

	Arklow Local Planning Framework: Proposed Material Alterations to the Wicklow County Development Plan (2022– 2028) Submission Report
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Who are you:	Agent
Name:	Castlethorn
Reference:	ARKPMA-103928
Submission Made	May 29, 2026 3:49 PM

Topic

LPF - Proposed Material Alterations No. 27 Submission

Submission

We at Stephen Little and Associates, submit the following submission on behalf of our client Castlethorn in relation to Material Alteration No. 27. This submission has been uploaded as a file.

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26027_Proposed_Material Alteration_Submission_Arklow_DLPF_28052026 Final for submission.pdf, 8.88MB

Formal
Submission –
Proposed
Material
Amendments
to Arklow
Local Planning
Framework
and Wicklow
County
Development
Plan (Variation
6)

Lands at Tinahisk
Upper, Money Big &
Money Little, Arklow,
Co. Wicklow

On behalf of
Castlethorn

May 2026

Document Control: -

Author	Signed off by	Purpose	Date
Sarah Jane Coughlan	Richard Kealey	Draft LPF Submission Material Amendment	29.05.2026

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1 INTRODUCTION

This submission is made by Stephen Little & Associates, Chartered Town Planning and Development Consultants, 26/27 Upper Pembroke Street, Dublin 2 with input from the Client and its expert multi-disciplinary development and design advisors are instructed to make this formal submission on behalf of our client Castlethorn. We confirm that collectively we have carefully considered the content of the proposed LPF and associated Material Amendments.

This submission is made in respect of the draft public consultation stage of the proposed Material Alterations to the Arklow Local Planning Framework, prior to the submission deadline of 5pm on the 29th of May 2026.

We trust that the planning authority will have regard to the contents of this submission, set out below. We would respectfully request that all correspondence regarding same is sent to this office.

From the outset, we wish to confirm that our Client is wholly supportive in principle of Wicklow County Council preparing the Arklow Local Planning Framework and associated variation to the County Development Plan and welcomes the opportunity to make its observations on the Material Alterations.

The proposed Material Amendments to the Arklow Local Planning Framework include lands in which our client holds an interest, to a total area of 39.2 hectares. Planning permission under Reg. Ref. 24325 relates to 19.3 hectares of these lands.

We refer to the map prepared by O'Mahony Pike, Architects (OMP) which supports this submission as an enclosure and shows the context of the previously approved development under Reg. Ref 24325 within the context of the proposed amended zoning of these lands. This map is enclosed and forms part of the Castlethorn submission.

We respectfully request that Wicklow County Council has due regard to the contents of this submission and proceeds with minor zoning boundary adjustments to correct mapping irregularities, linked directly to the zoning of **proposed Material Amendment 27**. We note from the outset that our client is not seeking to reopen the wider zoning strategy for the lands rather requesting the Planning Authority to **consider a consistent zoning tidy-up to reflect the extant permission (Reg. Ref: 24325)** which will avoid any unnecessary ambiguity at development-management stage. We could also note that our client is keen to develop these lands and a Stage 1 LRD Pre-Planning meeting for an alteration to that LRD permission is scheduled in early June.

The proposed administrative corrections will not extend the settlement boundary, introduce a new development area nor will it result in an increase to the overall quantum of development beyond what has been already permitted.

2 EXECUTIVE SUMMARY

In summary the key point raised in our submission concerns Proposed Material Alteration No. 27 which intends to amend map no.1 Land Use Zoning and SLO4 Boundary for lands at Money Big, as follows:

This submission is made in response to Material Alteration No. 27 of the Draft Arklow Local Planning Framework.

The intended purpose of this submission is for a **technical zoning refinement and mapping clarification in respect of the SLO4 lands** with the intent **to provide consistency between the zoning framework and the extant permitted development on the site**. As currently drafted, the boundary/zoning amendment proposed under Material Alteration No. 27 does not fully align with the permitted scheme on the SLO4 lands. Our client has already engaged with Wicklow County Council in terms of making amendments to that extant permission under Reg Ref: 24325 with a Stage 1 meeting due to convene in early June 2026. The proposed Material Amendment as presented under Material Amendment 27 would result in the zoning line for these lands which do not fully align with the permitted scheme and creates an unnecessary confusion, particularly where the permitted layout already deviates from the precise zoning lines around the school site. As noted above, our client is a large scale commercial residential housing developer with a proven track record and is keen to provide much needed housing in south Arklow.

3 TINAHISK LANDS WITHIN THE ARKLOW LPF

The lands in question to which this submission relates, are bounded predominantly by residential, recreational and employment uses and represent greenfield land. The lands have been long identified for residential development by Wicklow County Council. The Draft Arklow Local Planning Framework identifies the lands as **SLO4 Moneylands Tinahisk South** as an Urban Extension with RN2 zoning objective. The Arklow Local Planning Framework notes the following with regards to SLO4:

“This SLO is located on the south side of the town, in the townlands of Tinahisk Upper, Money Little and Money Big. The site is bounded to the north by SLO3, to the east by the golf club and quarry site, to the south by open farmlands and to the west by the railway line. Access to this land is currently provided by an access road and railway bridge from the Knockmore roundabout.

This SLO area measures c. 70ha and shall be developed as a mixed use area comprising of c. 27.2ha of new residential development (c. 11.7ha RN1 and 15.5ha RN2), c. 9.75ha of new employment (E1), c. 1.75ha for local shops and services (LSS), c. 4.5ha for community and education use (CE) and c. 16.35ha of open space areas (c. 4.75ha AOS, c. 1.1ha OS1 and c. 10.5ha OS2).

*An ‘Action Area Plan’ (masterplan) under the previous LAP has already been agreed for these lands and **consent has already been secured for the development of a 19.3ha area of this SLO, comprising the development of: 476 no. residential units on the RN1 lands; public open spaces including a new public park; a local shops and services zone comprising retail units, a community centre and office space; a childcare facility and temporary upgrade works to the existing railway bridge and construction of part of the Port Access Road.**”*

The submission lands of which our client has an interest, currently represent greenfield land and a location of same, can be seen below in figure 1 overleaf. The land amount to 39.2ha, our client Castlethorn have an interest in these lands. Planning Permission an LRD development for 476 residential units granted under Reg Ref. 24325 on the 21st of January 2025.

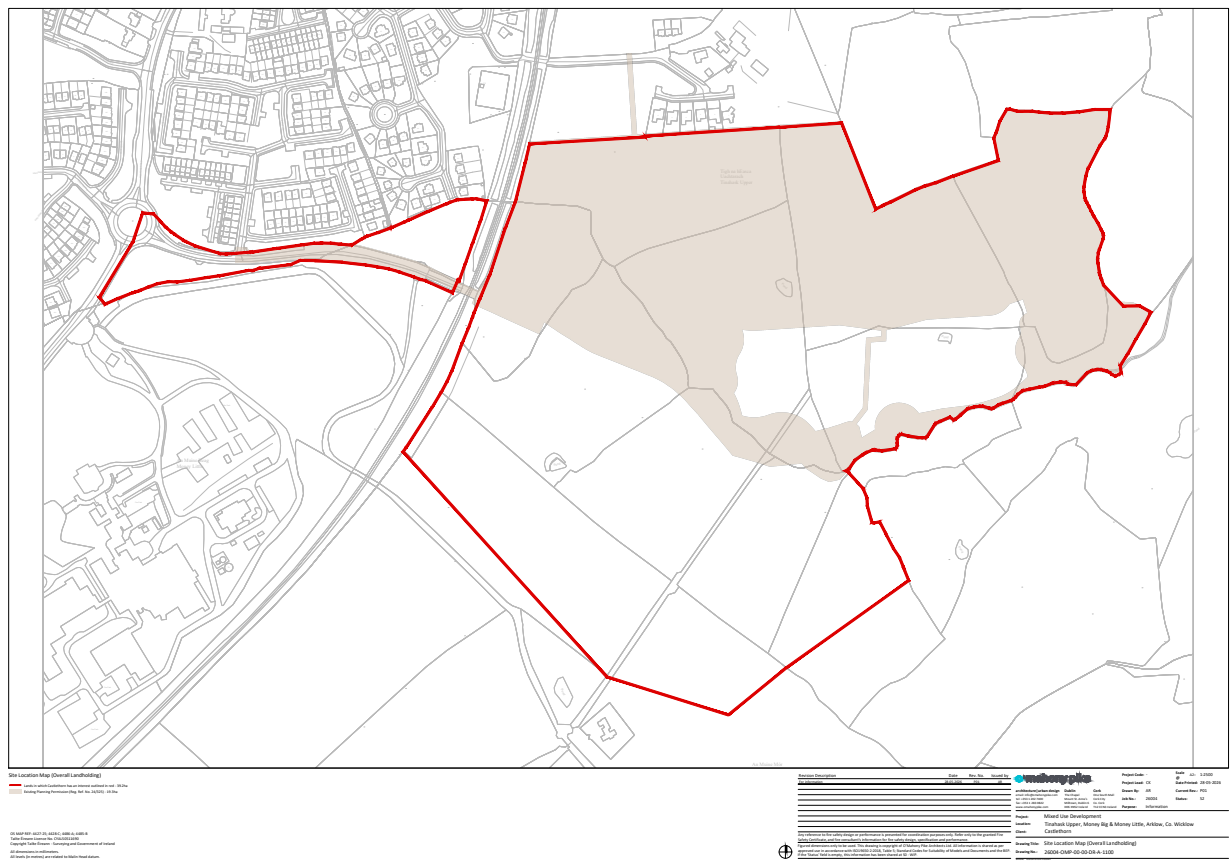


Figure 1: Tinahisk Lands subject to Castlethorn interest outlined in red and existing planning permission on the site hatched in beige. *Source: Map prepared by OMP Architects (see appendix).*

4 PROPOSED MATERIAL ALTERATIONS

4.1 Introduction

Generally, we welcome the proposed material alterations on the Draft Arklow Local Planning Framework.

In total, 28 material amendments (here within referenced as MA) are proposed, only one of which has direct effect on our clients land interest. The structure of this response identifies the relevant MA as it pertains to our client's interests lands and commentary on same.

We welcome the opportunity to comment on the proposed MA and would reaffirm that our Client is wholly supportive in principle of Wicklow County Council preparing the proposed material amendments to the Draft Arklow Local Planning Framework and welcomes the opportunity to make its observations on the variation of the Local Planning Framework.

We respectfully request that Wicklow County Council has due regard to the contents of this submission in arriving at a fully informed approach to realising the sustainable development potential of the land, in advance of the adoption of Variation No. 6 of the Wicklow County Development Plan 2022-2028 and Arklow Local Planning Framework.

The relevant planning context for the site is the Wicklow County development Plan 2022 – 2028 as the Arklow Local Area Plan 2018 – 2024 has now withered. However, the development is considered to be still under the zoning of the lands per the Arklow Area Plan 2018 – 2024 (now withered) as can be seen below in Figure 2, as follows:

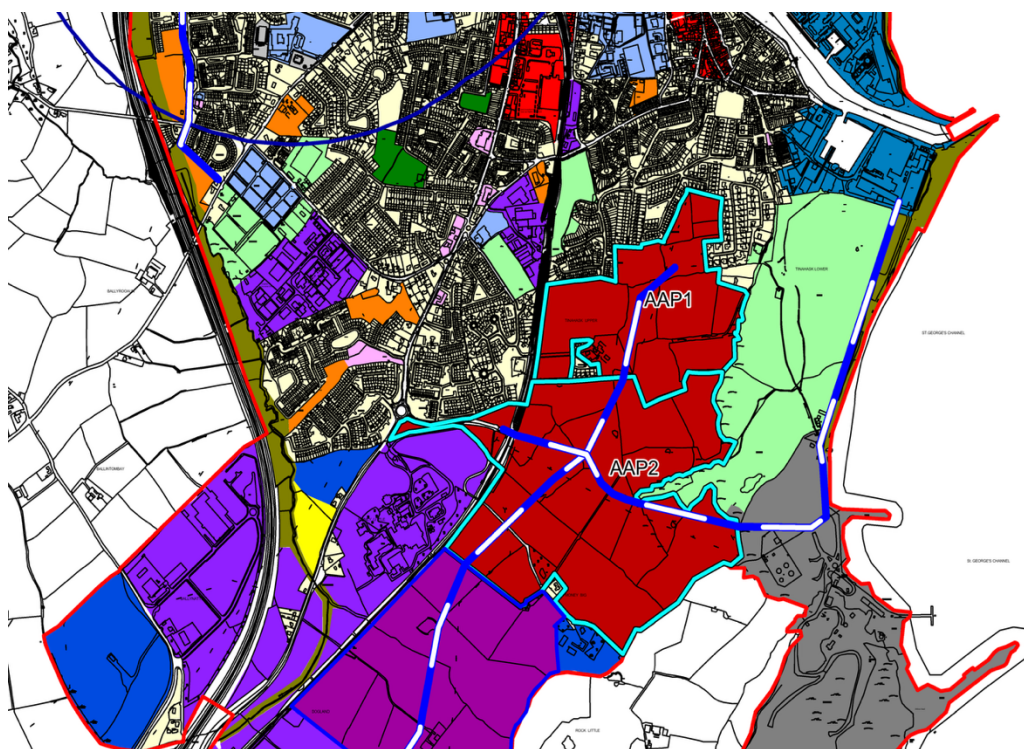


Figure 2: Zoning of the site (Arklow Local Area Plan 2018-2024).

As noted previously, this site recently was successful in gaining Planning Permission under Reg. Ref: 24325 for a *“Large-Scale Residential Development.: Construction of 476 no. residential units, Communal open space associated with the proposed apartment/duplex units will be provided in the form of landscaped areas located in the vicinity of the apartment units. Public open space in the form of 13 no. local parks. All internal residential access roads and cyclist/ pedestrian paths serving the proposed*

development. Provision of 930 no. car parking spaces across the development site and 400 no. bicycle parking spaces for residents of the proposed apartments/duplex units. 37 no. visitor bicycle parking spaces are provided throughout the development site. Provision of a new public park.. Construction of a three-storey mixed use building which will consist of 2 no. Retail units at ground floor level, a community centre and office space at first floor level and the previously mentioned 2 no. two bed-bedroom apartment and 2 no. three bedroom at second floor level. 48 no. car parking spaces & 20 bicycle parking spaces are also proposed for this building. Construction of a two storey Childcare Facility. All associated site development works, services provision, infrastructural and drainage works, surface water attenuation & natural attenuation systems, connection to public services and utilities, provision of ESB substation.

Figure 3 below shows the approved site layout plan which features a total of 476 residential units, three-storey mixed-use building containing two retail units, a community centre, office space, and four apartments, as well as a two-storey childcare facility. Construction of internal access roads, pedestrian walkways, cycle paths, a section of the Port Access Road, and upgrade works to the existing railway bridge to provide vehicular access. Vehicular, pedestrian, and cycle access routes to community and education lands.

Public and communal open spaces form part of the permission, including 13 local pocket parks, a large public park, landscaped communal areas, play spaces, walkways, and a playing pitch. Parking provision includes 930 car parking spaces, 400 resident bicycle parking spaces, 37 visitor bicycle parking spaces, and an additional 48 car parking spaces and 20 bicycle parking spaces associated with the mixed-use building. Associated infrastructure works such as drainage systems, surface water attenuation areas, utility connections, ESB substations, bin and bicycle stores, public lighting, landscaping, and boundary treatments.



Figure 3: Permitted Site Layout Masterplan. Source: WCC Reg Ref 24325.

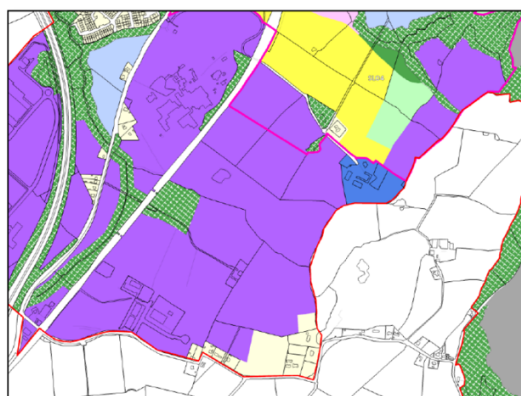
4.2 Material Amendment 27

With regards to Material Amendment 27, this MA directly affect our clients interest lands. The extent of the proposed material amendment is:

“Amend lands at Money Big as follows:

- *Change c. 2.5ha from ‘OS2 – Natural Areas’ to ‘E – Employment’*
- *Exclude c. 6.1ha of Employment ‘E’ zoned land from SLO4*

Change from:



Change to:

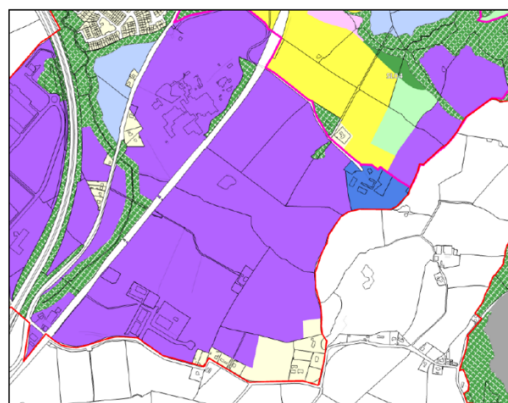


Figure 4: Zoning changes proposed under MA27. *Source: Proposed Variation No.6 to the Wicklow County Development Plan 2022 – 2028, Wicklow County Council.*

The extant permission on the lands at Money Big Tinahisk is perfectly implementable, given it was granted for a duration of 5 years on the 21 of January 2025. **The proposed changes shown in MA no.27 however do not align with the permitted development on the lands.**

Figure 5 below shows the permitted developments zoning as per planning Reg Ref. 24325. The amendment application will make no changes in regards to the permitted area of community or residential use granted under the previous permission.

It is respectfully submitted that proposed Material Alteration no. 27 should take the opportunity now to amend the boundary between the residential, open space and community lands so that it is reflective and consistent with the extant planning permission reg. ref. 24325.

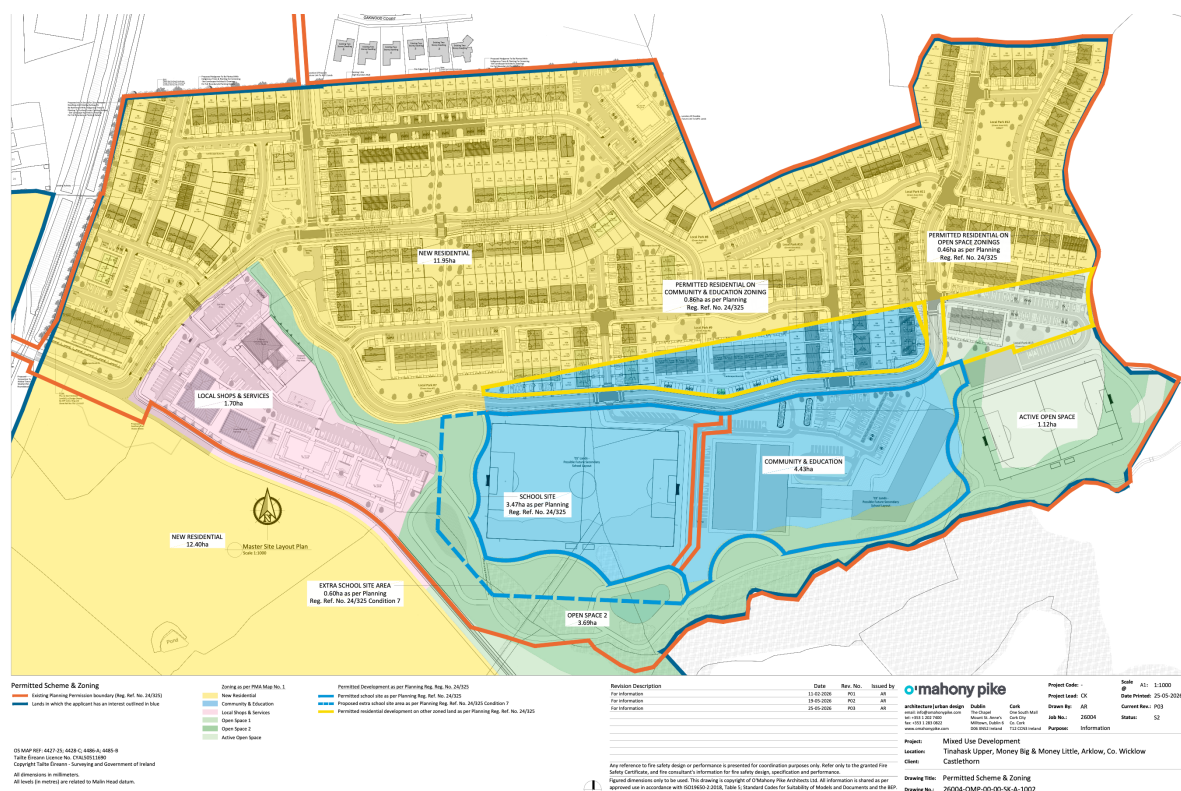


Figure 5: Tinahisk Lands subject to Castlethorn interest. *Source: Map prepared by OMP Architects (see appendix).*

As can be seen above in figure 5 the following zoning anomalies would arise between the current grant of permission on site and proposed MA27:

- 0.86ha of previously permitted residential uses (Reg Ref: 24/325) would be located on community and education zoning
- 0.46ha of previously permitted residential uses (Reg Ref: 24/325) would be located on open space zoning
- 0.60ha of previously permitted open space zoning is required to accommodate an enlarged school site, per condition 7 of Reg Ref: 24/325.

The preparation of the Arklow Local Planning Framework is welcomed by our client Castlethorn, as a well-established and experienced developer with significant landholdings within the LPF boundary area and we note previous references to the consented scheme on this lands by the Planning Authority which our client intends to implement subject to modest amendments.

However, our client has concerns regarding the matters raised in this submission, specifically in relation to Proposed Material Alteration No. 27, insofar as it relates to the amendment of the boundary associated with our client's land interests, in that it does not address and regularise the inconsistency between the Draft Local Planning Framework and the extant permitted development on the lands.

While it is acknowledged that submissions at this stage are generally confined to the proposed alterations, this request is not intended to reopen or amend the wider zoning strategy for the lands. This submission seeks the Planning Authority's consideration of a technical mapping clarification, to ensure consistency between the zoning layout and the extant permitted development on the lands at Tinahisk.

The basis for this request is that the boundary changes proposed by MA no.27 does not fully align with the permitted scheme on the site, specifically where the approved layout already departs from the

precise zoning boundary. This proposed change creates unnecessary ambiguity for the development of the site.

We respectfully request that the planning authority consider an administrative mapping correction to the boundary of the lands. We also note that the adjustment would not extend the settlement boundary, introduce a new development or increase the overall quantum of development beyond what is already permitted on the lands. It would simply ensure that the boundary of the SL04 lands accurately reflects the extant planning permission.

5 CONCLUSION

Castlethorn welcomes the preparation of the Arklow Local Planning Framework and supports Wicklow County Council's objective of establishing a clear, robust and deliverable planning framework for the future growth of Arklow. Castlethorn has a significant land interest within the LPF area and remains committed to the timely delivery of much-needed housing, community facilities, open space and associated infrastructure on these lands.

The lands benefit from an extant permission for a substantial residential-led development, including, community and childcare provision, public open space, local services and supporting infrastructure. It is therefore imperative that the land-use zoning within the emerging framework accurately reflects the permitted development and does not introduce unnecessary ambiguity at development-management stage.

As currently presented, the proposed mapping would create an inconsistency between the emerging planning framework and the extant permission. This inconsistency is capable of straightforward resolution through a minor administrative mapping correction. Such a correction would not extend the settlement boundary, introduce a new development area, increase the permitted quantum of development, or reduce the provision of community facilities or public open space. It would ensure that the planning framework is internally consistent, reflects the established planning history of the lands, and supports the orderly and coherent implementation of development already permitted by the Planning Authority.

We therefore respectfully request that Wicklow County Council amend the relevant mapping, so that the final Arklow Local Planning Framework accurately reflects the extant permission on the lands and provides a clear, consistent and deliverable basis for future development.

STEPHEN LITTLE & ASSOCIATES

29 May 2026

6 APPENDIX

Figure 1 - Tinahisk Lands subject to Castlethorn interest, prepared by O'Mahony Pike Architects Drawing No: 26004-OMP-00-00-DR-A-1100

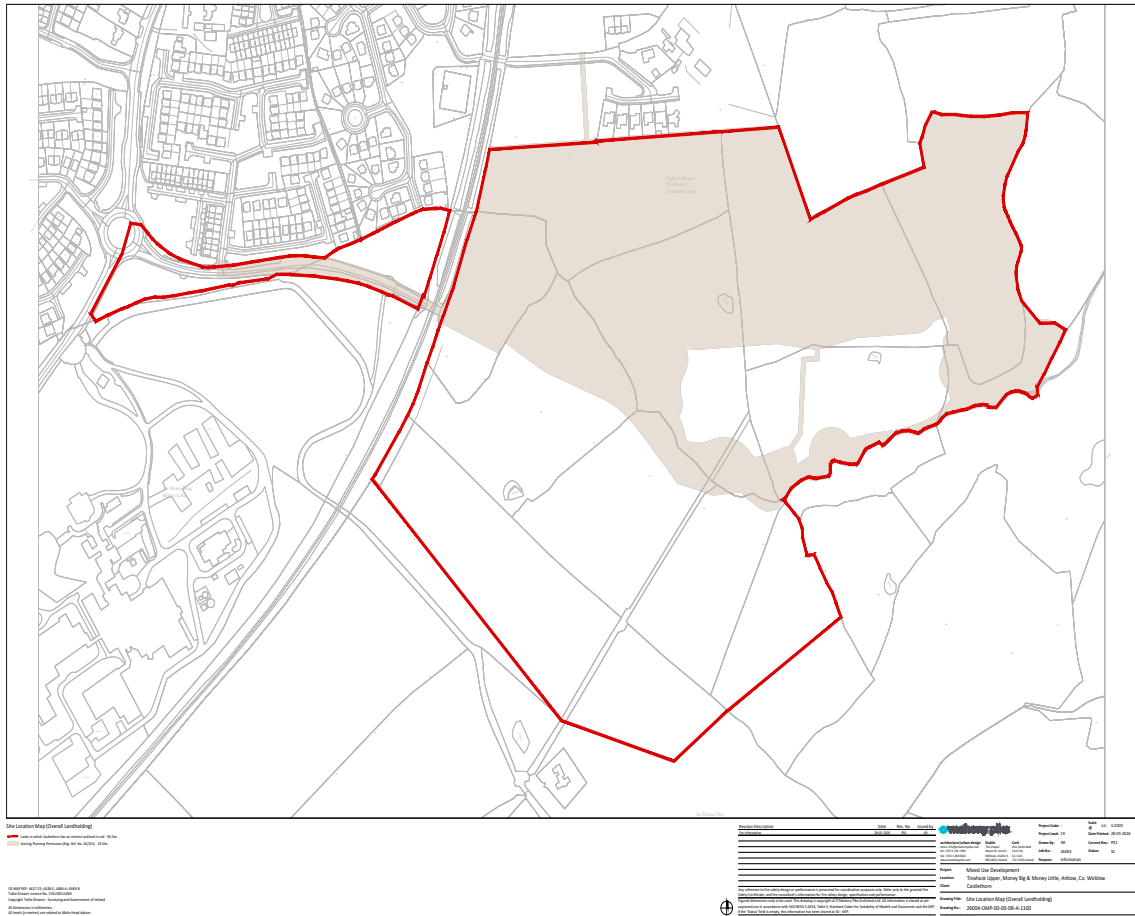


Figure 5 - Permitted Scheme with zoning overlay, prepared by O'Mahony Pike Architects Drawing No: 26004-OMP-00-00-SK-A-1002

