

	Arklow LPF Variation No.5
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Who are you:	Private Individual
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Reference:	ARKLPF-084713
Submission Made	November 4, 2025 8:49 AM

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

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

Local Planning Framework PART A Strategy

- A.1 Introduction
- A.2 County Development Plan Strategy for Arklow
- A.3 Factors Influencing Future Development Options
- A.4 Overall Strategy

Local Planning Framework PART B Settlement Specific Objectives.

- B.1 Town Centre Regeneration
- B.2 Arklow Waterfront Zone
- B.3 Housing Development
- B.4 Economic Development & Employment

- B.5 Tourism Development
- B.6 Social & Community Development
- B.7 Heritage, Biodiversity & Green Infrastructure
- B.8 Physical Infrastructure
- B.9 Zoning & Land Use
- B.10 Specific Local Objectives

Maps:

- Roads & Transportation Strategy Maps

Appendices:

- Infrastructure Assessment, Phasing and Implementation

Maps:

Please refer to the attached MS Word file for full details of my submission.

Upload a File (optional)

Arklow Development Plan Variation 5 Submission to WCC Oct 2025.docx, 0.02MB

Submission in Relation to Arklow Local Planning Framework Variation No. 5 to the County Development Plan 2022 - 2028

Submitted on 4th November, 2025 to Wicklow County Council (WCC) via the WCC Online Consultation Hub

Submitted by: Mr. Paul A. Byrne BE MSc [REDACTED]

In reference to the Arklow Local Planning Framework Variation No. 5 to the County Development Plan 2022 – 2028, I wish to make the following submission to Wicklow County Council (WCC) in relation to the relevant draft Variation no. 5 documents made available to the Public on the WCC website:

1.0 Flood & Coastal Management Objective ARK 84: Coastal Flooding Risks and Rehabilitation of Existing Coastal Flood Defences

Objective ARK 84 related to the Flood and Coastal Management Sectors of the Proposed Variation No. 5 states the following:

“To work with the OPW and any other relevant bodies to address the effects of sea level changes, coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas. In particular:

- To facilitate the provision of new or the reinforcement of existing coastal defences and protection measures where necessary and in particular to consider the implementation of the measures identified in the ECRIPP and any other similar studies that are produced during the lifetime of the LPF.*
- To employ soft engineering techniques or natural solutions as an alternative to hard coastal defence works, wherever feasible.*
- To facilitate and promote the carrying out of coastal defence and protection works in accordance best environmental practice and in manner that only considers alteration of the natural sediment flow and/or increased erosion if there is an overall benefit to habitats as a result of the proposals”.*

In this submission to WCC, I am recommending that the following additional text in red be added to Objective ARK 84:

- To undertake regular 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 Kynoch Park & the Duck Pond, to the new Uisce Éireann Wastewater Treatment Plant.*

2.0 ARK 36 and ARK 64: Tourism & Recreation Objectives

Objective ARK 36 related to Tourism & Recreation Sectors of the Proposed Variation No. 5 states the following:

“To protect and enhance existing, and support the development of new walking, cycling routes / trails, including facilities ancillary to trails (such as sign posting and car parks) and the

development of linkages between existing trails in the area. In particular, to encourage and facilitate the maintenance and improvement of:

- *The Avoca River Walk and linkages to Vale Road and Arklow Main Street;*
- *Lamberton Avenue/Woodlands Park leading to Glenart Woods;*
- *Walking infrastructure along North Quay linking to the coastal walk and Kynoch Park;*
- *Walking infrastructure along South Quay linking to Arklow South Beach via Arklow Port and the former Arklow Pottery site”.*

While Objective ARK 64 states:

“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.”*

In this submission to WCC, I am recommending that the following additional red text be added to Objective ARK 36 and ARK 64:

- Existing walking infrastructure on top of the coastal protection rock armour embankment that extends from the Caravan Park along the sea side perimeter of Kynoch Park & the Duck Pond, to the new Uisce Eireann Wastewater Treatment Plant.

3.0 Infrastructure Assessment & Implementation Programme: Timelines for the Implementation of Key Infrastructure

In this submission, I am recommending that the stated time frames for delivery in the Plan be changed for the following Objectives:

ARK 69 (g. Major Junction Improvements): The delivery schedule as contained in the Infrastructure Assessment & Implementation Programme document be changed from “Ongoing” to “Immediate or Short Term”

ARK72: The delivery schedule as contained in the Infrastructure Assessment & Implementation Programme document be changed from “Ongoing” to “Immediate or Short Term”

ARK 82 (a. The Southern Port Access Road): The delivery schedule as contained in the Infrastructure Assessment & Implementation Programme document be changed from “Ongoing” to “Immediate or Short Term”

ARK 84: The delivery schedule as contained in the Infrastructure Assessment & Implementation Programme document be changed from “Ongoing” to “Immediate or Short Term”

Changing these time frames from Ongoing to Immediate or Short Term is necessary to ensure that these items of key infrastructure are constructed in a timely manner which will help alleviate bottlenecks to development, ease existing traffic congestion and allow for safer pedestrian/cycle routes in Arklow. Providing them on an Ongoing basis will take too

long and will negatively impact the quality of life for all residents in Arklow – we need these facilities now !

4.0 WCC to Update the Variation No. 5 Documents to Include a No Net Loss to Biodiversity Procedure for all Proposed Public & Private Developments to be Implemented under the 2022-2028 Development Plan

In this submission, I am recommending that WCC update the text of the ARK 56 Objective to include the requirement for a No Net Loss to Biodiversity policy. The current proposed text for ARK 56 is as follows:

ARK 56: “Ensure that development proposals support the protection and enhancement of biodiversity and 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 geo-morphological 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 am recommending that this text be updated to include the following additional text, shown in red:

ARK 56: “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 geo-morphological 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.”