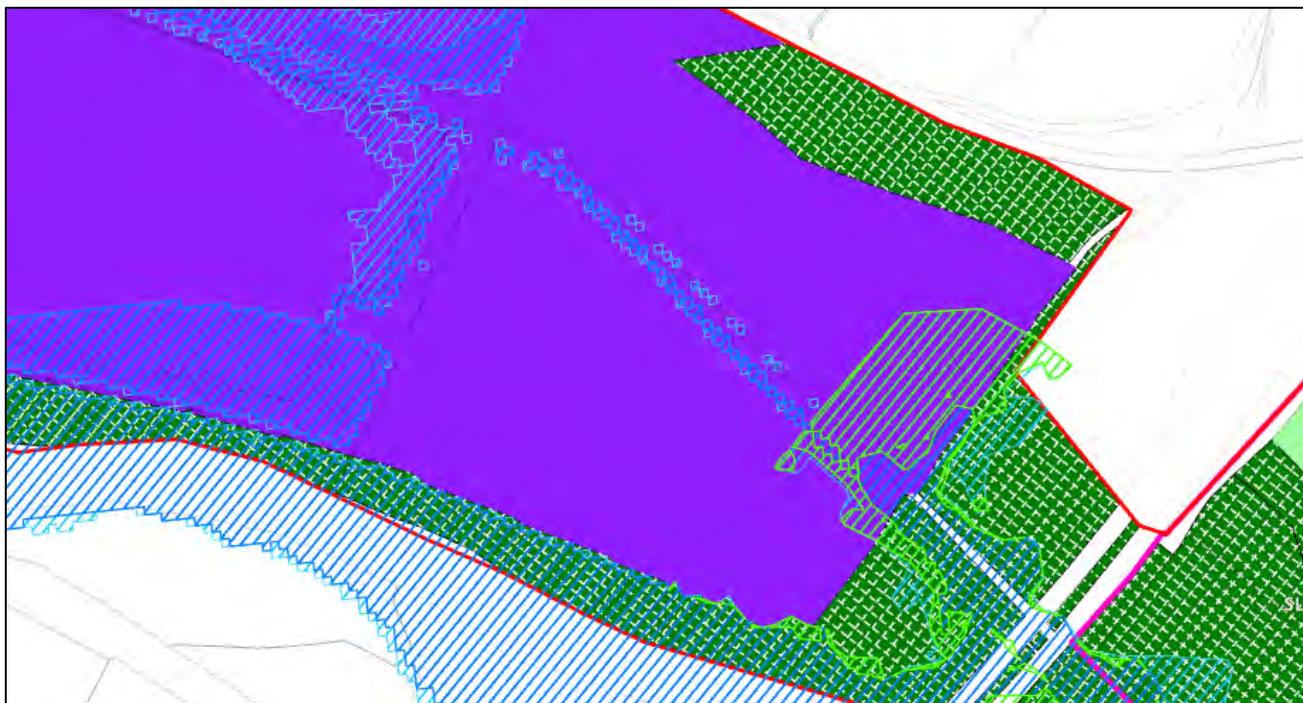
Uses generally appropriate for **extractive industry (EX)** zoned land are extractive industry uses (the winning of all minerals and substances in or under land of a kind ordinarily worked by underground or open cast mining), including value added production, such as concrete, asphalt and block production, and ancillary developments in accordance with the County Development Plan.

Uses generally appropriate for **waterfront (WZ)** zoned land include aquaculture / fishing, residential, childcare/crèche, civic / cultural uses, community facilities, education, employment / office uses, general and light industry, harbour uses, health related service / uses, hotels, maritime uses, recreational and leisure uses, retail, restaurants, parking, public house, tourism uses, utility installations and ancillary development in accordance with the CDP and the applicable Local Plan.

3.1 Additional Areas identified as being at current risk of flooding

The updated flood mapping identifies additional area at risk of flooding (Flood Zone A) as highlighted in hatched green below.

(i) West of M11



Additional areas identified in this area as being in Flood Zone A have the following draft zonings:

Land Use Zoning	OS2
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

Land Use Zoning	E
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.
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2	<p>The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:</p> <p>(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;</p> <p>(ii) Comprises significant previously developed and/or under-utilised lands;</p> <p>(iii) Is within or adjoining the core of an established or designated urban settlement;</p> <p>(iv) Will be essential in achieving compact and sustainable urban growth; and</p> <p>(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.</p>	<p>No</p> <p>Yes</p> <p>No</p> <p>No</p> <p>These lands are partially permitted for development.</p>
3	<p>A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere</p>	<p>Assessment of flood risk has been incorporated into the LPF SEA Process</p>

Conclusion

Justification Test failed.

Recommendation

The northern part of these lands are permitted for employment development. As such, it is considered appropriate to retain the E zoning objective.

The extent of Flood Zone A in the southern part of the lands is small in comparison to the overall site. The zoning objective for the future development of these sites does not prescribe exactly where in the zone development should occur and the zones are sufficiently large to provide for the development of desired uses while avoiding development in the at risk area.

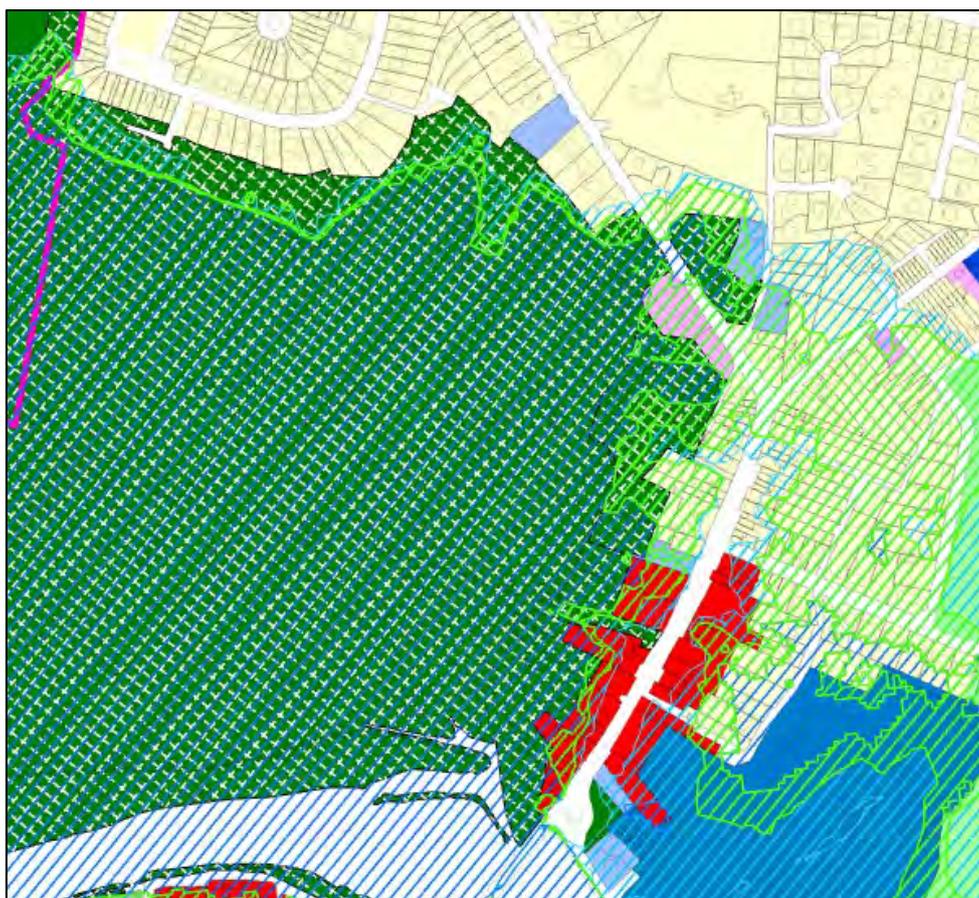
Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Chapter 5 of *'Planning System and Flood Risk Management Guidelines for Planning Authorities'* (DoEHLG/OPW 2009) and the relevant policies and objectives in the County Development Plan and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

(ii) North and West Arklow Town Marsh



Land Use Zoning	OS2
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

(iii) East Arklow Town Marsh/Ferrybank



Land Use Zoning	OS2
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

Land Use Zoning	RE
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	LSS
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	CE
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	TC
Flood Zone	A

Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	TC Zoned Sites: Yes All other sites: No
	(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
	(iii) Is within or adjoining the core of an established or designated urban settlement;	TC Zoned Sites & Adjoining CE Sites: Yes All other sites: No
	(iv) Will be essential in achieving compact and sustainable urban growth; and	No
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These lands are already developed
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere	Assessment of flood risk has been incorporated into the LPF SEA Process

Conclusion

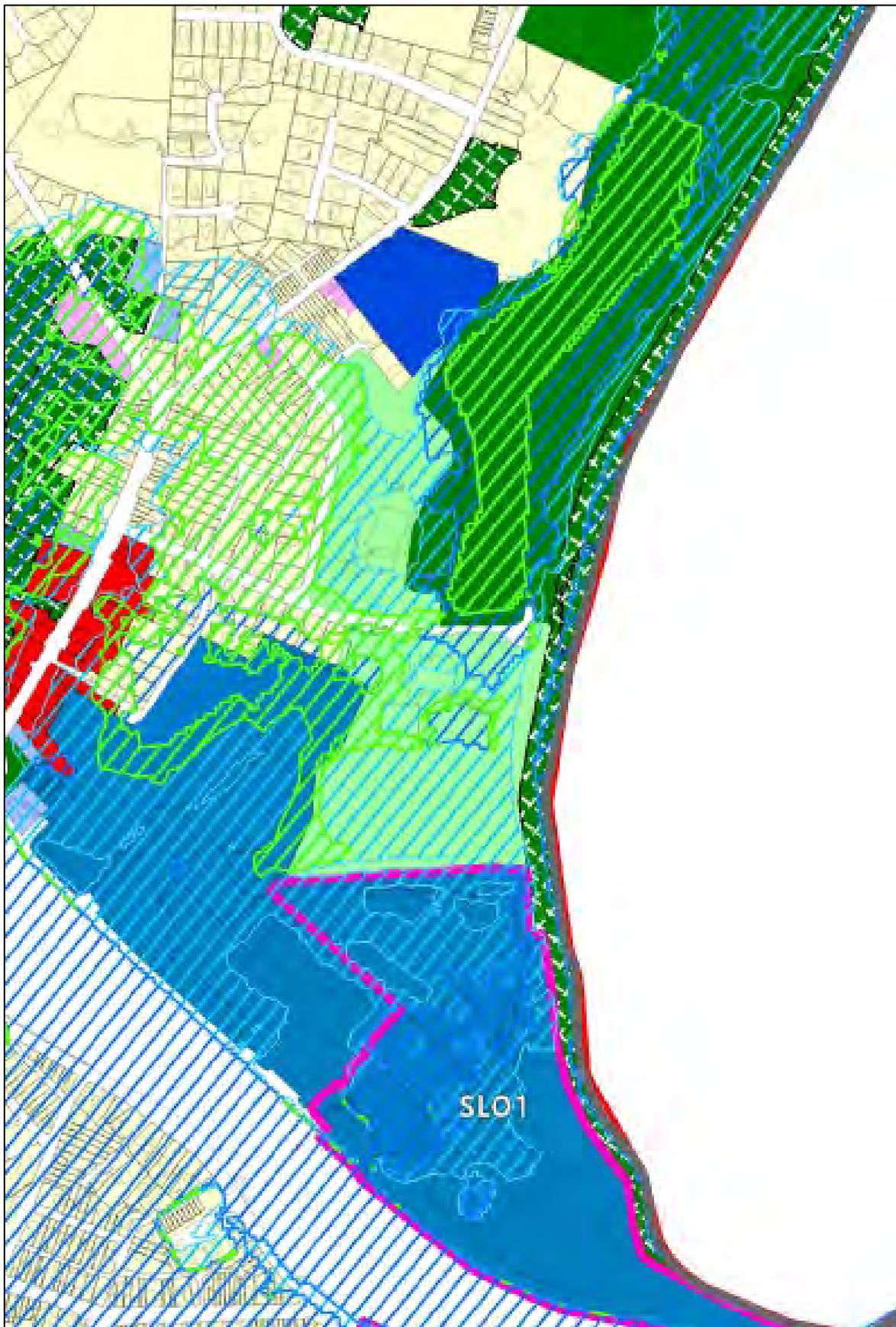
Justification Test failed.

Recommendation

These lands are already developed for uses reflected by the land use zonings on the lands. On this basis, the retention of the various zonings is considered justified.

Any proposals for new development/infill development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Chapter 5 of *Planning System and Flood Risk Management Guidelines for Planning Authorities* (DoEHLG/OPW 2009) and the relevant policies and objectives in the County Development Plan and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

(iv) Kynoch Park (east of Seaview Avenue) & North Waterfront



Land Use Zoning	OS1 (Note that a larger additional area of flood risk within this zone represents an existing waterbody/pond)
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

Land Use Zoning	AOS
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate (noting discussion in draft SFRA in relation to possible education/community development within this zone)
Requirement for Justification Test	No

Land Use Zoning	RE
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	T
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	WZ
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	WZ Sites: Yes All other sites: No
	(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
	(iii) Is within or adjoining the core of an established or designated urban settlement;	WZ Sites: Yes All Other Sites: No
	(iv) Will be essential in achieving compact and sustainable urban growth; and	WZ Sites: Yes All other sites: No

	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These lands are already developed
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere	Assessment of flood risk has been incorporated into the LPP SEA Process

Conclusion

WZ zoned sites: Justification Test satisfied.

All other sites: Justification Test failed.

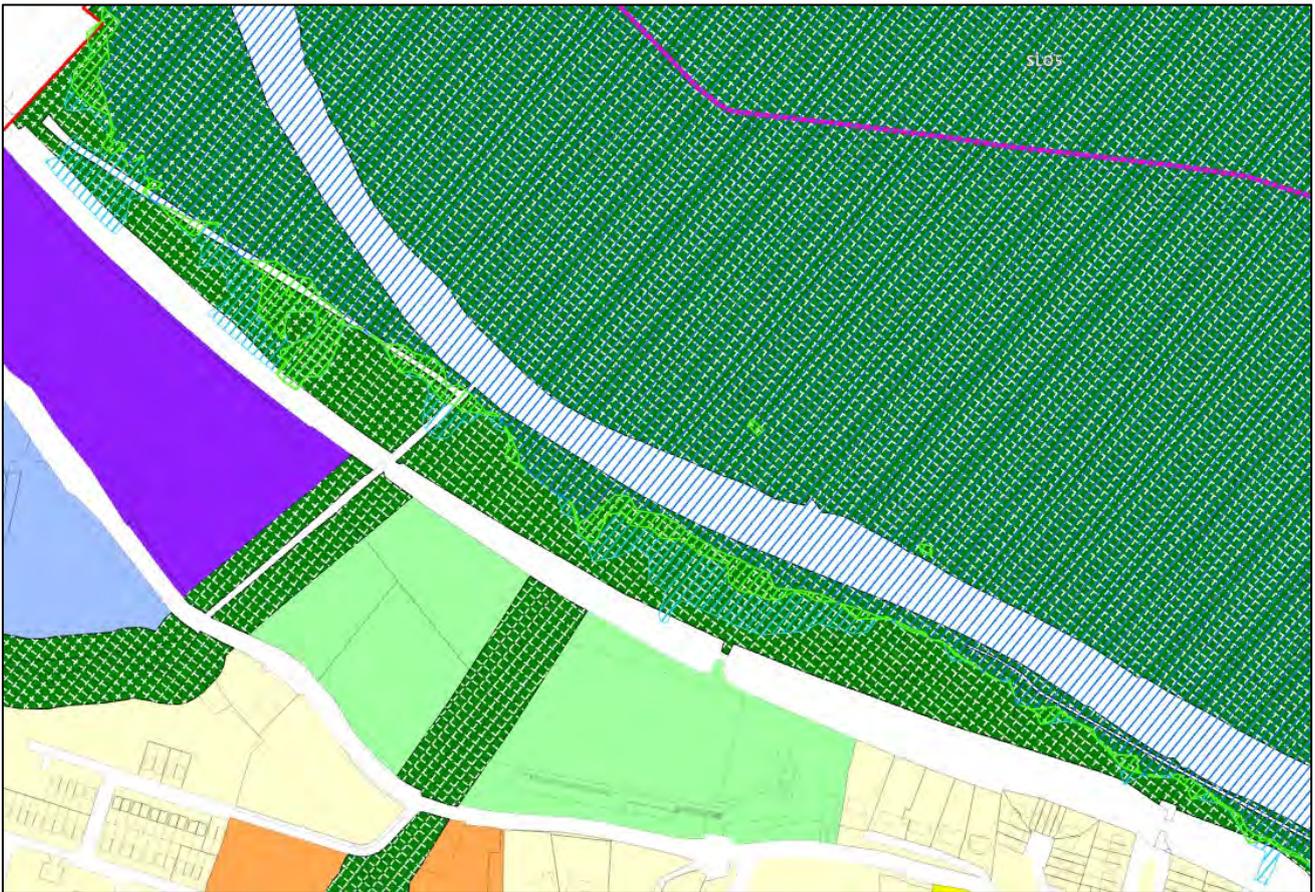
Recommendation

These lands are already developed for uses reflected by the land use zonings on the lands. On this basis, the retention of the various zonings is considered justified.

Note that the CE recommends a zoning change in this location at 'Kynoch Lodge' just north of the Arklow Bay Hotel from RE 'Existing Residential' to T 'Tourism' and OS1 'Open Space' which better reflects the boundary of the flood zones.

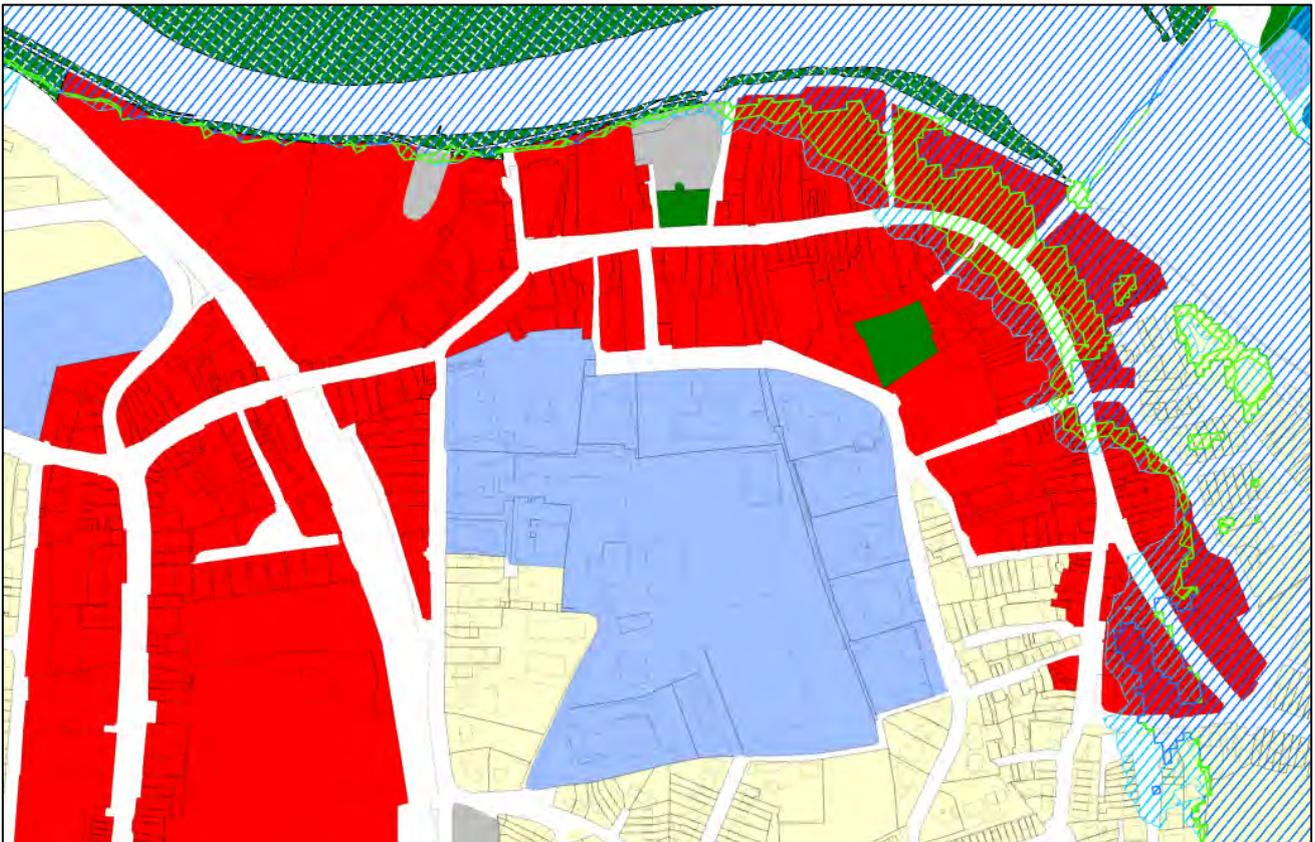
Any proposals for new development/infill development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Chapter 5 of '*Planning System and Flood Risk Management Guidelines for Planning Authorities*' (DoEHLG/OPW 2009) and the relevant policies and objectives in the County Development Plan and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

(v) South of Avoca River



Land Use Zoning	OS2
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

(vi) Arklow Main Street/Town Centre



Land Use Zoning	OS2
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning is appropriate
Requirement for Justification Test	No

Land Use Zoning	TC
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	PU
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	RE
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory	The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this
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	plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	TC Zoned Sites: Yes All other sites: No
	(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
	(iii) Is within or adjoining the core of an established or designated urban settlement;	TC Zoned Sites: Yes All other sites: No
	(iv) Will be essential in achieving compact and sustainable urban growth; and	TC Zoned Sites: Yes All other sites: No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These lands are already developed	
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere	Assessment of flood risk has been incorporated into the LPP SEA Process

Conclusion

TC Zoned sites: Justification Test satisfied

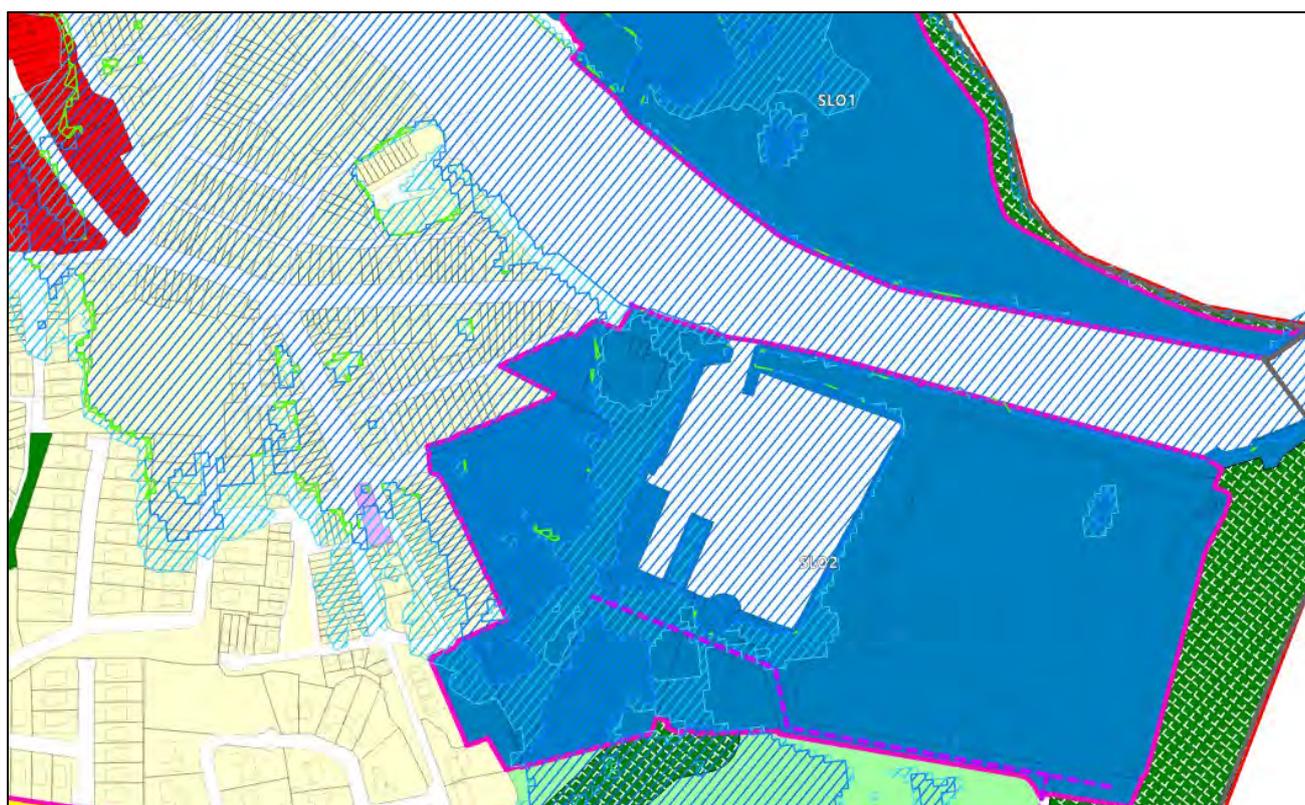
All other sites: Justification Test failed.

Recommendation

These lands are already developed for uses reflected by the land use zonings on the lands. On this basis, the retention of the various zonings is considered justified.

Any proposals for new development/infill development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Chapter 5 of *'Planning System and Flood Risk Management Guidelines for Planning Authorities'* (DoEHLG/OPW 2009) and the relevant policies and objectives in the County Development Plan and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

(vi) Harbour Road Area and South Waterfront



Land Use Zoning	RE
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	WZ
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Land Use Zoning	LSS
Flood Zone	A
Vulnerability of Land Use vs. Flood zone	Land use zoning not appropriate
Requirement for Justification Test	Yes

Plan-Making Justification Test

1	<p>The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.</p>	<p>The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.</p>
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2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	WZ Sites: Yes All other sites: No
	(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
	(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
	(iv) Will be essential in achieving compact and sustainable urban growth; and	WZ Sites: Yes All other sites: No
(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	These lands are already developed	
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere	Assessment of flood risk has been incorporated into the LPF SEA Process

Conclusion

WZ Zoned sites: Justification Test satisfied

All other sites: Justification Test failed.

Recommendation

These lands are already developed for uses reflected by the land use zonings on the lands. On this basis, the retention of the various zonings is considered justified.

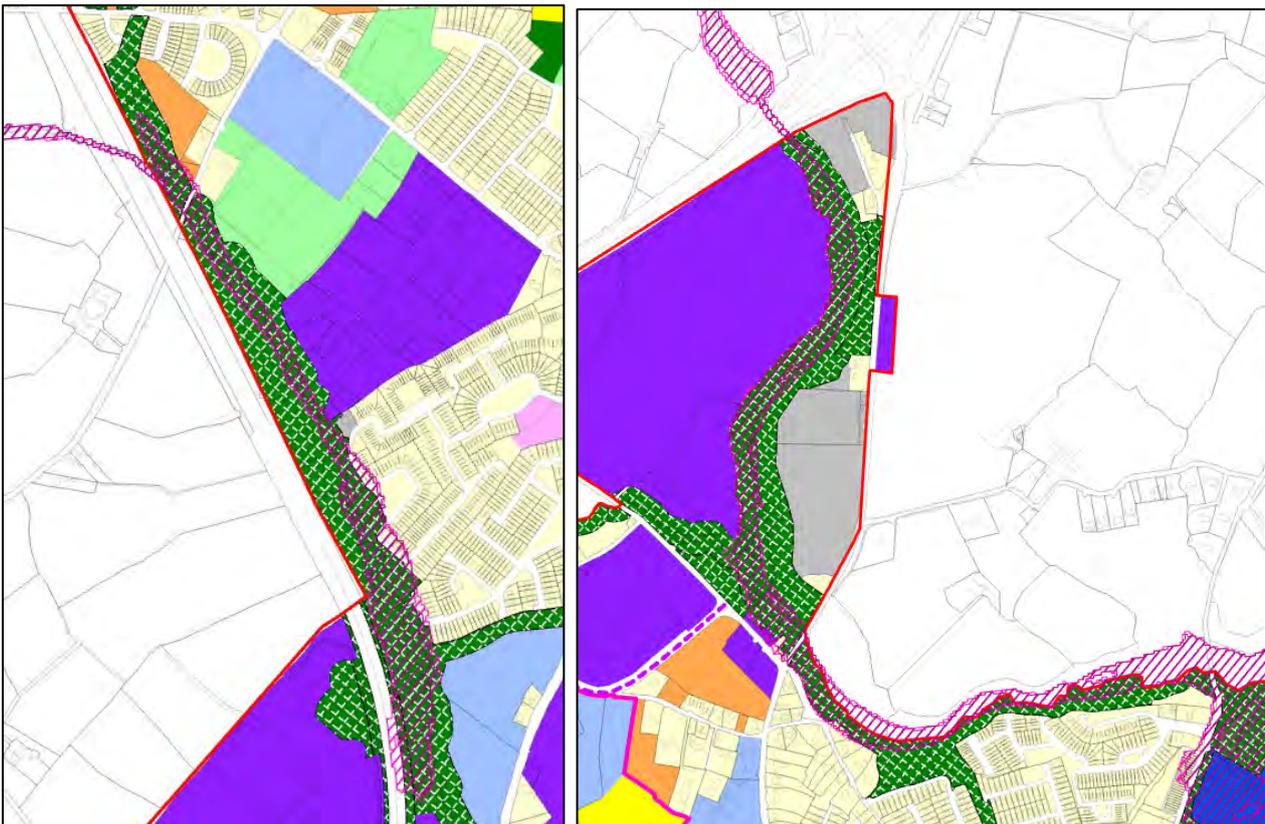
Any proposals for new development/infill development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Chapter 5 of *'Planning System and Flood Risk Management Guidelines for Planning Authorities'* (DoEHLG/OPW 2009) and the relevant policies and objectives in the County Development Plan and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

4 Updated Future Scenario Flood Mapping

Arising from the public consultation process, future scenario flood mapping has been updated to include future scenario flood risk derived from National Indicative Fluvial Mapping (NIFM). The areas at risk of flooding in the future are further demarcated into Flood Zones A & B. This updated future scenario flood mapping has been included on all relevant maps accompanying the LPF and appended to this addendum, namely:

- Map No. 4C Flood Risk – Potential Future Scenario (Update)
- Map No. 4D Flood Risk – Potential Future Scenario & Land Use Zoning (CE Recommendations)

The areas additionally identified as being potentially at risk of flooding in the future largely correspond to the paths of the Ballyduff and Templeraíne streams, as illustrated below. These areas of potential future flood risk are generally located on lands proposed to be zoned OS2 'Natural Areas' or on small areas of land zoned for other uses that are already developed. Very small areas of potential future flood risk extend into undeveloped E 'Employment' zoned land west of the Templeraíne stream, however this degree of flood risk could readily be addressed at development management stage, noting too that it is the **current** flood zones that provide the primary basis for zoning decisions/justification tests/etc. On the basis of the above, no changes to land use zonings are considered necessary.



Ballyduff stream potential future flood risk

Templeraíne stream potential future flood risk

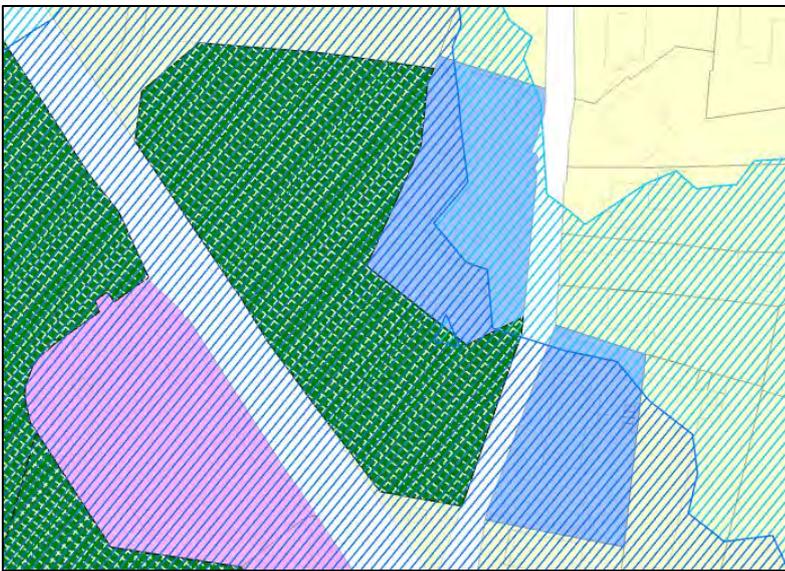
5 Update Justification Test for relevant sites CE 'Community & Education'

Arising from the public consultation process, WCC was made aware of a potential error in the SFRA published alongside the Draft LPF/Variation. It was noted that the CE 'Community & Education' zoning was possibly assessed as a 'less vulnerable' use rather than a 'highly vulnerable' use. This was in error. The assessment of CE zoned sites is repeated below (using updated flood mapping) on the basis of the zoning representing 'highly vulnerable' uses.

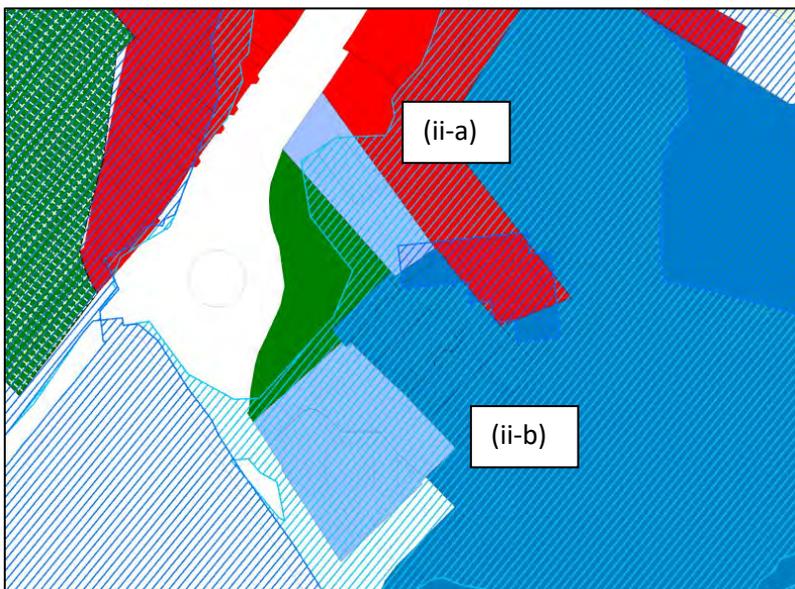
LAND USE ZONING: Community & Education (CE)

It has been determined that there are 3 no. locations within the LPF area proposed to be zoned 'CE – Community & Education' which are located within Flood Zones A and B.

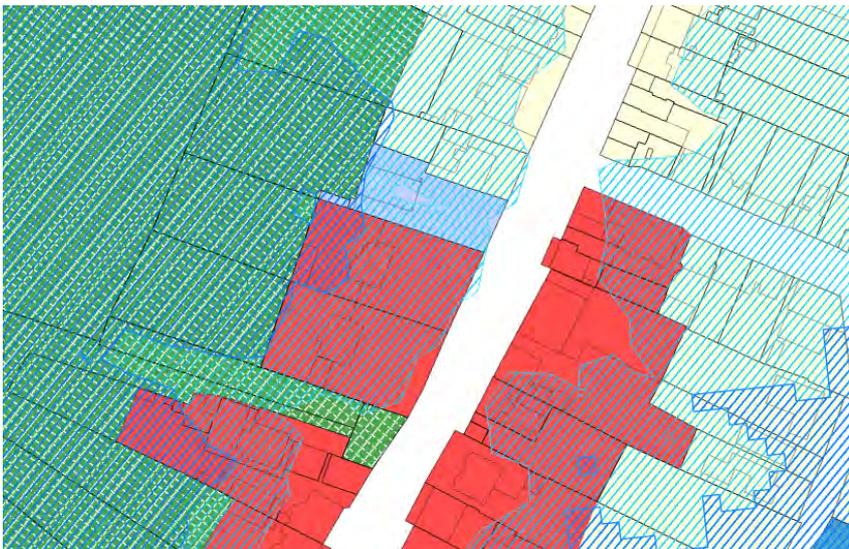
(i) Dublin Road /Brigg's Lane



(ii) Ferrybank/North Quay



(iii) **Ferrybank**



Land Use Zoning	CE
Flood Zone	Site (iii-b): Flood Zone B All other sites: Flood Zones A & B
Vulnerability of Land Use vs. Flood zone	All sites: Land use zoning not appropriate
Requirement for Justification Test	All sites: Yes

Plan-Making Justification Test		
1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.	The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:	
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement;	No
	(ii) Comprises significant previously developed and/or under-utilised lands;	Yes
	(iii) Is within or adjoining the core of an established or designated urban settlement;	Yes
	(iv) Will be essential in achieving compact and sustainable urban growth; and	Yes
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.	N/A – these lands are developed
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan	Assessment of flood risk has been incorporated into the LPF SEA Process

preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere.

Conclusion

Justification Test failed

Recommendation

Site (i) is currently developed as a permitted education centre (on both sides of the road).
Site (ii-a) is currently developed as a Masonic Lodge with permitted pre-school use.
Site (ii-b) is currently developed as an office building that includes some health-related facilities.
Site (iii) is a Methodist Church, which serves as a pre-school Montessori.

Highly vulnerable developments in Flood Zone A or B require a justification test to be carried out. However, these lands are currently developed for permitted CE use. As such, it is considered appropriate to retain the CE zoning objective.

Applications for new, infill type or minor development will be evaluated in accordance with Chapter 5 of *'Planning System and Flood Risk Management Guidelines for Planning Authorities'* (DoEHLG/OPW 2009) and the flood risk management objectives of the Wicklow County Development Plan and the Arklow LPF. Should expansion of existing uses be proposed, flood mitigation measures are required (see Section 5 Mitigation Objectives).

6 Assessment of CE's Recommended Alterations

The purpose of this assessment is to identify and evaluate any locations recommended by the CE for new zoning or zoning changes that may be located in flood risk zones.

The following Recommended Alterations relate to zoning changes:

Recommended Alteration No.	Recommended land use zoning change	Flood Zone	Requirement for Justification Test
19	RE - T	C	N
	RE - OS1	A + B	N
20	OS2 - E	C	N
	Unzoned - E	A + B	Y
21	OS2 - RN2	C	N
	RN2 - OS2	A + B	N
22	OS2 - E	C	N

The following zoning objectives relate to the above recommended alterations:

ZONING	OBJECTIVE	DESCRIPTION
RE: Existing Residential	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.
RN2 New residential Priority 2	To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement in accordance with the objectives set out in the LPF.	To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.
E: Employment	To provide for the development of enterprise and employment	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.
OS1: Open Space	To protect and enhance existing public open space and provide for recreational open space.	Subject to the protection and enhancement of natural biodiversity, to facilitate the further development and improvement of existing parks and casual play areas, to facilitate opportunities for the development of new high quality amenity open areas and to restrict developments / activities (such as the use or development of such lands for formal sports grounds for organisations that are not available

ZONING	OBJECTIVE	DESCRIPTION
		for a broad range of the public) that would reduce the opportunities for use by the wider public.
OS2: Natural Areas	To protect and enhance existing open, undeveloped lands.	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.
T: Tourism	To provide for tourism related development	To provide for the sustainable development of tourism related structures, uses and infrastructure. To provide for the development of tourism facilities including accommodation of an excellent sustainable design and aesthetic quality. Tourism related office, civic and cultural and commercial development will be facilitated.

The following maps show the Recommended Alteration sites relevant to the location of the nearest present day Flood Zones A and B.

Map key:



Flood Zone A (updated)



Flood Zone B (updated)



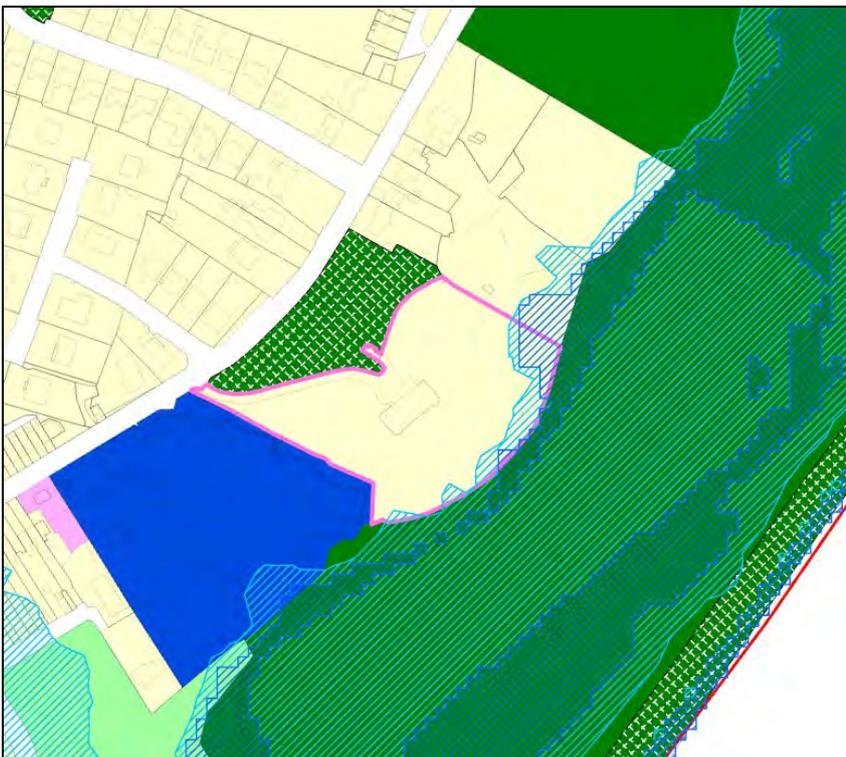
Site boundary of Recommended Alteration

Recommended Alteration No. 19

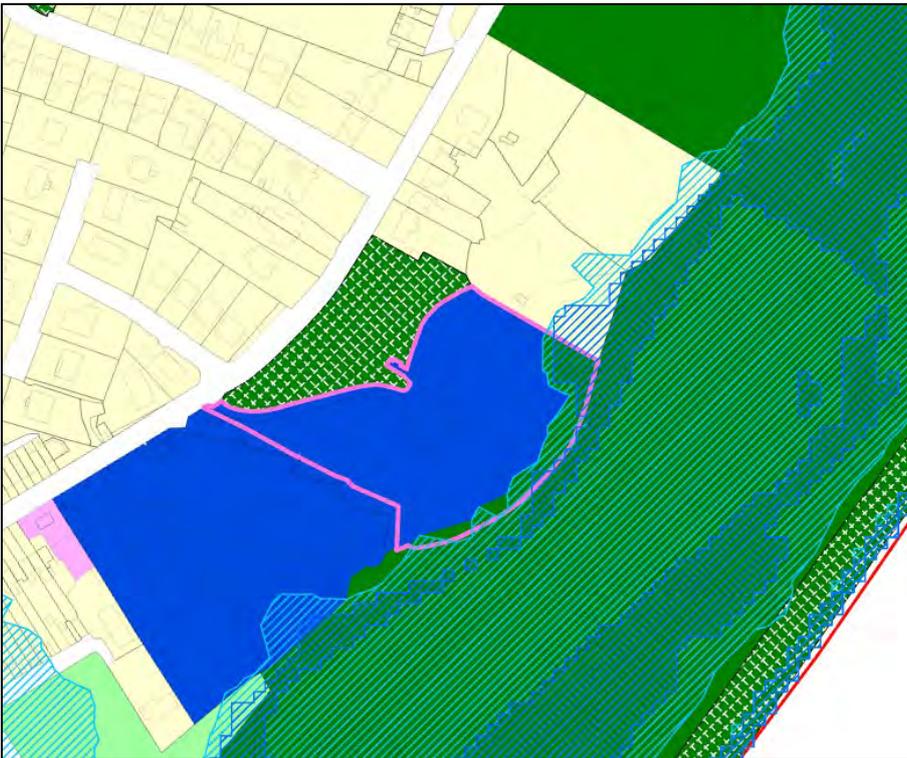
Change from:



With flood zones overlaid



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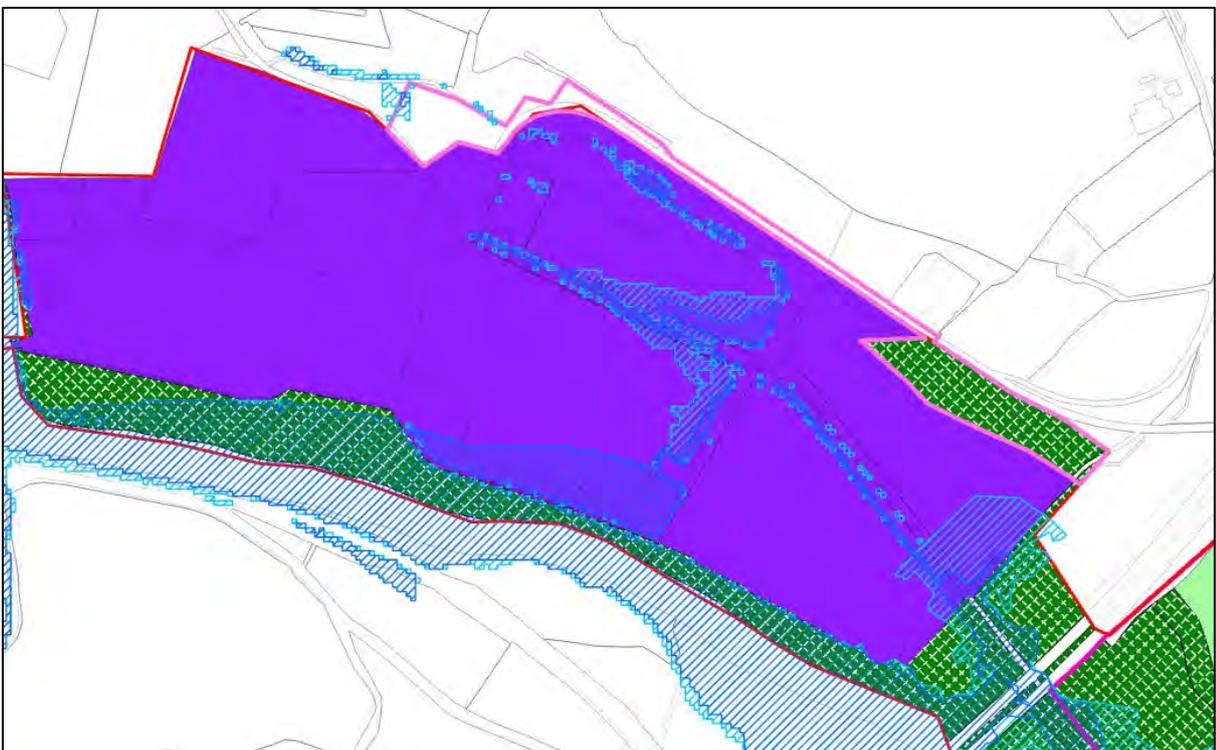


Recommended Alteration No. 20

Change from:



With flood zones overlaid



Change to:



Land Use Zoning	E – Employment Less Vulnerable Use
Flood Zone	A + B (north-western portion only)
Vulnerability of Land Use vs. Flood zone	Land use zoning 'not appropriate' in Flood Zone A only Land use zoning 'appropriate' in Flood Zone B
Requirement for Justification Test	Yes (north-western portion only located in Flood Zone A)

Plan-Making Justification Test	
1	The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
	The Settlement Strategy of the Wicklow County Development Plan 2022-2028 designates Arklow as a 'Level 3 Self-Sustaining Growth Town' and identifies this settlement typology as being identified for a growth rate of c. 25-30%. The Core Strategy of the Wicklow County Development Plan 2022-2028 sets out a population target of 15,419 by Q2 2028, from a 2016 population of 13,226 persons. The Core Strategy further indicates a total housing growth target of 1,221 units from 2016 to 2031.
2	The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
	(i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement; No
	(ii) Comprises significant previously developed and/or under-utilised lands; No
	(iii) Is within or adjoining the core of an established or designated urban settlement; No
	(iv) Will be essential in achieving compact and sustainable urban growth; and No
	(v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement. Yes
3	A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impacts elsewhere
	Assessment of flood risk has been incorporated into the LPF SEA Process

Conclusion

Justification Test failed.

Recommendation

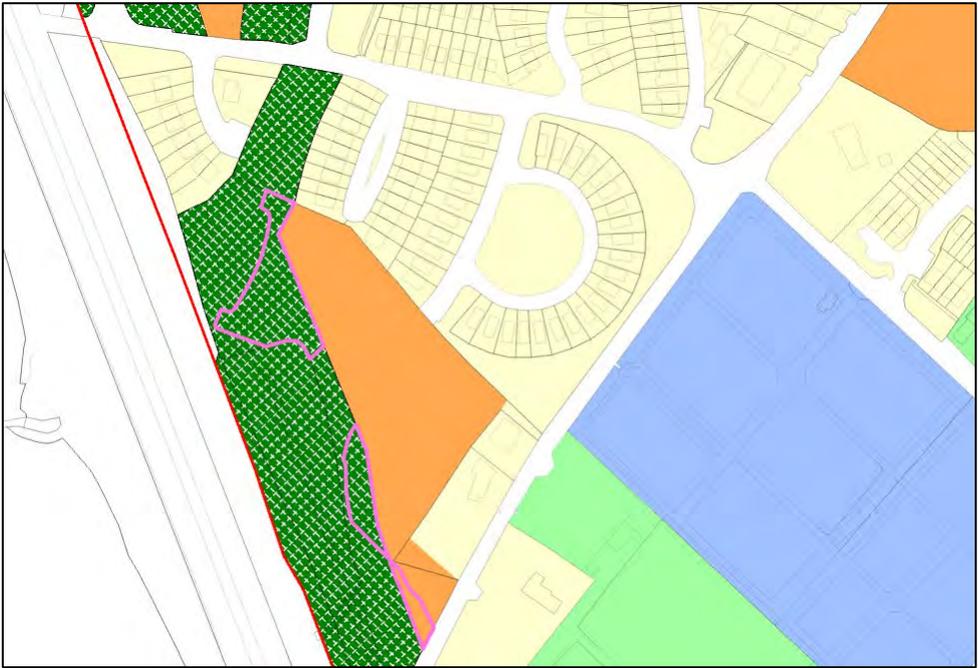
The extent of Flood Zone A in the northwestern portion of these lands is extremely small in comparison to the overall site. The zoning objective for the future development of this large Employment site does not prescribe exactly where in the zone development should occur and the zone is sufficiently large to provide for the development of desired uses while avoiding development in the at risk area.

Any proposals for new development should be accompanied by an appropriately detailed FRA, undertaken in accordance with Chapter 5 of 'Planning System and Flood Risk Management Guidelines for Planning

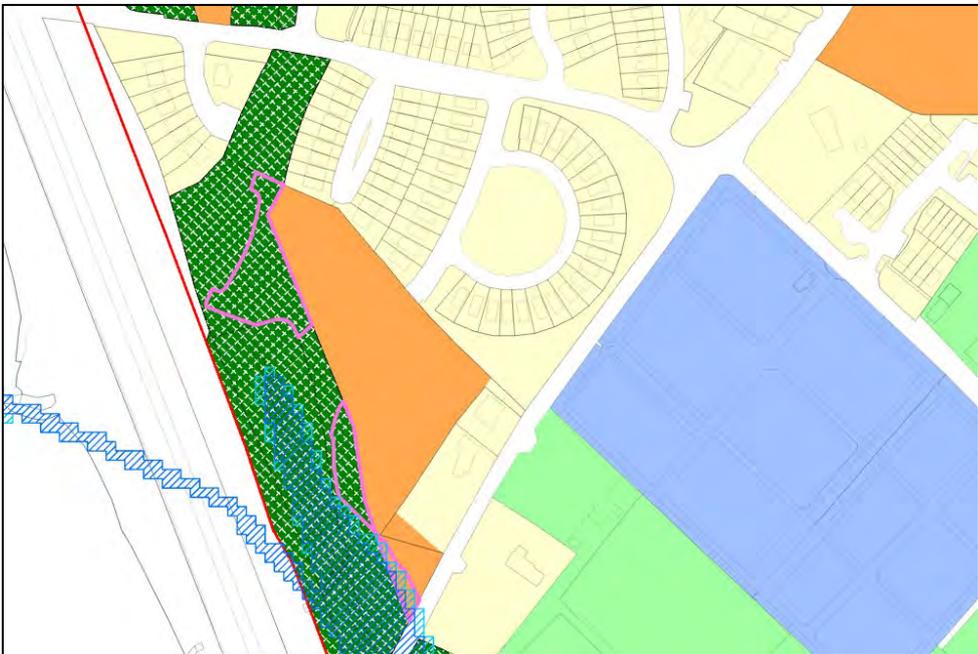
Authorities' (DoEHLG/OPW 2009) and the relevant policies and objectives in the County Development Plan and in particular, the sequential approach shall be applied in the site planning, to ensure no encroachment onto, or loss of the flood plain, or that only water compatible development such as Open Space will be permitted for the lands which are identified as being at risk of flooding within that site.

Recommended Alteration No. 21

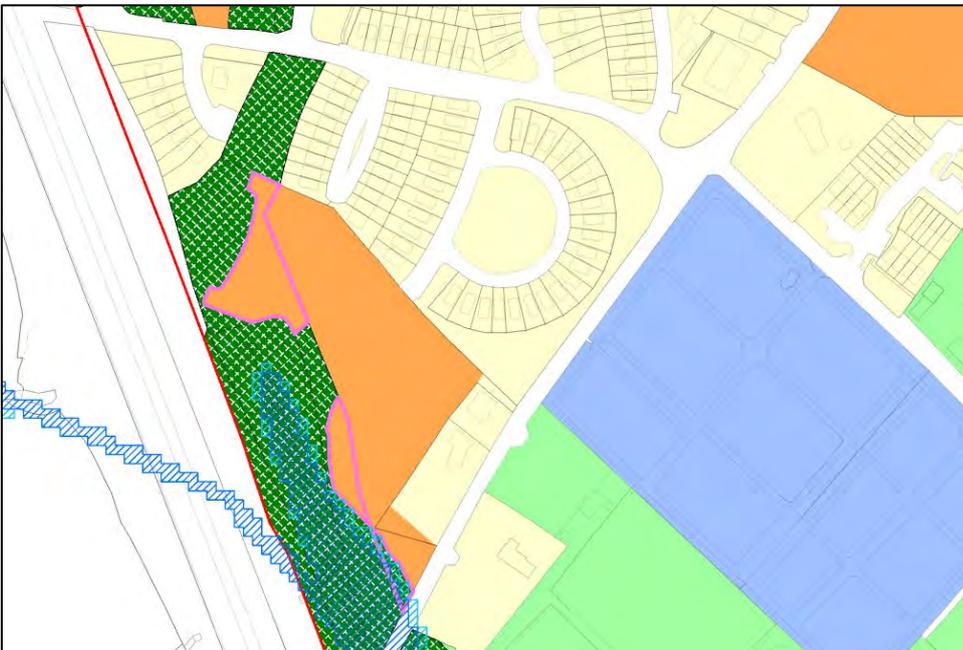
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With flood zones overlaid

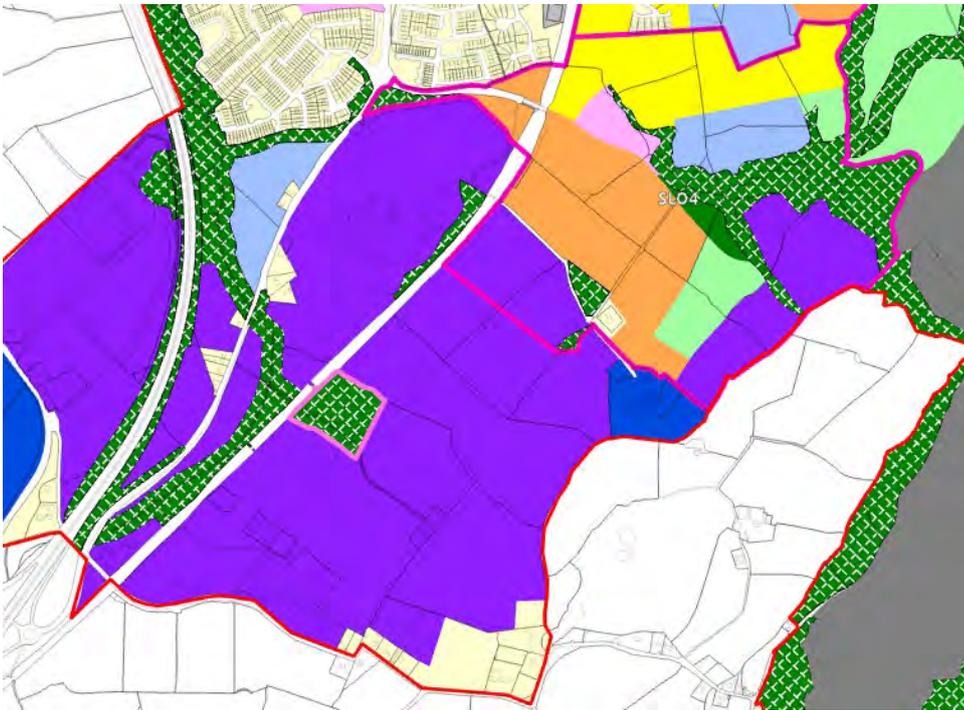


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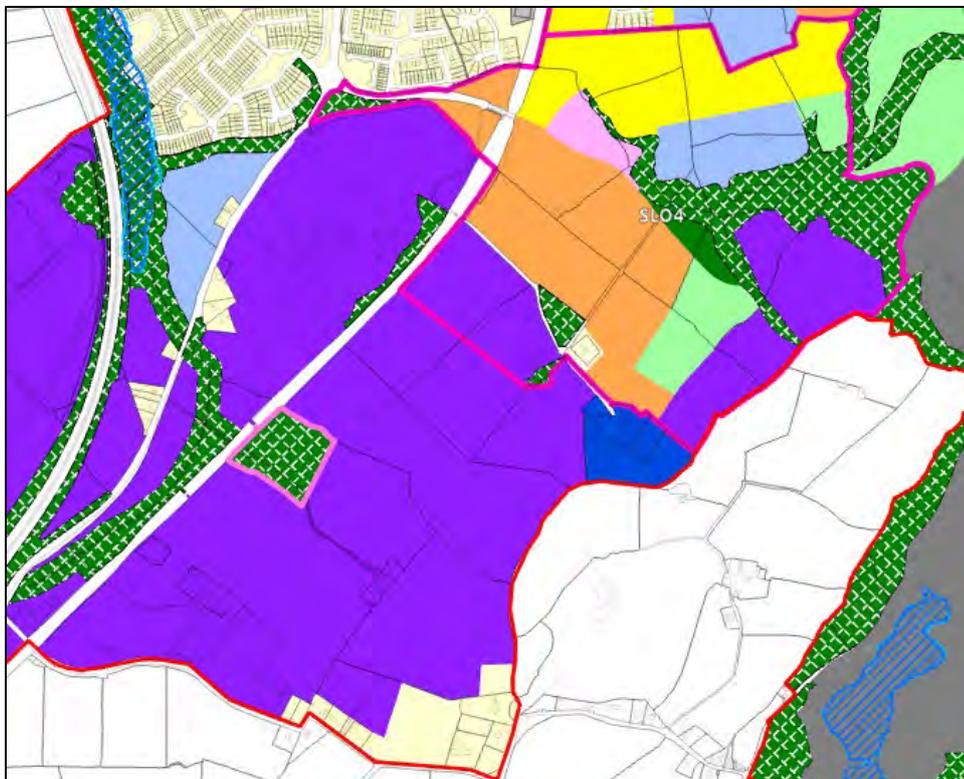


Recommended Alteration No. 22

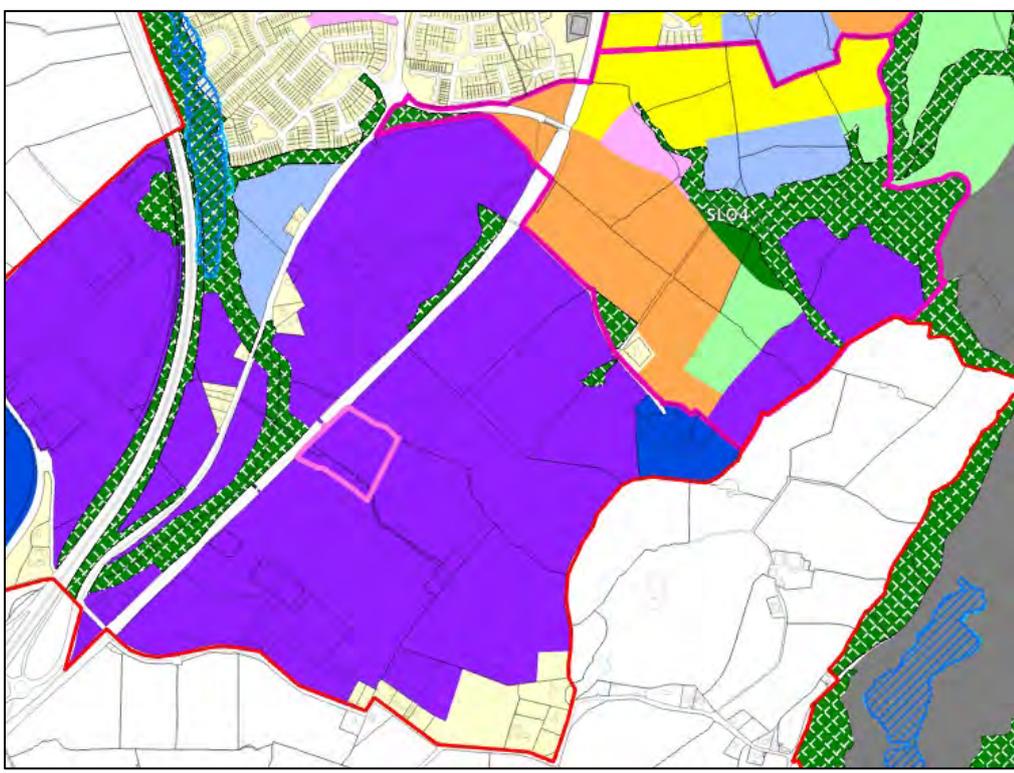
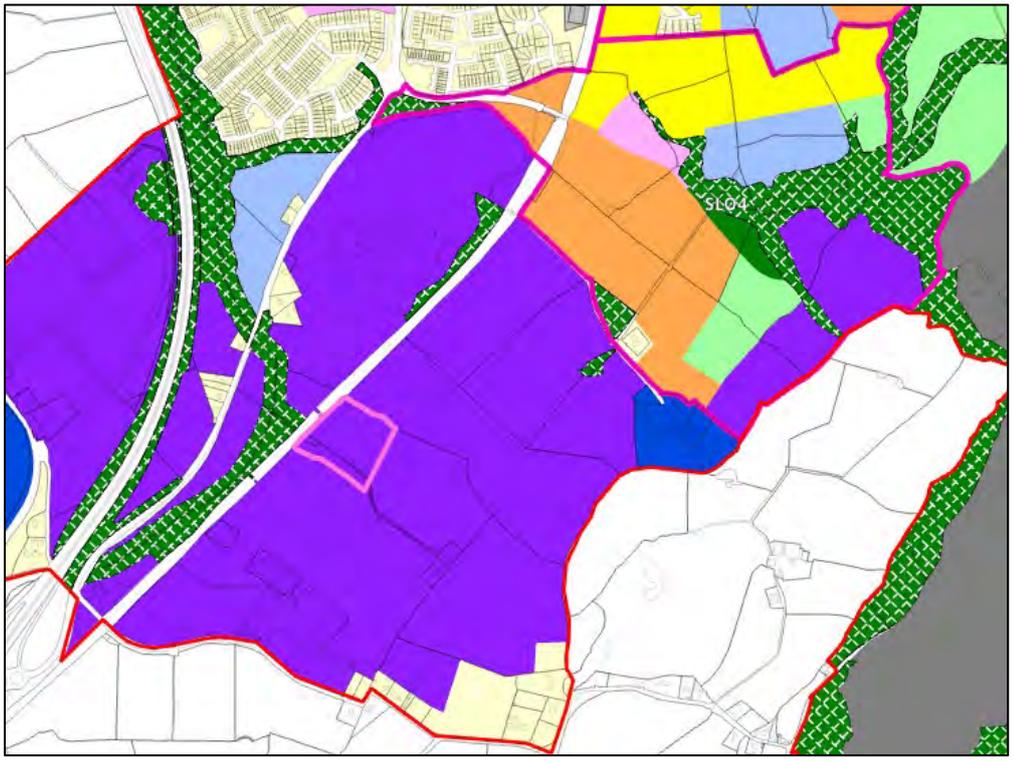
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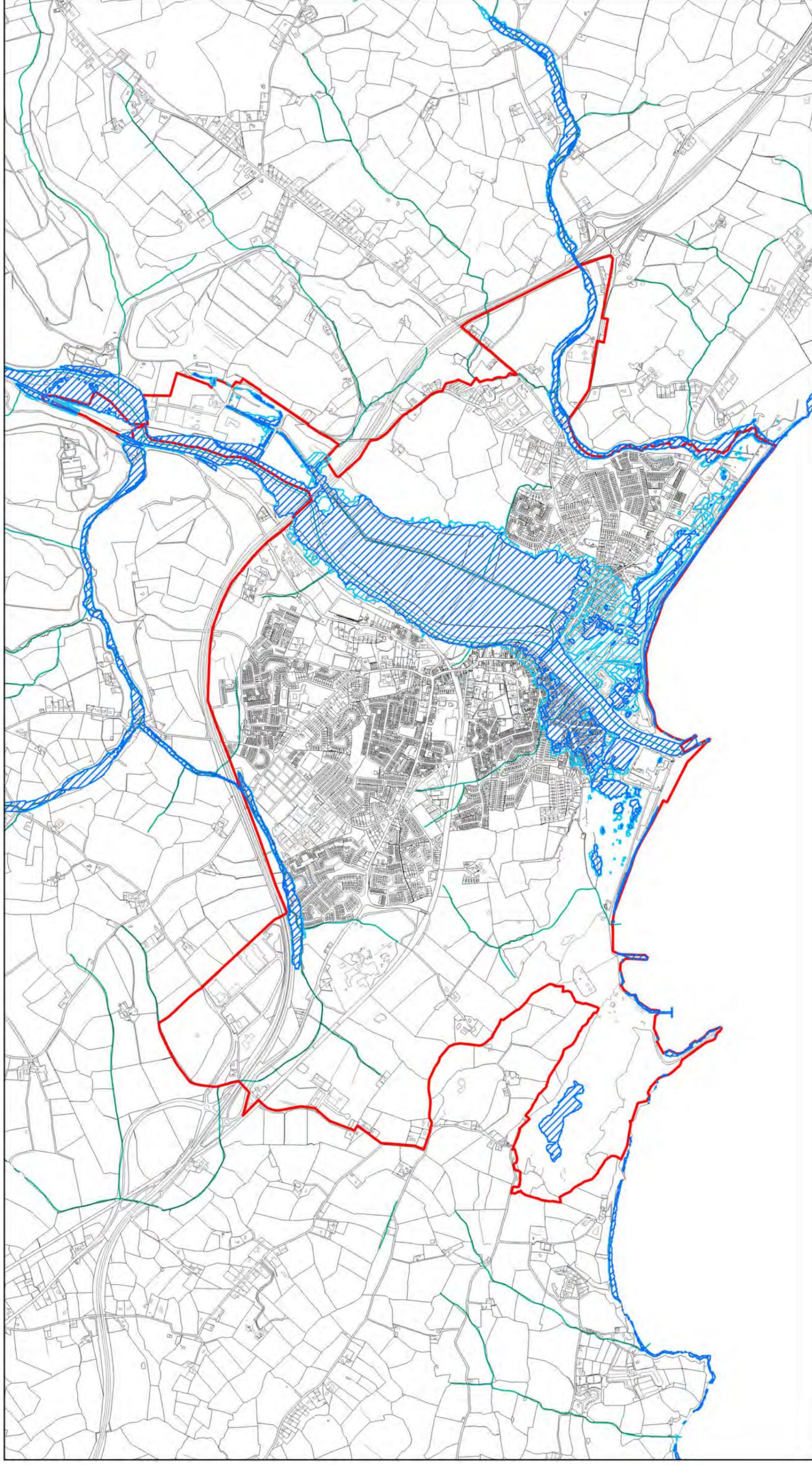


Change to:



Conclusion

No further stages of assessment are required with respect to the Chief Executive Recommended Alterations.



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**Arklow
Local Planning Framework
2026**

**Map No. 4A
Flood Risk - Present Day
(Update)**



LEGEND

Arklow LPF Boundary (as recommended)

Watercourses

**Flood Zone A: High
Probability of Flooding (as updated)**

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

**Flood Zone B: Moderate
Probability of Flooding (as updated)**

Where 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)

Disclaimer

These indicative flood zones were based on information available at the time of drafting this plan. Any new data and analysis carried out after this date has not been integrated into this map but should be used in conjunction with this map for development proposals. All information may be substantially altered in light of future data and analysis.

Full Disclaimer is included in SFRA.

**WICKLOW COUNTY
DEVELOPMENT PLAN
2022-2028**



Wicklow County Council
Planning Department

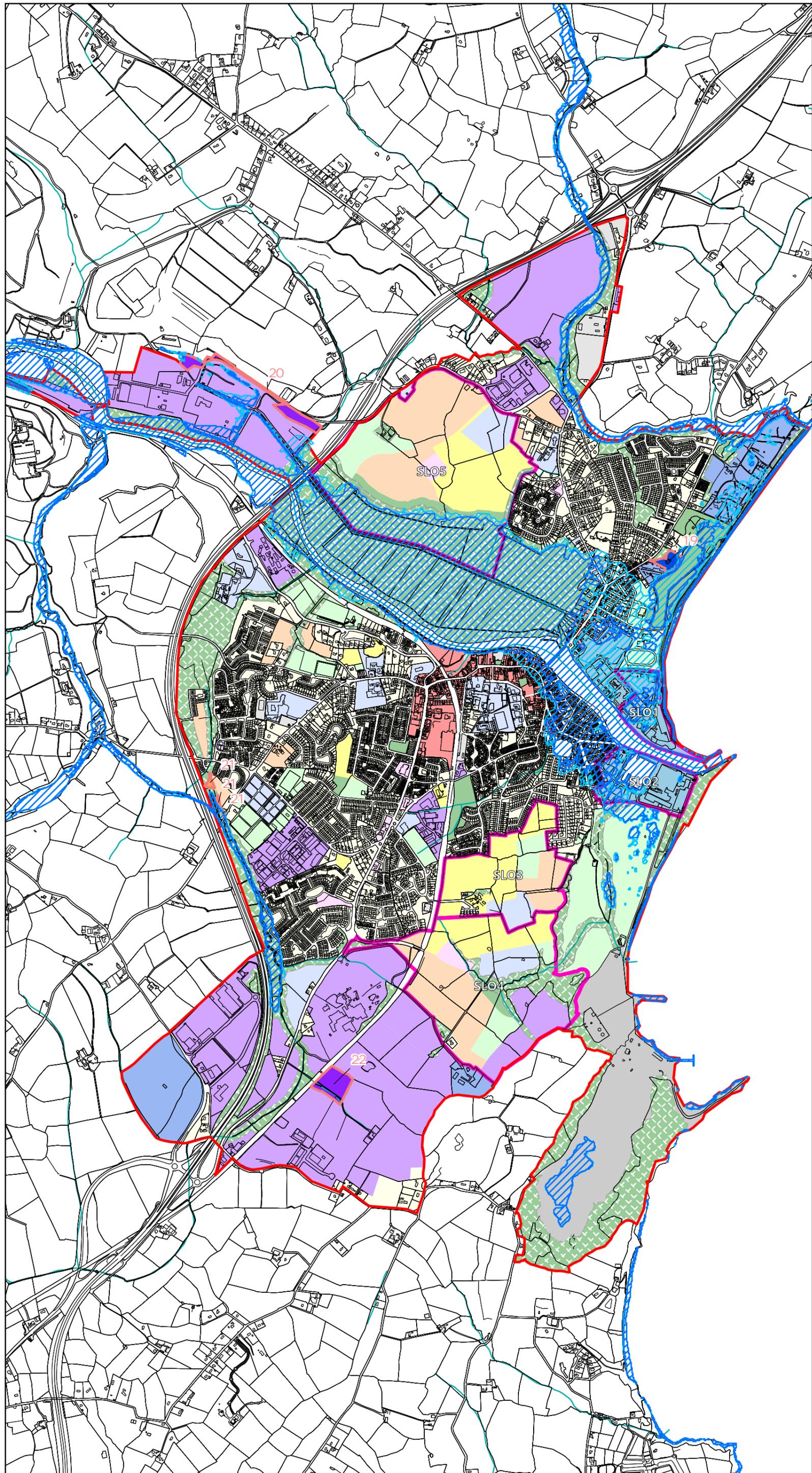
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Scale NTS

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**Arklow
Local Planning Framework
2026**

**Map No. 4B
Flood Risk - Present Day &
Land Use Zoning (CE
Recommendations)**



LEGEND

- Arklow LPF Boundary (as recommended)
- Specific Local Objective (as recommended)
- CE Recommended
- Alterations to Land Use Zoning
- Flood Zone A: High
- Probability of Flooding (as updated)
- Flood Zone B: Moderate
- Probability of Flooding (as updated)
- Watercourses
- RN (1)
- RN (2)
- RE
- TC
- LSS
- PU
- CE
- T
- WZ
- AOS
- OS1
- OS2
- E1
- EX

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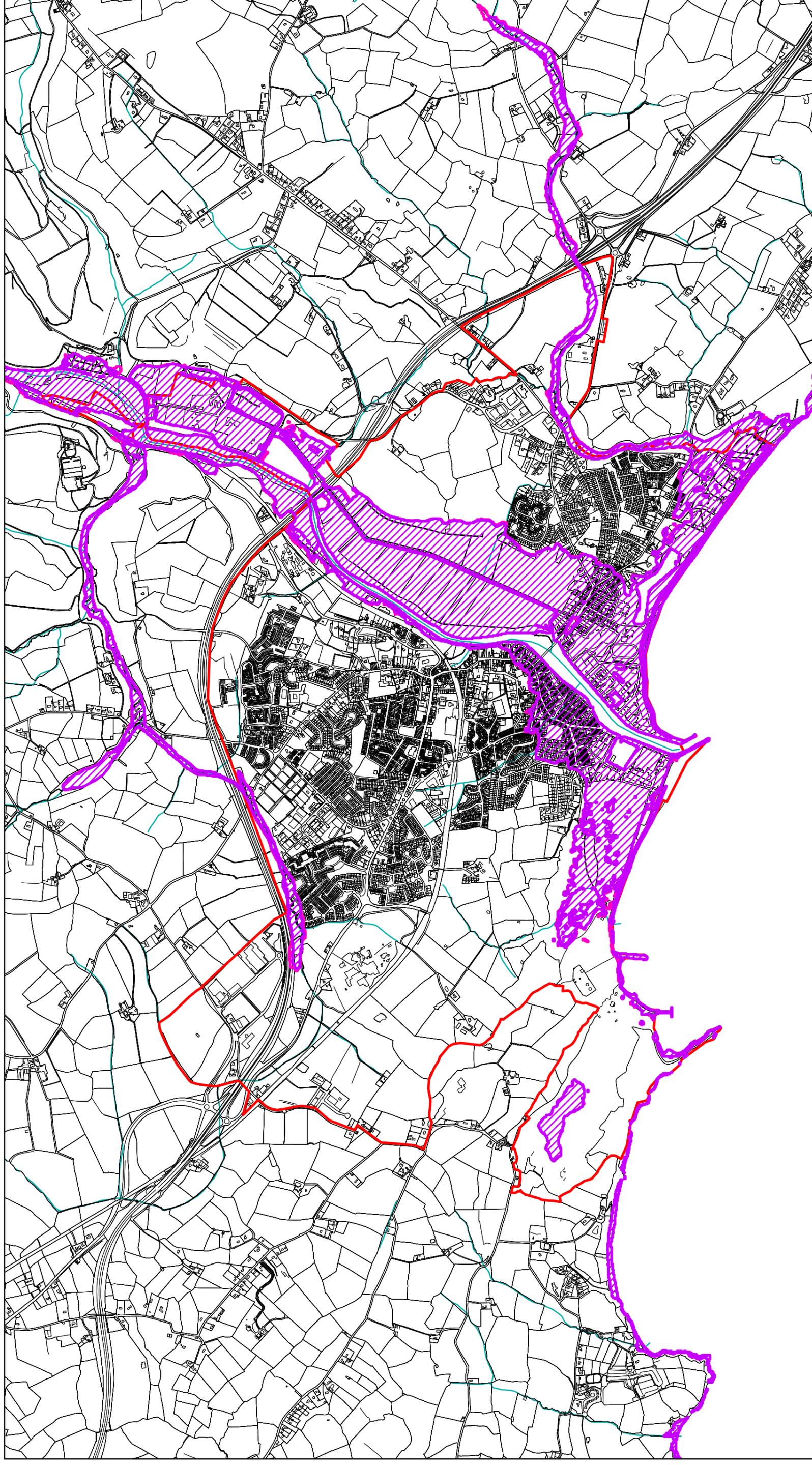
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**Arklow
Local Planning Framework
2026**

**Map No. 4C
Flood Risk - Potential Future
Scenario (Update)**



LEGEND

-  Arklow LPF Boundary (as recommended)
-  Watercourses
-  Area of Potential Future Flood Risk - Flood Zone A (as updated)

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

-  Area of Potential Future Flood Risk - Flood Zone B (as updated)
- Where 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)

Future scenario flood mapping is as set out under the CFRAM 'High End' Future Scenario, NIFM 'High End' Future Scenario, and the NCFHM 'High ++' future scenario. For more information, refer to the Arklow Local Planning Framework Strategic Flood Risk Assessment and any accompanying addenda

Disclaimer

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DEVELOPMENT PLAN
2022-2028**



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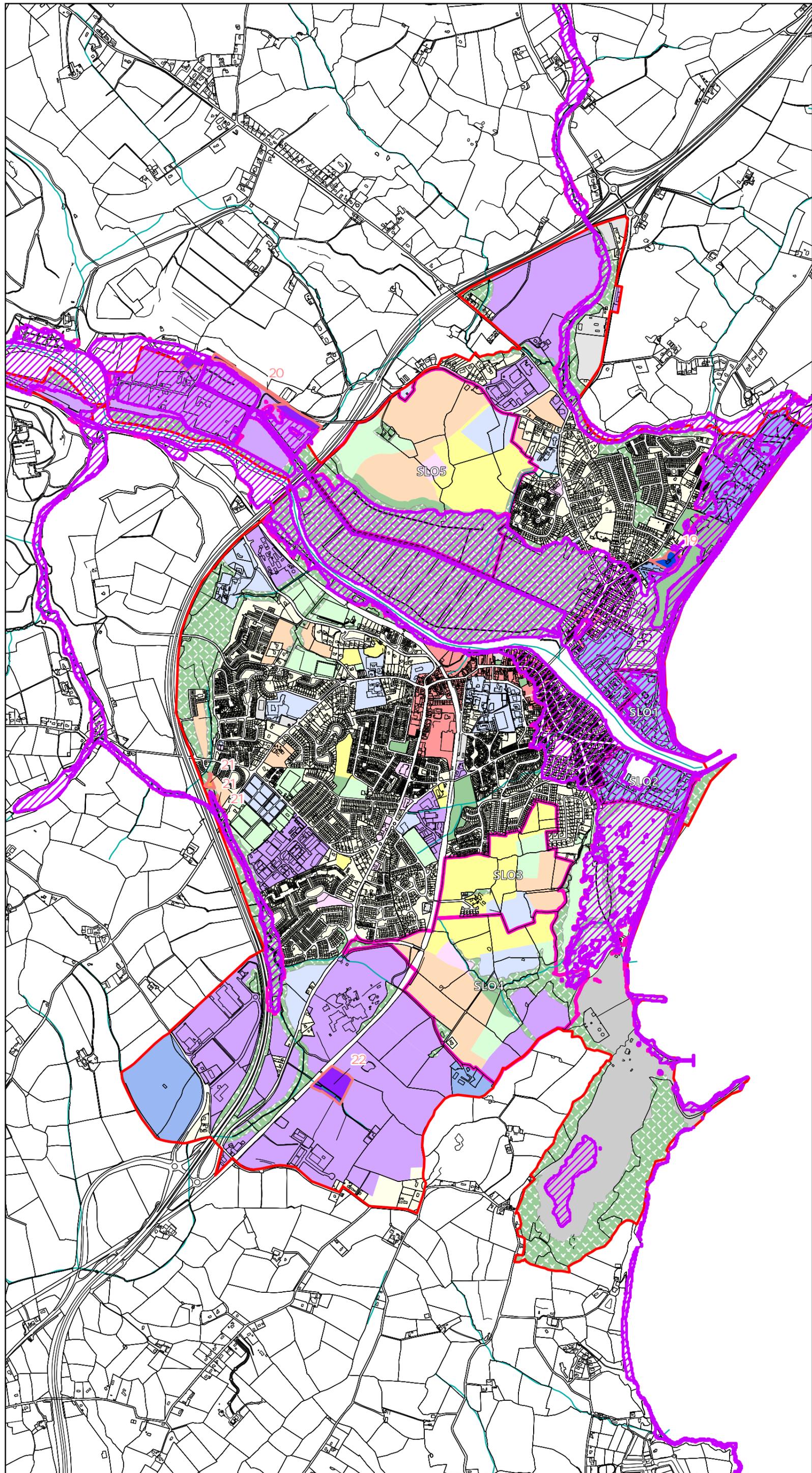
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**Arklow
Local Planning Framework
2026**

**Map No. 4D
Flood Risk - Potential Future
Scenario & Land Use Zoning
(CE Recommendations)**



LEGEND

-  Arklow LPF Boundary (as recommended)
-  Specific Local Objective (as recommended)
-  CE Recommended
-  Alterations to Land Use Zoning
-  Area of Potential Future Flood Risk - Flood Zone A (as updated)
-  Area of Potential Future Flood Risk - Flood Zone B (as updated)
-  Watercourses
-  RN(1)
-  RN(2)
-  RE
-  TC
-  LSS
-  PU
-  CE
-  T
-  WZ
-  AOS
-  OS1
-  OS2
-  E1
-  EX

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2022-2028**



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