

	Arklow LPF Variation No.5
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Who are you:	Agent
Name:	Arklow Ferrybank Developments
Reference:	ARKLPF-094108
Submission Made	November 11, 2025 9:47 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 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.3 Factors Influencing Future Development Options

Local Planning Framework PART B Settlement Specific Objectives.

- B.2 Arklow Waterfront Zone

Maps:

This submission invites the Council through variation no. 5 to identify our client's land and the wider lands within the northern waterfront zone for predominantly residential development.

Upload a File (optional)

Site Location Plan V2.pdf, 0.21MB

11th November 2025

Variation No.5
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town

Re: Land at Ferrybank, Arklow, Co. Wicklow

Dear Sir or Madam,

This is a submission on behalf of *Arklow Ferrybank Developments*, [REDACTED] in respect of proposed variation no. 5 to the Wicklow County Development Plan 2022 - 2028. Our client is the owner of c. 0.9 hectares of land at North Quay, Ferrybank, Arklow, which is outlined red on the attached plan. This submission invites the Council through variation no. 5 to identify our client's land and the wider lands within the northern waterfront zone for predominantly residential development. More precisely, this submission requests the following changes (**additional text** and ~~deleted text~~) to the draft local framework plan:

At Section A:3.4.1 Northern Waterfront Site (Page 30)

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:

Site C: Located to the south west of the new waste water treatment plant **where planning permission was previously granted for a 5-8 storey apartment building and a restaurant**. Due its location, this would be **most** suited to marine based industry and commercial use with potential for some **to a high intensity** residential development ~~on~~ **with** its southern side benefitting from waterfront views.

At SLO1 NORTHERN WATERFRONT ZONE (Page 103)

Delete the third paragraph as follows:

~~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.~~

And replace it with:

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.

There is overwhelming planning policy support from national to local level to provide for a predominantly residential development of our client's brownfield site. Taking a top down approach, the National Planning Framework (NPF) National Policy Objective 3 plans for *"approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million"* in the Eastern and Midland Region that includes Arklow. This revised target includes an extra 150,000 above the initial NPF target for this region with revised county specific targets set out in the NPF Implementation: Housing Growth Requirements Guidelines (July 2025). Despite Wicklow being the county with the third highest annual increase in housing units under Appendix 1 of the new NPF Implementation Guidelines, the draft LPF retains the lower housing target for Arklow as set out in the Core Strategy of the development plan.

Further, section 4.5 of the NPF targets 40% of future housing development on infill/brownfield development sites within the built footprint of existing urban areas. This NPF approach to compact urban development is applicable to all scales of settlement, from the largest city, to the smallest village. Our client's site is a brownfield site with the remnants of its industrial past still evident from redundant tanks and buildings on the site. Labelled as Site C as part of the Northern Waterfront Zone, it should be identified for predominantly residential development.

The importance of the redevelopment of brownfield sites is also highlighted in the Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019-2031 (the RSES) which states *"A significant proportion of future urban development should be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth."* Brownfield land such as our client's land, is specifically identified for residential development in the RSES and this should be a priority in the draft LPF to ensure the immediate delivery of much needed residential development in Arklow.

In the County Development Plan, Arklow is a level 3 self-sustaining growth town along with Greystones-Delgany and Blessington and only below Bray and Wicklow-Rathnew in the settlement hierarchy. It is targeted for 25-30% growth with a projected total housing growth of 1,221 units up to 2031. As required by the NPF Implementation: Housing Growth Requirements, the housing targets for county Wicklow will be subject to a review by the Council with increases required to comply with those Guidelines and the new requirement for 50% headroom compared with the previous headroom of 25%.

Consistent with the NPF, zoning principle 1 in the development plan's Core Strategy states *"In cognisance that the potential of town centre regeneration / infill / brownfield sites is difficult to predict, **there shall be no quantitative restriction inferred from this Core Strategy and associated tables on the number of units that may be delivered on town centre regeneration / infill / brownfield sites.**"* The development plan places that emphasis on promoting the compact growth of brownfield sites with no quantitative restriction on the number of residential units.

As stated in the draft LPF, its aim is to focus new residential development into the existing serviced built up envelope of the settlement with the 'Town Centre' (TC) zone, Waterfront Zone (WZ) and the 'Existing Residential' (RE) zone all present significant housing opportunities through densification of the existing built up

area, re-use of derelict or brownfield sites and the development of infill and backland sites. The Council's approach to housing development is also set out in housing objective ARK17 which states:

The priority for housing growth shall be the existing built up area of the settlement, on lands zoned 'town centre', 'waterfront' and 'existing residential'. Development shall extend outwards from the centre of Arklow with undeveloped land closest to the centre and public transport routes given priority. 'Leapfrogging' to peripheral areas shall be strongly resisted. In cognisance that the potential of such regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this LPF or the associated tables on the number of units that may be delivered within the built up envelope of the town.

Again, the waterfront is a priority area and no quantitative restriction is repeated in respect of brownfield sites such as our client's.

Finally, the planning register will confirm that a ten year planning permission (ref. 05610072 also known as P72/2005) on our client's site was previously granted by Wicklow County Council on 17th February 2006 for the following residential development:

"Permission for demolition of existing warehouse and 4 no. storage tanks; construction of new 11,316m² five storey apartment block with eight storey central circular block all with glazed balconies. Accommodation of 118 apartments. 158 ground floor car parking spaces provided to rear of structure and 33 no. provided along North Quay serving restaurant and 25 bicycle spaces. Access provided from Mill Road. All associated landscaping boundary treatments."

That scheme comprised 17 no. 1 bed apartments, 98 no. 2 bed apartments, and 3 no. 3 bed apartments plus a 347 sq.m. restaurant in a five and eight storey high building. With a stated site area of 0.9 ha., the residential density was 131 units per hectare (118/0.9) and the plot ratio (gross floor area/site area) was 1: 1.25. The approved scheme included 191 no. car parking spaces of which 158 no. spaces were securely located within the development and 33 no. spaces along the site frontage at North Quay. It is likely with revised Apartment Guidelines that a residential development of up to 150 no. units is possible for this site.

As stated in the Council's decision, having regard to the nature of the proposed development, the waterfront location of the site and the land use zoning of the site, which is WDZ (Waterfront Development Zone), the predominantly residential proposal would not injure the amenities of the area and would be acceptable in terms of traffic safety and convenience. All of these planning considerations remain unchanged today, so the LPF should explicitly support a predominantly residential development of this site.

There is no planning justification to identify marine based industry and commercial use with only some potential for residential development on our client's site per Section A:3.4.1 of the draft LPF. From national to local level, all statutory planning documents specifically promote compact development on brownfield sites. The draft LPF through ARK17 targets the Waterfront Zone that includes our client's site as "the priority for housing growth" with "no quantitative restriction". Appendix 7 of the LPF confirms that SLO1 lands including our client's site are fully serviced and are immediately available for development. Therefore, having regard to

the range of supporting policy, the fully serviced status of the lands, and to address the acute housing shortage, the Council Members are invited to agree the proposed changes as set out above.

Please acknowledge receipt of this submission and direct all future correspondence to this office.

Yours,



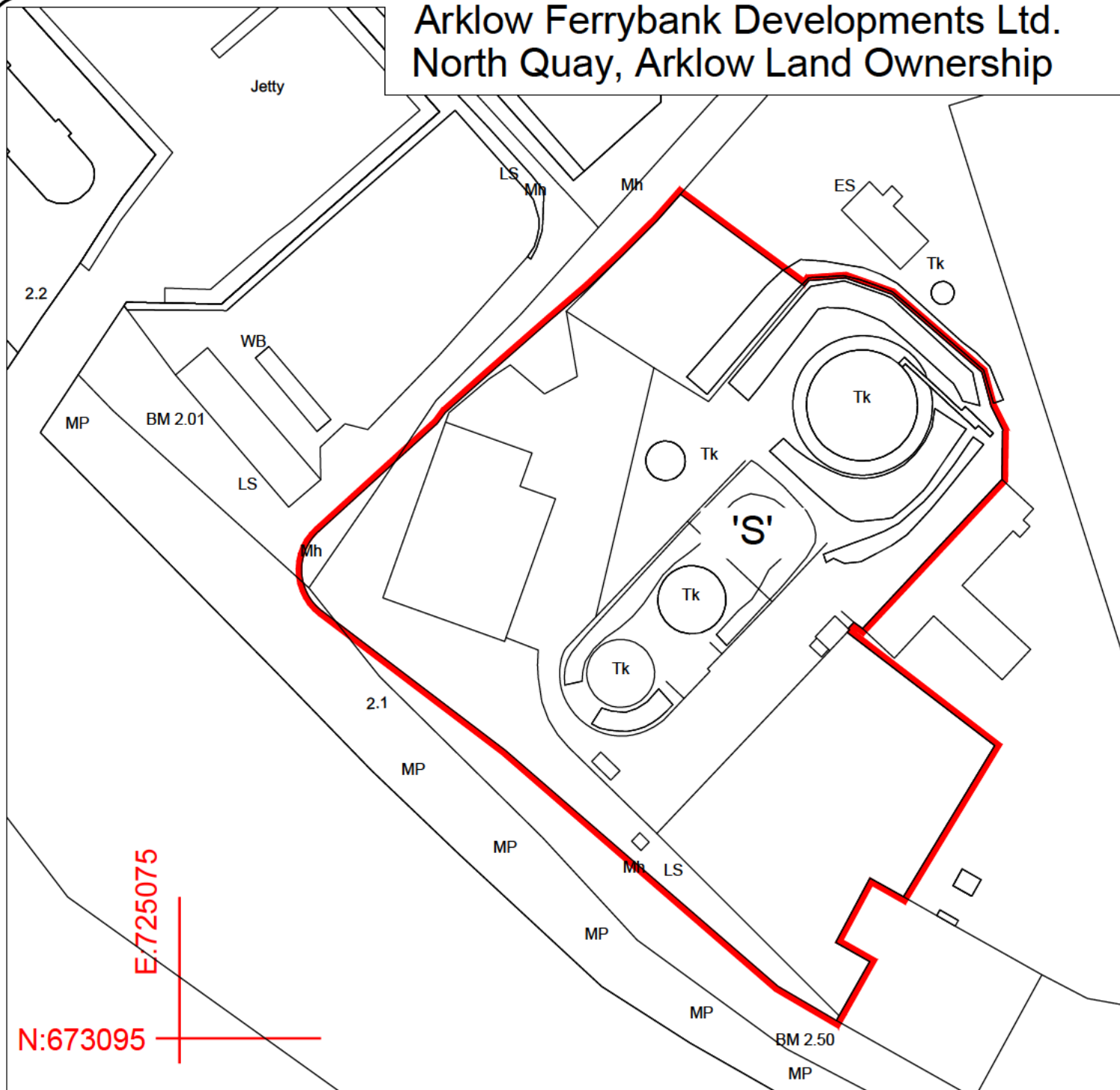
Raymond O'Malley

Kieran O'Malley & Co. Ltd.

ROM: rom

Encl. Site Location Plan

Arklow Ferrybank Developments Ltd. North Quay, Arklow Land Ownership



N:673265
E:725290

Factory

Certified By: _____
Daniel O'Brien BSc. Land Surv Feb 2025

DOB Surveys Ltd..

CHARTERED SURVEYORS

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Arklow Ferrybank Developments Ltd.
North Quay, Arklow Land Ownership
Location: North Quay, Arklow, Co. Wexford

	Hectares	Sq M
Area 'S' outlined in Red - AFD Title	0.999	9991.0

OS. Sheet No. 4428-12,17,18 & C	Drawing No. 24S-085-North Quay-32	
Map Scale: 1:1000	Date: Feb 2025	
Prepared by: D O'Brien	Checked: D O'Brien	

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