



Arklow Local Area Plan Submission - Report

Who are you:	Agent
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Email Address:	[REDACTED]
Reference:	ARKLAP-145812
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SUBMISSION

to

**ARKLOW AND ENVIRONS LOCAL AREA PLAN:
PRE-DRAFT PUBLIC CONSULTATION**

concerning lands at

**ARKLOW MARINE SERVICES, NORTH QUAY,
ARKLOW, CO. WICKLOW, Y14 CA39**

Client: Rappel Enterprises Ltd (t/a Arklow Marine Services)

21st March 2024

1.0 INTRODUCTION

David Mulcahy Planning Consultants Ltd have been instructed by **Rappel Enterprises Ltd (t/a Arklow Marine Services)** to prepare a submission to the pre-draft Arklow and Environs Local Area Plan in relation to lands measuring 0.529 hectares at Arklow Marine Services, North Quay, Arklow, Co. Wicklow, Y14 CA39.

The subject site is currently zoned Waterfront. There is a height restriction in the Waterfront Area of only 4 storeys under the Arklow & Environs LAP and a residential unit restriction of 800 units.

The key aims of this submission are as follows:

- To retain the existing Waterfront zoning objective in the new Arklow & Environs LAP.
- To include an objective in the new Arklow & Environs LAP providing for a 6 storey building height limit in place of the current 4 storey building height restriction.
- To increase the 800 units limit in the Waterfront Area in order to reflect the population increase under the 2022 Census and the completion of the waste water treatment system which has significantly increased capacity.

All maps orientated north. All underlined italics are author's emphasis.

2.0 BACKGROUND

2.1 Location

The lands are located on the north side of the harbour in Arklow, Co. Wicklow, adjacent to the existing marina and with frontage onto Mill Road – see fig No.1 below. The site is approximately 900m from Arklow town centre (via the bridge) and 1.44km from Arklow train station.



Fig No.1 Location of subject lands (Source: MyPlan.ie - OSI Licence No.EN 0080915)



Fig No.2 Site context. Red line is indicative only – refers to site location map submitted with the application.

2.2 Description

The subject site (**0.529 hectares**) is currently occupied by Arklow Marine Services, a large building with a floor area of **2,111sq.m** and a maximum height of **15.537m**.



Fig No.3 Satellite Photograph of the subject lands (source: Google Earth Pro, July 2022) with subject site outlined in red (indicative only).



Fig No.4 View of existing building on site as viewed from the west.



Fig No.5 View of existing building on site as viewed from the south.



Fig No.6 images of the existing building on the site as view from the marina to the west.

2.3 Ownership

Rappel Enterprises Ltd (t/a Arklow Marine Services) owns the site in its entirety.

2.4 Adjoining Lands

North West

To the north west of the site there is a residential development – Marina Village – consisting of 3 storey apartment blocks. There is an internal access road separating the boundary of the site from any dwellings.

East

The site to the east is currently vacant. Beyond this Arklow Shipping have recently constructed a large-scale, contemporary building – max. 17.6m high. See photos below.

West

To the west of the site there is a public road (North Quay) with a marina beyond.

South east

There is a public road to the south east (Mill Road). There are no public footpaths or lighting on this road.

2.5 Existing Connections

There is an established road infrastructure to the town centre via Mill Road and also pedestrian connection via the Marina.

2.6 Public Transport

The closest **bus** stop is c.900m from the site at Arklow (Ferrybank EBS, Stop ID: 106121) serving the 2, 133 and 740A buses – providing public transportation to Wexford and Gorey.

Arklow **train** station (serving Dublin) is located approximately 1.4km from the site by foot.

2.7 Arklow Town

The population in Arklow in 2016 was 13,226. It is noted that the population recorded under the 2022 Census is 13,399 which is a notably low growth rate presumably as a result of the need to upgrade the wastewater treatment system capacity in the town.

3.0 PLANNING HISTORY

3.1 Subject Site

Reg. Ref. 05/610115

Permission granted for demolition of existing structures and construction of **2 no. 5 storey blocks comprising of 8 retail units and 50 residential units**, an on-site wastewater treatment facility and ancillary parking and all associated site works.

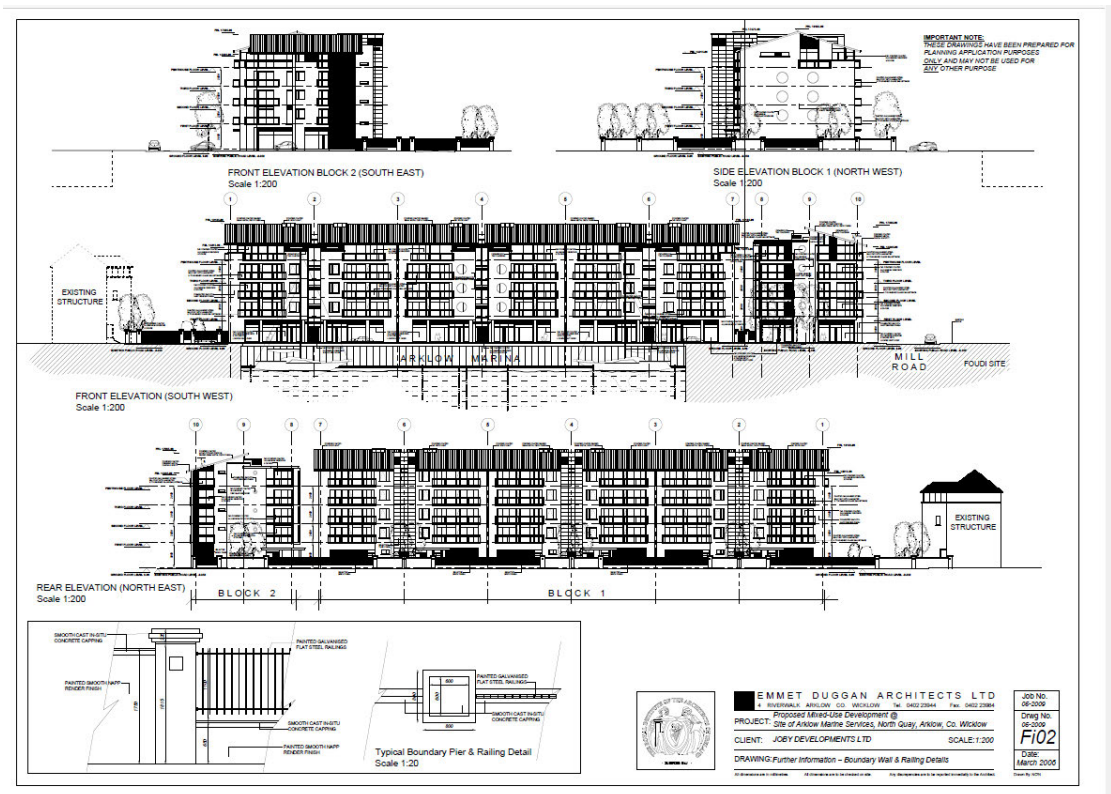


Fig No.7 Elevation drawings submitted with the application under 05/610115

Reg. Ref. 15/857

Time extension was granted for PRR 05/610115 (for demolition of existing structures and construction of 2 no. 5 storey blocks comprising of 8 retail units and 50 residential units, an on-site wastewater treatment facility and ancillary parking and all associated site works).

This permission was **not implemented**. The permission has expired.

3.3 Reg. Ref. 19/1272

Applicant	Rappel Enterprises Ltd
Description	entrance onto North Quay / Marina Road to the rear of their existing premises and all associated site works
Decision	Grant, March 19, 2020

3.4 Arklow Shipping Site – to north west of site

Notification to grant permission for demolition of 3 storey office and **construct 5 storey apartment block** (34 apartments) at North Quay, Arklow (0.19ha site) on lands zoned WZ. This decision to grant permission is on appeal. No decision has been made at the time of writing.



Fig No.8 3-D CGI image and map submitted with the application.

3.5 Wastewater Treatment Plant

Bord Pleanála Case reference: PA27.302556

Construction of a new wastewater treatment plant, interceptor sewers including storm water overflows and stormwater storage, sea outfall pipelines, and an upgrade to a section of the coastal revetment all in the townlands of Arklow, Tinahask Lower and Ferrybank, County Wicklow.

Decision	Grant Perm. w Conditions
Date	01/08/2019
Applicant	Irish Water

This permission was implemented – currently under construction due to be completed 2025.

4.0 NATIONAL & REGIONAL PLANNING CONTEXT

4.1 National

4.1.1 Housing For All - a New Housing Plan for Ireland, 2021

The policy has four pathways to achieving housing for all:

1. supporting home ownership and increasing affordability
2. eradicating homelessness, increasing social housing delivery and supporting social inclusion
3. **increasing new housing supply**
4. addressing vacancy and efficient use of existing stock

4.1.2 National Planning Framework ('NPF') 2040

The NPF states that it *“targets a significant proportion of future urban development on **infill/brownfield development sites within the built footprint of existing urban areas**. This is applicable to all scales of settlement, from the largest city, to the smallest village”*.

National Policy Objective 3a

States that it is a national policy objective to *“deliver at least 40% of all new homes nationally within the built-up envelope of existing urban settlements”*.

4.1.3 Sustainable and Compact Settlements Guidelines for Planning Authorities, 2024 ('SCS Guidelines')

The Guidelines provide for different densities to respond to settlement size, greater flexibility in residential design standards, setting national standards that support innovation in housing design and a greater range of house types, and more compact own-door housing as an alternative to apartment development. This in turn supports higher densities for own door housing schemes.

The policies and objectives are intended as a tool to guide the appropriate scale of development at different locations, rather than as a prescriptive methodology.

4.1.5 Sustainable Urban Housing: Design Standards for New Apartments; Guidelines for Planning Authorities (2020)

Location

Section 2.0 of the Guidelines note that *“Increased housing supply must include a dramatic increase in the provision of apartment development”*

and, *“In general terms, apartment are most appropriately located within urban areas”*.

4.1.6 Urban Development and Building Heights Guidelines for Planning Authorities August 2018

The guidelines note that: -

Reflecting the National Planning Framework strategic outcomes in relation to compact urban growth, the Government considers that there is:-

*“significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by **building up and consolidating the development of our existing urban areas**”* – emphasis added.

Securing compact and sustainable urban growth means *“**focusing on reusing previously developed ‘brownfield’ land, building up infill sites** (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban locations, particularly those served by good public transport and supporting services, including employment opportunities”* – emphasis added.

Development Management Principles

*3.1 In relation to the assessment of individual planning applications and appeals, **it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility.***

4.2 Regional

4.2.1 Regional Spatial and Economic Strategy for the Eastern and Midland Region, ('RSES') 2019 - 2031

Compact growth and Urban regeneration

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens (NSO 1).

5.0 CONSISTENCY WITH WICKLOW COUNTY DEVELOPMENT PLAN 2022-28

5.1 Core Strategy

Arklow is identified as a Self-Sustaining Growth Town (level 3 in the Wicklow Settlement Hierarchy)

Section 6.3.5

"Apartments will be considered favourably in the Key Towns and the Self-Sustaining Growth Towns. High quality smaller scale apartment development will be considered in the Self-Sustaining Towns and rural towns provided that adequate services and amenities are in place to serve the development including high quality public open space".

CPO 6.28 Apartments generally will only be permitted in settlements Levels 1 to 6 and in accordance with the location requirements set out in Section 2.4 of the Design Standards for New Apartments, Guidelines for Planning Authorities (2020). All apartment development should be served by high quality usable open space.

Arklow is a Level 3 town.

6.0 ARKLOW & ENVIRONS LOCAL AREA PLAN 2018 ('AELAP')

6.1 Waterfront Area

The waterfront area (WZ zone), given the large blocks of land available, the proximity to the town centre, amenities, river and sea and the overall attractiveness of the area, also **has significant potential for residential development.** (pg.19).

"There could be c.11ha of vacant lands/buildings available in the waterfront area and a further 8.5ha of underutilised lands/buildings that may be available for redevelopment. Facilitating a relatively high density, assuming a plot ratio of 2.5, this area could have capacity for 4,800+ units. However it is considered somewhat unrealistic to encourage this number of apartments here, hence for this LAP, and given the existing employment uses, and the amenity/leisure potential of some of these lands, this will be **reduced to 800 units**" (pg.32).

6.4 Waterfront

Arklow Waterfront Strategy Objectives

WZ1 To **support in-depth development of the Waterfront zone (WZ), for a mix of residential, commercial, employment, leisure and tourism uses.** Applications for the development of such lands shall include a detailed survey of the existing site conditions, proposals for demolition and remediation of previous site activities and a management plan for the disposal of such materials.

WZ2 In the Waterfront Zone **to allow for high-density development** (up to a plot ratio of (2.5:1) **and up to 4 storeys in height** along water frontages and 3 storeys elsewhere.

Zoning Objective

The site is located within an area zoned Zoning: **(WZ) Waterfront** under the Arklow and Environs Local Area Plan 2018

Objective: 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.**

Description: **To facilitate the provision of high quality new residential developments at appropriate high densities** with excellent layout and design, well linked to the existing town centre, community facilities and water amenities. To provide an appropriate **mix of house sizes, types and tenures** in order to meet household needs and to promote balanced communities. To also facilitate the provision of high quality **new commercial**, maritime, leisure, tourism and amenity uses at a scale that does not undermine the role of the existing Town Centre. To facilitate the extension and continued use of the existing employment, maritime and port uses within the zone. To facilitate the provision of a new Waste Water Treatment Plant with an appropriate high quality architectural design/appearance.

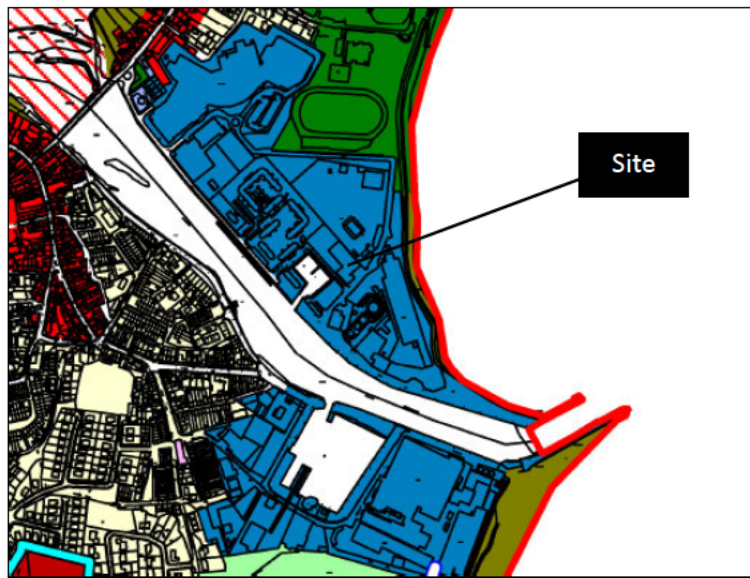


Fig No.9 Extract from zoning map in AELAP with site zoned WZ Waterfront.

7.0 SUBMISSION

The subject land are considered to be ideal for residential development, along with other potential commercial uses. The subject site represents underutilised brownfield lands close to Arklow town centre and public transport which is where national, regional and local planning policy seeks to encourage residential development. The lands are serviceable and 'ready to go'.

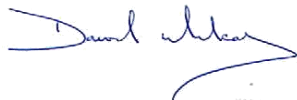
Rappel Enterprises Ltd (t/a Arklow Marine Services) currently have a pre-planning application before the Council for the subject site involving a 5 storey apartment block containing 66 no. apartment units, 2 no. retail units and ancillary development.

The key aims of this submission are as follows:

- To retain the existing Waterfront zoning objective in the new Arklow & Environs LAP.
- To include an objective in the new Arklow & Environs LAP providing for a 6 storey building height limit in place of the current 4 storey building height restriction.
- To increase the 800 units limit in the Waterfront Area in order to reflect the population increase under the 2022 Census and the completion of the waste water treatment system which has significantly increased capacity.

It is submitted that the above aims would fully accord with national planning guidelines, the Wicklow County Development Plan 2022-28 and accord with proper planning and sustainable development of the area.

Signed:



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CHARTERED PLANNING CONSULTANTS