

	Arklow LPF Variation No.5
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Who are you:	Agent
Name:	Arklow Properties Limited
Reference:	ARKLPF-090643
Submission Made	November 11, 2025 9:18 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 B Settlement Specific Objectives.

- B.3 Housing Development
- B.10 Specific Local Objectives

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Variation No.5
Administrative Officer
Planning Section
Wicklow County Council
Station Road
Wicklow Town
A67 FW96

11 November 2025

Dear Sir/Madam

**Variation No. 5 Wicklow County Development Plan 2022-2028
Arklow Local Planning Framework**

On behalf of our clients, Arklow Properties Limited [REDACTED], we make this submission on the proposed Variation No. 5 of the County Development Plan - Arklow Local Planning Framework.

Arklow Properties Limited, is the owner of 6.75 hectares of land, known as 'Abbeylands', located to the southeast of the town centre that adjoins existing residential areas to the north.

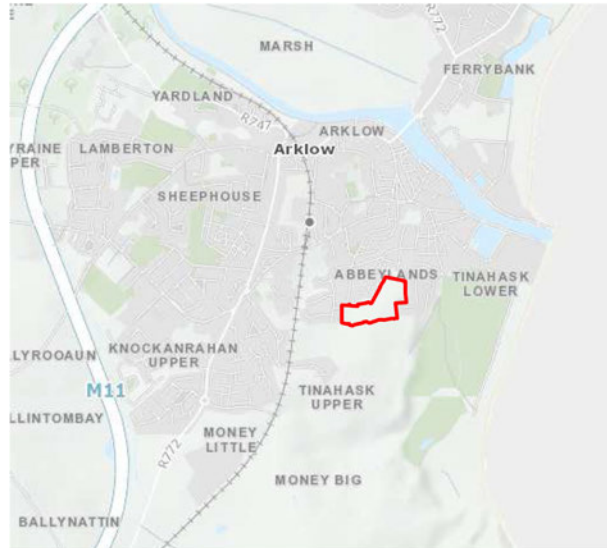


Figure 1: Location of Arklow Properties Limited lands

For the past 18 months, Arklow Properties Limited has actively engaged with the County Council in advancing the development of its lands for residential purposes, including working collaboratively with the County Council and adjoining land owners in the preparation of an Action Area Plan that was approved in March 2025.

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Directors: IM McGrandles, M McGrandles. Registered in Dublin, Ireland. Registered Office: As above.

We note that under the Draft Framework our client's lands are proposed to be zoned objective 'RN1: New residential Priority 1' and located within one of the five Specific Local Objective areas; SLO 3 Abbeylands and Tinahask Upper.

General Observations

Our clients are fully supportive of the overall strategy and the objectives and approach for housing development in the Draft Framework, and more specifically that:

- The lands that are needed to be zoned to meet the current population and housing targets to 2031 will be zoned as 'New Residential Priority 1' lands
- Lands previously zoned for new residential and employment development (identified as Action Area Plans 1- 4 in the 2018 Local Area Plan) fulfil accessibility criteria and are suitable to be continued
- Abbeylands/Tinahask are still considered appropriate to facilitate the future expansion of Arklow
- 'Edge of centre' locations will be considered the priority location for such new greenfield residential development and will generally be zoned as 'New Residential - Priority 1' (zoned RN1)
- The development of zoned land should generally be phased sequentially extending outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference

Observations on SLO3 Abbeylands and Tinahask Upper (pages 109 to 111)

On behalf of our clients we wish to make the following observations on the guidance and objectives for SLO3 in the Draft Framework.

As mentioned above, an Action Area Plan for what are the SLO3 lands was approved in March 2025. It is noted that the land use zoning contained in the Action Area Plan is replicated in Map1: Land Use Zoning Objectives and in Figure B: 10.8: SLO3 Zoning Map on page 109, which given that the Action Area Plan has only recently been approved, is considered appropriate.

A 'Concept Plan' for SLO3 is included in the Draft Framework (Figure B: 10.9, page110). While noting that this Plan is stated to be 'conceptual only' 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'.

In the case of the SLO3 lands, the approved Action Area Plan that is the culmination of extensive engagement with the County Council sets out a comprehensive masterplan for the development of the entire lands including the disposition and location of land uses, the road network and hierarchy, the location of active open space and community uses and the location of potential road, pedestrian and cycle connections to the surrounding area including to the existing residential areas to the north. Given this and that the 'Concept Plan' for SLO3 diverges significantly from the masterplan principles of the Action Area Plan even conceptually, it is submitted that such a Plan is unnecessary.

On the basis of the foregoing, it is requested that the 'SLO3 Concept Plan' (Figure B: 10.9) on page 110 is omitted and replaced with Map 4 Links & Access of the approved Action Area Plan (see Figure 2).

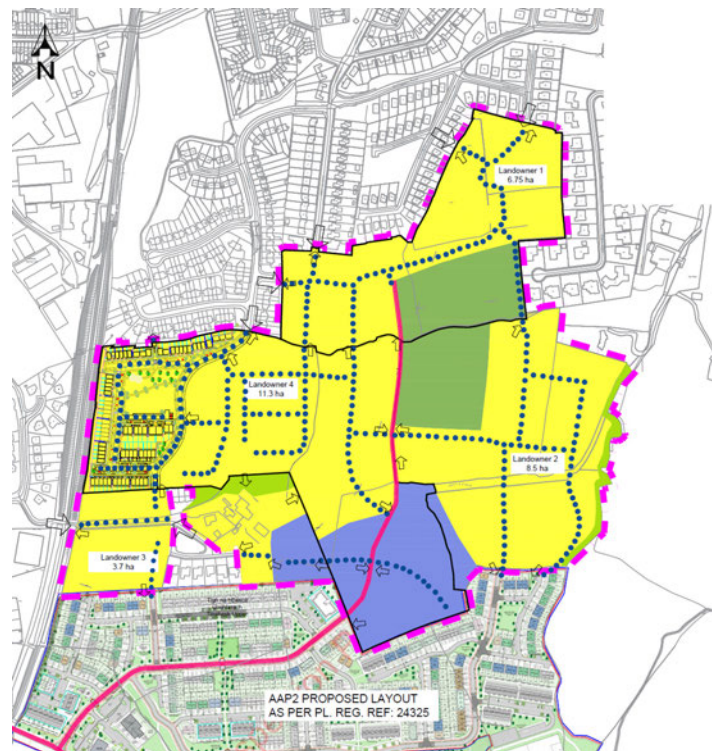


Figure 2: AAP 1 Masterplan. Map 4: Links and Access

In the Draft Framework it is stated that 'masterplan for an entire SLO area may be required to be submitted as part of the first application within an SLO' (page 102). As set out above, the approved Action Area Plan already contains a masterplan for the entire of SLO3 that it would appear this statement does not acknowledge. It is requested that this statement should be amended to do as follows:

"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."

The Draft Framework contains objectives for SLO3 (pages 110 to 111). One of these objectives states that 'no further development shall be permitted on the RN1 lands north of the CE zone until the alignment and design of [the access route from SLO4 through SLO3 and through the CE zoned lands] has been determined and consented'.

It is our client's view that as currently worded this objective is too broad in its scope and lacks precision as to what the development that cannot be undertaken consists of and how the access route will be procured and by whom. On its face, 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 Framework.

As the objective seeks that the alignment of the road ensures that 2 hectares of the CE zoned lands is reserved for a future primary school with suitable accessibility onto it, it is unreasonable that any other development, particularly which is not directly contingent on the alignment of this road into the CE zoned lands, cannot be undertaken.

It is therefore requested that the fifth objective for SLO3 should amended as follows:

"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.

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.

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."

We trust that this submission will be given due consideration in the preparation of the Framework Plan.

Yours faithfully



Ian McGrandles
Director