

Wicklow County Council and the Office of Public Works

Arklow Flood Relief Scheme

**Response to submission on CPO Application to
ABP re “Contravention of County Development
Plan/Arklow and Environs Local Area Plan 2018-
2024”**

An Bord Pleanála reference ABP – 310377-21

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Response to submission on CPO Application to ABP re “Contravention of County Development Plan/Arklow and Environs Local Area Plan 2018- 2024”

Overview

One of the CPO submissions (Peir Leonard, plot 120k) made a submission to An Bord Pleanála (ABP) in respect of the proposed Arklow Flood Relief Scheme. This submission includes observations relating to the Arklow and Environs Local Area Plan 2018 – 2024. These are individually addressed below.

Arklow and Environs LAP “SUPPORTING THE MARITIME SECTOR”

The LAP states: *The maritime sector in Arklow benefits from a host of assets and activities capable of expansion and development including: shore-side services, shipping services, repair and maintenance, fishing, tourism and leisure, servicing of the off-shore renewable energy industry, maritime financial services etc. Wicklow County Council supports the identification and realisation of the economic opportunities within this sector.*

The objector comments that the proposals are in contravention of this objective of the LAP as the Scheme will restrict access to the waterside area.

Response:

Wicklow County Council is satisfied that the Scheme does not restrict the development of Maritime activities. One developer has applied for permission at the Dock area, taking into account the proposed Flood Relief Scheme. (PRR 211316 Sure Partners). This application is for the construction of an Operations and Maintenance base for the Offshore Wind Development at Arklow Wind Park. This application would not have been made, if the Scheme were perceived to restrict access to the waterside. In fact, if the Scheme is approved, the certainty around Flood Risk Management will allow further development to occur.

The proposed Scheme will incorporate an improved access to the river (including pontoon) at River Walk (beside St Mary’s Car Park). While the Scheme does restrict access

where the Flood Defence Walls are constructed, access to the river is maintained at the Dock area as well as River Walk.

Furthermore, the Scheme, by protecting the lands in the waterfront zone from flooding opens up the possibility of re-development of the South Quay and Dock Area, and also the lands in the lower area behind the waterfront area.

Arklow and Environs LAP: “PROMOTING AND FACILITATING AN OVERALL IMPROVEMENT IN THE QUALITY OF LIFE IN ARKLOW”

The LAP states: *A high ‘quality of life’ standard within a settlement is a key component to facilitate the future economic development of that area. Factors that make a settlement attractive for both employers and their employees are the key to a successful economic development strategy. Specific actions to improve quality of life include:*

- *Providing high quality residential development with supporting educational, recreational and community facilities;*
- *Ensuring a vibrant town centre with a high quality public realm;*
- *Creating an attractive urban environment to facilitate residency of the projected labour force;*
- *Ensuring the appearance of development complements existing environments and is of the highest quality;*
- *Increasing and improving the range of quality of recreational, amenity and cultural facilities.*

Response:

The proposed Scheme will incorporate an improved access to the river (including pontoon) at River Walk (beside St Mary’s Car Park). While the Scheme does restrict access where the Flood Defence Walls are constructed, access to the river is maintained at the Dock area as well as River Walk.. The design of the Urban Realm on the south bank of the River will provide a high quality of life, with more defined areas for leisure, access and a more pleasing environment, while providing the level of protection from the river and sea that is required for the people to enjoy their homes and streets. It will also provide a safer environment for pedestrians and vulnerable road users. See also report from Byrne Looby which includes commentary on the design of the footpaths and landscaping along the South Quay, accompanying this report.

Wicklow County Council is satisfied that the Scheme does not contravene this element of the LAP.

Arklow and Environs LAP “Chapter 5 KEY AREAS”

The LAP states: Arklow’s waterfront is a key recreational and tourism amenity, the quays and harbour are an infrastructural asset and an important source of economic activity associated with the town. Pursuing an enhanced role for this area would benefit the town as a whole. Whilst it is important that the port remains commercially competitive there may be opportunities for the enhancement of the area alongside the sustainable regeneration and re-development of the port, harbour and quay areas.

Response:

As with the previous comments, the design of the Urban Realm on the south bank of the River will provide a high quality of life, with more defined areas for leisure, access and a more pleasing environment, while providing the level of protection from the river and sea that is required for the people to enjoy their homes and streets. It will also provide a safer environment for pedestrians and vulnerable road users. It will attract visitors both local and from further afield.

Furthermore, the approval of the Scheme would support new and improved opportunities for tourism and recreation related activities. This is because, once the land is protected, it will create opportunities for new tourism and recreational businesses / enterprises to be developed. New on shore shops / units / stores etc could not be considered while the lands are at such serious risk of flooding.

Wicklow County Council is satisfied that the Scheme does not contravene this element of the LAP

Arklow and Environs LAP “Arklow Town Centre Strategy Objectives”.

The LAP states: To support opportunities to create better linkages between the Main Street, the river, the north and south quay and the beaches, in particular access routes and views between the two.

Response:

The design of the Urban Realm, will provide a high quality usable, accessible connection between the Town Centre, via St Mary’s Car Park to the river side and on to the Dock area. Also, the new footpaths go a long way towards connecting the South Beach to the Town Centre.

Wicklow County Council is satisfied that the Scheme does not contravene this element of the LAP

Arklow and Environs LAP “MARITIME HERITAGE”.

The LAP states: To support in-depth development of the Waterfront zone (WZ), for a mix of residential, commercial, employment, leisure and tourism uses.

WZ3 To support existing and proposed water related and maritime activities in the Waterfront Zone including sailing, fishing, other water sports and commercial shipping activities, including the development of jetties, marinas and other support infrastructure.

WZ4 To support and facilitate existing and future commercial harbour activities and to resist developments that would undermine the commercial harbour of the area.

WZ5 To support and facilitate maritime activity and 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.

WZ6 To require any new developments in the Waterfront Zone to meet a high standard of design that respects the unique historical, environmental, visual and recreational amenities of the area.

WZ7 To support and facilitate the development of new infrastructure necessary for the continued operation and development of the harbour.

WZ8 Further retail development in the Waterfront Zone shall be restricted to that required to meet the everyday convenience needs of future residents or niche comparison uses such as those related to tourism and the maritime function of the area.

WZ9 To require any new developments to be suitably set back from the water's edge and to provide public routes and places along waterfronts; to support the development of a footbridge across the entrance to south dock.

WZ10 To ensure that access to the water, such as steps / slipways / river/ beaches etc are maintained and improved.

WZ11 To encourage and facilitate tourism and leisure related uses in the Waterfront Zone including hotel / accommodation facilities and leisure uses to complement the marina and associated boating uses and activities.

WZ12 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.

WZ13 To facilitate the development of new opportunities for pedestrian and cycle links from the Waterfront to the town centre.

Response:

Wicklow County Council does not consider that the Scheme hinders the objectives above.

The design of the Urban Realm on the south bank of the River will provide a high quality of life, with more defined areas for leisure, access and a more pleasing environment, while providing the level of protection from the river and sea that is required for the people to enjoy their homes and streets. It will also provide a safer environment for pedestrians and vulnerable road users.

The regeneration of the area can proceed, if the Scheme is approved, as the risk of flooding will be abated. In the short term, the approval of the Scheme would improve confidence for landowners (and the Local Authority) to progress regeneration of the area. The development of new housing, leisure, recreation, tourism, business etc is more likely to proceed, if the Scheme is approved and completed. The achievement of the objectives above are much less likely without the Scheme.

The continued use of the Harbour area is assured by the design of the Scheme. Access to the dockside around the Lifeboat station and beyond is unaffected. Access to the existing slipway and the former synchrolift site (Plot 124d) will be by way of demountable defences, thus assuring access is maintained.

The footbridge objective mentioned above is not compromised by the proposed Scheme, in fact bringing high quality footpaths from the Town Centre to the Dock area will enhance the access to the area, thus increasing the value of the proposed footbridge.

Wicklow County Council is satisfied that the Scheme does not contravene this element of the LAP.

Response to submission on S226 Application to ABP re “Contravention of County Development Plan/Arklow and Environs Local Area Plan 2018- 2024”

Overview

One of the S226 submissions made to An Bord Pleanála (ABP) in respect of the proposed Arklow Flood Relief Scheme includes observations relevant to the County Development plan and the Arklow and Environs Local Area Plan. A response to each issue is individually addressed below. These responses were submitted to An Bord Planala on the 13th of January as requested by the Board. For context, these responses are repeated below.

Response

Arklow and Environs LAP - Objective CZ11

Section 6.3.1 of S15 raises concerns in relation to the Objective CZ11, Cell 11.

Chapter 11- CZ11 Cell 11 Arklow Environs

This cell comprises the coastal area within the settlement boundary of ‘Arklow Town and Environs’. There are long sandy beaches along most of this cell, with the central harbour area the location of intensive residential and industrial development and the southern end marked by Arklow Rock. The area around Arklow Rock – Askinnity, to the south, is a designated pNHA.

Objective CZ11

To enhance the visual, recreational and natural amenities of the Arklow coastal area, in accordance with the policies and objectives set out in the Arklow Town and Environs Local Area Plan.

To facilitate the development and enhancement of visitor and recreational facilities along the coastal area, particularly walking routes, car parking areas, signage, changing / toilet facilities and water based clubs.

To support and facilitate the development of marine and shipping activity in Arklow, particularly the recreational use of the existing harbour / marina and the development of a roll on-roll off port at the existing Roadstone jetty.

WCC is satisfied that the design of the scheme does not conflict with the Coastal Zone objectives for Cell 11 set out in the CDP; the scheme has been designed in full cognisance of these objectives and in particular, the scheme provides for:

Improvement of the visual amenities of the area by the provision of improved public realm areas which include seating and glazed panels, landscaping and tree planting in various areas highlighted along with other items in Chapter 12 – Landscape and Visual, shown in

the EIAR Vol3 Appendix 1 - Photomontages and Drawings 6545_301_Rev03.pdf, 6545_302_Rev03.pdf, and 6545_303_Rev03.pdf

Improvement of the recreational and visitor amenities of the area by the provision of improved public realm areas, including terraced areas, raised walkways, landscaping, a viewing platform as well as outer walkways continuing to Riverwalk and a pontoon for recreational activities. See Drawings 6545_301_Rev03.pdf, 6545_302_Rev03.pdf, and 6545_303_Rev03.pdf

Improvement of the natural amenities of the area by the provision of an extension of the North River bank to provide additional habitat areas, bat boxes, considerable native woodland planting areas, three floating roost platforms, and other items highlighted in Chapter 10 (Biodiversity) of the EIAR

The development of marine and shipping activities by improved recreational access with a purpose built pontoon at River Walk, and dredging the river will improve the draught available to vessels as discussed in the EIAR Chapter 4 Description of Proposed Scheme.

Arklow and Environs LAP - 8.3.5 Open Space (OS)

Section 6.3.2 of S15 raises concerns in relation to 8.3.5 Open Space (OS).

The text quoted in Section 8.3.5 relates to the different types / categories of open space identified / zoned in development plans

8.3.5 Open Space

The delivery of new sports and other outdoor community facilities and spaces is dependent on adequate 'open space' being reserved and developed. 'Open space' can take many forms but for the purpose of this plan is generally considered to be space designated for such use in Local Area Plans, Town Plans or Action Area Plans or land reserved or set out for active and passive uses and visual amenity purposes as part of new development of housing or commercial development. Open space can take a number of forms, with some use types overlapping:

- 1. Private open space – open space owned and / or dedicated to use of single individuals or small groups for example private gardens, terraces, yards, balconies or shared private spaces in apartment developments;*
- 2. Residential Open Space - the open space generally provided in housing developments that is public in the sense that there are no barriers to access, but its function is to provide for use principally by the residents of that development. For land use zoning purposes, as such spaces form an integral part of any residential zone, such space will normally be zoned 'RE – Existing Residential'.*
- 3. (Active) Open Space – space provided or designated for uses such as sports grounds, playing fields, hard surfaced courts, parks and walkways, playgrounds etc; (for the purpose of land use zoning, two forms of such open space is designated - 'active open space' which is that space used / proposed for organised sports such as playing fields, courts etc whereas 'open space' is used to denote those existing / planned spaces that are intended for more casual usage such as parks and playgrounds)*
- 4. Passive Open Space – these are lands that are not designated for 'active' use and generally are undeveloped natural areas such as flood plains, buffers zones along*

rivers, areas of natural biodiversity, where the general objective is to maintain the lands in their current undisturbed state;

5. *An emerging new form of open space is the use of land for allotments, etc...*

With respect to the parts of the scheme that are located in the OS2 zone, this is the definition of OS2 in the Arklow LAP:

OS2: OPEN SPACE To protect and enhance existing open, undeveloped lands. To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along EU and nationally protected sites (Natura 2000 sites, NHAs etc), watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity.

The 'use' table in the Arklow LAP states:

Open space (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. As these open lands are not identified or deemed necessary for development for recreational purposes, other uses that are deemed compatible with proper planning and sustainable development may be open for consideration where they do not undermine the purpose of this zoning.

It should be noted that this makes allowance for developments that are not strictly 'open space' developments but are developments that do not 'undermine' the role 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'.

It should further be noted that the majority of the land zoned OS2 along the area affected by the Scheme west of the Bridge on the south side of the river (see extract from zoning map below OS2 in green) is actually already public road or footpath, paved and not suitable as "green breaks between built up areas, green corridors and areas of natural biodiversity".

The area affected by the Scheme to the East of the Bridge is not zoned OS2.



Therefore, it seems that some of the proposed flood prevention and urban realm improvement works are located on ‘unzoned’ lands and therefore any ‘curtailment’ that might be inferred/suggested by objectors by the OS2 designation adjoining won’t actually be applicable on the unzoned lands.

It is suggested that the scheme conflicts with the ‘open space’ designation on the South Quay. There is no open space identified / zoned along the south quay east of the bridge. There are some areas identified / zoned as OS1 and OS2 on the south river walk to the west of the bridge.

The objectives relating to ‘open space’ set out in the CDP are only relevant where land is so zoned; therefore these objectives are not relevant to the south quay area east of the bridge, where no land is zoned for ‘open space’ use. There are no lands zoned ‘buffer zone’ (i.e. passive open space OS2) on the south quay east of the bridge; therefore the OS2 objectives do not apply.

It is suggested that as the lands on the south quay are zoned ‘RE’ that Objective CD44 is relevant and provides protection to any existing green spaces in this area. This may not be correct as it is not clear that all / any open areas in this area are in situ as a result of being purposefully designed, set out and designated as part of a housing development for the sole use of residents in this area; residences in this area have developed on an ad hoc basis over the years, with existing green spaces appearing to comprise grass verges between the road edge and the house / quay walls. These do not appear to be spaces that were designed and dedicated as open spaces on foot of a residential development and therefore Objective CD44 would not apply.

With respect to the area west of the bridge, full cognisance has been taken of the zoning designations which include OS1 and OS2 areas and in particular, at this location to scheme provides for improved public realm design close to the bridge (see Drawing 6545_301_Rev03.pdf) that includes terraced areas raised walkways, landscaping, tree planting, a viewing platform as well as outer walkways continuing to Riverwalk (Also see Appendix 12.1 (*Photomontages*) of the EIAR).

Community Development

Section 6.3.3 of the Submission S15 refers to Community Development

Objective CD2 relates to the plan making process and therefore has no relevance to this process. WCC is satisfied that the consultation process has been robust and has provided the community with significant opportunities for engagement.

“CD2 During the local plan making process for towns and villages, to seek to facilitate community development and socially inclusive communities, through proper land use zoning and transportation planning, phasing and the setting out of high standards of design in both streets and buildings”

County Development Plan - Chapter 9 Ports, Harbours, Marinas and Aviation Objectives

Section 6.3.4 of the Submission S15 refers to Chapter 9 Ports, Harbours, Marinas and Aviation Objectives (County Development Plan).

The County Development Plan states:

“TR39 To promote and facilitate through appropriate transport planning and land-use zoning the expansion or development of recreational facilities and marinas at Bray, Greystones, Wicklow and Arklow harbours”.

WCC is satisfied that the design of the scheme does not conflict with the objective TR39 as set out in the CDP; the scheme has been designed in full cognisance of these objectives and in particular, the scheme provides for:

Improvement of the recreational amenities of the area by the provision of purpose built pontoon and dredging the river will improve the draught available to vessels. Coupled with improved public realm areas, including terraced areas, raised walkways, landscaping, a viewing platform as well as an outer walkway The proposed continuous promenade will now allow vulnerable road users travel (adjacent to the river) from the River Walk to Arklow Dock. See Drawings 6545_301_Rev03.pdf, 6545_302_Rev03.pdf, and 6545_303_Rev03.pdf also discussed in the Chapter 4 (*Description of Proposed Scheme*) of the EIAR .

The development of marine and shipping activities by proposing to construct a purpose built pontoon for recreational purposes. Upon consultation with Arklow Rowing Club and Sea Scouts the proposed demountable flood defence in Arklow Dock is now to be “maintain open” to facilitate the recreational users.

In addition, the scheme proposes to dredge a section of the Avoca River which will greatly improve the existing issue of a low draught, as discussed and welcomed by Arklow Sailing Club.

County Development Plan - Objectives FL6/FL7

Section 6.3.6 of the Submission S15 refers to FL6/FL7 Objectives.

Wicklow County Council is satisfied that the design of the scheme does not conflict with the objectives FL6 and FL7 of the CDP; the scheme has been designed in full cognisance of these objectives and in particular, the scheme does not include significant new areas of hard surfacing. There are significant areas of existing hard surfacing in and around the Avoca River, including both roads / footpaths and hard surfaced areas on the quays and harbour areas reflecting their commercial maritime function and needs for the loading / unloading for goods. These areas have been in situ for many decades.

The scheme as designed provides for some small areas of new hard surfacing at South Quay which are necessary in order to meet the scheme goals of constructing a Flood Relief Defence while maintaining the existing quay wall, thus realigning other items like footpaths, Road etc and there is no better alternative design available to meet the scheme goals. All proposed hard surfaced areas are proposed to be constructed using materials in keeping with the area and a revised drainage design (including pumping stations) is proposed to be integrated into these areas. To compensate for the small additional areas of hard surfacing, a new area of soft landscape are proposed on South Quay at the bridge and other soft landscaped areas are being maintained as requested by the public. In addition, the scheme includes substantial proposals for public realm improvements and ‘greening’ in existing and proposed hard surfaced areas, including new planting, seating etc as shown on drawing 6545_301_Rev03.pdf, 6545_302_Rev03.pdf, and 6545_303_Rev03.pdf

With respect to the concerns raised regarding fluvial flooding and drainage on the south quay, the scheme provides residents the (OPW) standard level of defence (i.e. 1% AEP Fluvial and

0.5% AEP Coastal event). A Pluvial flood event is one which occurs during high rainfall events, when there is significant run-off from hardstand areas.

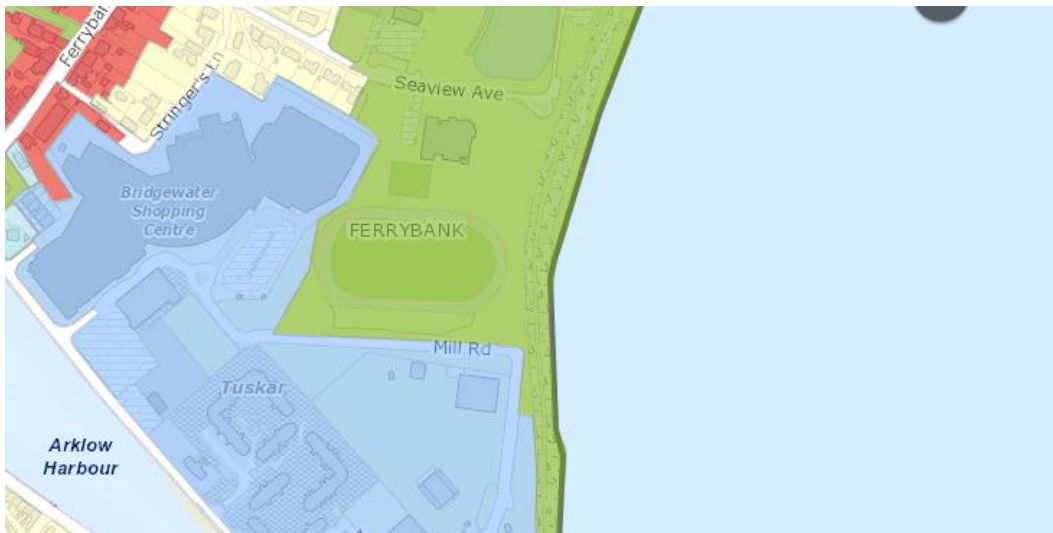
The Flood Relief Scheme proposes new storm drainage (see 88601-1051 and Section 4.4.5.3 of Chapter 4 of the EIAR) and 3 pumping stations constructed on the dry side of the wall with Non Return Valves to defend against a pluvial event.

Arklow and Environs LAP - Open Space designation at Running Track (Site Compound 2)

It is suggested that the scheme conflicts with the Open Space designation at the running track.

This is not correct as Site Compound No2 is to be established on the grass area on Mill Road and adjacent to the Running Track (not on the track), alternatives on the northside of the Avoca River were difficult to identify.

This temporary compound is adjacent to a very large area of Open Space. This area will be re-instated once the Scheme is completed.



Arklow and Environs LAP - Objectives HT3 and HT4 re Heritage

Section 6.4.2 of the Submission S15 refers to objectives HT3 and HT4 of the LAP re Heritage.

WCC is satisfied that the design of the scheme does not conflict with the objectives HT3 and HT4 of the Arklow LAP; the scheme has been designed in full cognisance of these objectives and in particular, the scheme does not:

impact negatively on properties of heritage value or on their development potential (see Chapter 11 of the EIAR)

adversely impact on the existing Riverside Trail (River Walk) and in fact enhances same extending the existing route by the outer walkway over the river linking to the into the large public realm area west of Arklow bridge which contains glazed panels and a viewpoint, and onward along South Quay to the Fish Dock.

adversely affect views of the river because the raised walkways and outer walk walkway over the river the viewpoint

remove without compensatory measures an existing swimming / bathing point, the proposal contains steps to the river at the existing location for swimming also a purposely built pontoon. (see 6545_301_Rev03.pdf).

remove without compensatory measures existing trees and open spaces, as discussed in Chapter 12 Landscape and Visual, (see Appendix 12.2 (*Tree Survey Report*) of the EIAR) and Section 10.9 of this Response document

adversely impact on the character of St. Mary's Park and in fact the Scheme enhances it by improving the footpaths from the park along River Walk and South Quay to the Fish Dock

Arklow and Environs LAP - Objective HT7 re Marine Heritage

Section 6.4.3 of the Submission S15 refers to objectives HT7 re marine heritage.

HT7 in the Arklow LAP states: *To facilitate the development of initiatives to highlight Arklow's maritime heritage in the public realm*

WCC is satisfied that the design of the scheme does not conflict with the objective HT7 of the Arklow LAP; the scheme has been designed in full cognisance of these objectives and in particular, the scheme:

Flood Design level requires a barrier of this height 1.150m

Areas where initiatives to highlight Arklow's maritime heritage would be in Flood Zone A, thus the implementation of the Scheme would improve opportunities to carry out development.

Access to the historic slip known as Tyrrell's slip is being removed (a former launch for ships). However, to promote the heritage of the location, the slip and its historic boat rails will remain in place and a section of glass wall and signage will be constructed at the location. Existing mooring posts/stones (AH7 of Appendix 11.3 of the EIAR) located along the South Quay will be removed prior to the construction works and replaced along the section of existing quay wall to be retained. These measures are described in Section 15.2.2 of this submission document.

Glazing is only used in high trafficked areas due to issues with vandalism and budget issues however additional glazing has been suggested (in this submission) which is all located on South quay

Where possible trees were retained however in locations where removal is required trees will be replaced with native species

Arklow and Environs LAP - Objectives CD1 and HT8

Section 6.4.4 of the Submission S15 refers to Objectives CD1 and HT8 of the Arklow Environs LAP

CD1 States: *To facilitate and encourage a series of high quality open spaces throughout the town, preferably as part of a larger linked green network that is available to all ages and accessible to everyone, including people with mobility impairments.*

HT8 States: *To facilitate the development and enhancement of green infrastructure resources, including access to, connectivity between areas of interest and linkages between*

green spaces including the coast, where feasible within Arklow and environs settlement boundary (see Map No. 10.1).

Wicklow County Council is satisfied that the design of the scheme does not conflict with the objectives CD1 and HT8. Currently there is no access for vulnerable road users along South Quay as they are required to share the road. The Scheme will enhance access along here by installing high quality landscaping and continuous footpaths on South Quay to link the Fish Dock with the River Walk.

Arklow and Environs LAP - RE Zoning

Section 6.4.8 of the Submission S15 suggests the Scheme does not comply with the “RE” zoning as set out in the LAP.

The land use zoning objective “RE” on page 53 of the LAP states: *to protect, provide and improve residential amenities of existing residential areas*

Wicklow County Council is satisfied that nothing in the Scheme prevents the development of the RE zone in accordance with the zoning objective stated. In fact the Scheme, by protecting the lands in the waterfront zone from flooding opens up the possibility of improving the residential area of the South Quay, and also the lands in the lower area behind the waterfront area.

Arklow and Environs LAP - TR6

Section 6.4.9 of the Submission S15 suggests the Scheme needs to be re-designed to align with objective TR6 of the LAP.

TR6 states: *To promote and encourage the recreational use of coastline, rivers and lakes and the development of ‘blueways’¹⁸ subject to normal environmental protection and management criteria. Where such recreational uses involve the development of structures or facilities, the Planning Authority will ensure that the proposals will respect the natural amenity and character of the area, listed views and prospects onto and from the area in question. Where possible, such structures should be set back an appropriate distance from the actual amenity itself and should not adversely affect the unique sustainable quality of these resources.*

The submission S15 discusses concerns about the quality of design and suggests additional landscaping.

The Scheme includes for high quality design of the Urban Realm including high quality landscaping and footpaths along River Walk and South Quay. It includes for replacement river access at St Mary’s Car park and for water access at the Fish Dock. It includes for glass panels (and this response has suggested additional glass panels) to ensure views of the river are retained.

Arklow and Environs LAP - Waterfront Strategy Objectives

Section 6.4.10 of the Submission S15 suggests the Scheme is contrary to Arklow’s Waterfront Strategy objectives as set out in the LAP.

The land use zoning objective “WZ” on page 53 of the LAP states: *to provide for the development and improvement of the waterfront zone, to facilitate the continuation of the*

existing employment, maritime and port uses and to promote and provide for residential and mixed- use development.

This does not refer to the South Quay area as inferred from the submission but rather to the Docks area. Wicklow County Council is satisfied that nothing in the Scheme prevents the development of the waterfront zone in accordance with the objective stated.

In fact, the Scheme, by protecting the lands in the waterfront zone from flooding, opens up the possibility of re-development of the South Quay and Dock Area, and also the lands in the lower area behind the waterfront area.

Conclusion

WCC is satisfied that the design of the scheme does not conflict with the objectives and zoning of the County Development Plan and Arklow and Environs Local Area Plan.