

PROPOSED VARIATION TO THE WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028 (AS VARIED)

Appropriate Assessment Conclusion Statement

Prepared for:
Wicklow County Council



Date: July 2026

Document No:
P23317-FT-EGN-XX-RP-EN-0004

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REVISION CONTROL TABLE, CLIENT, KEYWORDS AND ABSTRACT

User is responsible for Checking the Revision Status of This Document

Rev. No.	Description of Changes	Prepared by:	Checked by:	Approved by:	Date:
1	Final	ESD/KB	RD	BG	29/06/2026

Client: Wicklow County Council

Keywords: Wicklow, Arklow, Appropriate Assessment, AA, Conclusion Statement, Variation, Natura Impact Report, Local Planning Framework, LPF

Abstract: Fehily Timoney and Company is pleased to submit this Appropriate Assessment Conclusion Statement to Wicklow County Council for a Variation to the Wicklow County Development Plan 2022-2028 (as Varied).

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1. INTRODUCTION

Wicklow County Council (WCC) have adopted a Variation to the Wicklow County Development Plan 2022-2028 (WCDP), herein referred to as 'the Variation' or 'the Proposed Variation', under Section 13 of the Planning and Development Act 2000 (as amended). This Variation proposes administrative and technical changes to the WCDP, adds contemporary detail on the planning framework in County Wicklow to Volume 1 of the WCDP, and integrates the Local Planning Framework (LPF) for Arklow into the WCDP. The integration of the Arklow LPF into the WCDP constitutes the substantive component of the Variation.

This is the Appropriate Assessment (AA) Conclusion Statement for the Variation. AA is required by the Habitats Directive, as transposed into Irish legislation by the European Communities (Birds and Natural Habitats) Regulations 2011 (as amended) and the Planning and Development Act (as amended). Section 177V of the Planning and Development Act (as amended) requires that a statement is produced which summarises, inter alia, how environmental considerations have been integrated into the plan or programme subject to AA in order to avoid and prevent adverse effects on the integrity of European sites.

AA is a focused and detailed impact assessment of the implications of a strategic action (such as a plan or programme) or project, alone and in combination with other strategic actions and projects, on the integrity of any European Site in view of its conservation objectives.

AA was undertaken for the Variation. This AA Conclusion Statement documents the AA process applied during the preparation of the Variation and should be read in conjunction with the Variation and associated documents including the Natura Impact Report (NIR) for the Variation.

1.1 Requirements in relation to AA Conclusion Statements

Guidelines entitled 'Appropriate Assessment of Plans and Projects in Ireland Guidance for Planning Authorities' (2009) published by the then named Department of Environment, Heritage and Local Government recommend that plan-making competent authorities include a clear and discrete AA Conclusion Statement as a distinct section in the written statement of the plan separate to the SEA Statement. These guidelines recommend that the following information is included in an AA Conclusion Statement:

- Summary of how the findings of the AA were factored into the plan (provided in Section 2 of this document).
- Reasons for choosing the plan as adopted, in the light of other reasonable alternatives and impacts on European Sites considered as part of the AA process (provided in Section 3 of this document).
- A declaration that the plan as adopted will not have an adverse effect on the integrity of a Natura 2000 site or sites (provided in Section 4 of this document).
- Copy of NIR (the NIR has been published alongside the AA Conclusion Statement and is available for review).



2. HOW THE FINDINGS OF THE AA WERE INTEGRATED INTO THE VARIATION

2.1 Integrated Biodiversity Assessment Approach

The environmental assessment for the Variation undertaken was carried out in accordance with an Integrated Biodiversity Impact Assessment based methodology in accordance with EPA's guidance document entitled 'Final Report: Integrated Biodiversity Impact Assessment, Streamlining AA, SEA and EIA Processes. Best Practice Guidance.' (2012).

The methodology employed facilitated the integration of SEA and AA processes relating to biodiversity impact assessment to ensure the effective and streamlined assessment of biodiversity impacts. The Variation-making, SEA and AA processes - including scoping, baseline evaluation, impact assessment and mitigation/monitoring measure development processes - were carried out concurrently to facilitate holistic and complete assessment of biodiversity impacts. The effective communication and integration of scientific knowledge and analysis between assessments took place. The SEA was suitably informed by the analysis and conclusions in AA.

2.2 Mitigation through Integration of Environmental Considerations into the Variation

The Variation development process was carried out in parallel with the SEA and AA processes. Regular communication and interaction took place between the environmental assessment teams and the competent authority. Environmental considerations that came to light during the SEA and AA processes, including consultation processes, were regularly communicated to the competent authority.

A strong level of 'embedded' environmental mitigation was present in the Variation to mitigate potential adverse effects on European sites. Environmental mitigation measures applicable to the Draft LPF area were also already defined in the preceding WCDP. The embedded mitigation in the Variation, and the relevant mitigatory policy/objectives defined in the WCDP, serve to prevent and minimise potential adverse effects to European sites that may occur during the implementation of the Variation.

Where necessary, additional environmental mitigation, in the form of objective/text additions, were integrated into the Variation to further mitigate potential adverse effects on European sites. This process was carried out in an iterative manner to ensure the best environmental outcomes.

Additional text clarifying the approaches to protecting European sites from adverse effects due to the Variation implementation has been attached to a number of Variation objectives.

Due to the inter-relationship between various environmental components, environmental mitigation measures defined for one component can also serve to benefit other environmental components.

Mitigation measures for avoiding and preventing adverse effects on the integrity of European sites which were embedded in early iterations of the Variation are presented in Table 2-1.

Various mitigation measures which are applicable to the Arklow area have also been defined by WCPD generally. These are presented in Table 2-2.

Additional text clarifying European site protection-related obligations and environmental/ecological enhancement opportunities was attached to various previously defined objectives in the Variation. These text additions are itemised and presented in Table 2-3. This text has been shaped to ensure that environmental considerations are appropriately taken into account during implementation.



Additional Environmental Mitigation Measures (additional objectives) integrated into the Variation, as a result of the AA, to augment European site protection and environmental/ecological enhancement in the Variation are presented in Table 2-4.



Table 2-1: Objectives embedded in the Variation for mitigating adverse effects on European Sites

Ref.	Policy/Objective	Type of Potential Adverse Effect Mitigated
ARK 14	To require any new developments to be suitably set back from the water's edge and to provide public routes and places along waterfronts, to ensure that access to the water, such as steps / slipways / river/ beaches etc. are maintained and improved and to facilitate the development of new opportunities for pedestrian and cycle links from the Waterfront to the town centre.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
ARK 22	To facilitate and support all forms of employment creation on appropriately zoned land in Arklow and to promote the intensification of activities at existing suitable employment locations especially where this can mitigate long distance commuting, subject to the proper planning and sustainable development of the area and compliance with all other objectives of the County Development Plan and this LPF.	• Climate Change
ARK 25	To encourage the redevelopment of brownfield sites for enterprise and employment creation throughout the LPF and to consider allowing 'relaxation' in normal development standards on such sites to promote their redevelopment, where it can be clearly demonstrated that a development of the highest quality, that does not create an adverse or unacceptable working environment or create unacceptable impacts on the built, natural or social environment, will be provided.	• Climate Change
ARK 56	Protect and enhance the character, setting and environmental quality of natural, architectural and archaeological heritage assets, and in particular those features of the natural landscape and built structures that contribute to their special interest. The natural, architectural and archaeological heritage of the area shall be protected in accordance with the objectives set out in the Wicklow County Development Plan.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 57	Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this LPF.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change



Ref.	Policy/Objective	Type of Potential Adverse Effect Mitigated
ARK 58	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.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 61	To protect non-designated sites including identified GI corridors, from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 62	Where relevant, applications for development must demonstrate that the proposal for development would not, individually or cumulatively, affect a water body's ability to meet its objectives under the Water Framework Directive.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 63	To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with ancient woodlands, whether subject to TPO or not, where considered to be viable, safe and in line with sound arboricultural management principles. To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
ARK 64	To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the LPF area. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority).	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Ref.	Policy/Objective	Type of Potential Adverse Effect Mitigated
ARK 67	To require that development within or adjacent to Arklow Town Marsh should be informed by: a) A detailed Ecological Impact Assessment and EIA Screening or EIAR as appropriate. The Ecological Impact Assessment should be informed by detailed desktop study and detailed ecological surveys of the development lands and Arklow Marsh pHNA and provide for the ecological enhancement of the developed lands and the ecological corridors. b) A detailed hydrological impact assessment to assess the potential impacts to groundwater both in terms of groundwater quality and quantity and groundwater flow pathways to protect the hydrological regime of the marsh. The hydrological Impact assessment accompanying such developments shall include an assessment of the in-combination assessment of any hydrological impacts in terms of quantity and quality of water with other pressures on the water quantity and quality supporting the marsh e.g. an in-combination assessment with the impact of the Arklow Flood Protection Scheme is required.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
ARK 90	Applications for new developments or significant alterations/extension to existing developments in an area identified as at risk of flooding (Flood Zones A and B) as set out in the SFRA and flood maps appended to this LPF OR in Flood Zone C but within an area: - that is deemed by the Local Authority at any time to be at possible risk of flooding having regard to new information with respect to flood risk in the area that has come to light; or - that is identified as at possible future risk of flooding having regard to climate change scenarios either on Map 4C attached to this LPF or on any future maps prepared by the OPW during the lifetime of the LPF; - shall comply with the 'Justification Test for Development Management', as set out in Box 5.1 of 'The Planning System and Flood Risk Management' Guidelines 2009 (as may be amended, supplemented or replaced during the lifetime of this LPF) and shall be accompanied by a site specific Flood Risk Assessment. Site Specific Flood Risk Assessments shall be in accordance with the requirements set out in the Flood Risk Management Guidelines and the LPF SFRA.	• Climate Change
ARK 95	Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system;	• Loss/Reduction of Habitat Area • Disturbance to key species • Changes of Indicators of Conservation Value • Climate Change



Table 2-2: Policies and Objectives in the WCDP for mitigating adverse effects on European Sites

Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 13.1	To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Document No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 13.2	To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent storage and disposal systems in the vicinity of natural water bodies or development that would exacerbate existing underlying water contamination.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 13.3	To minimise alterations or interference with river stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 25m along watercourses should be provided (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 13.4	To ensure that any development or activity with the potential to impact on ground water has regard to the GSI Groundwater Protection Scheme (see Map 17.06 Groundwater Vulnerability).	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 13.5	To ensure compliance with and to implement the provisions of the Nitrates Directive in so far as it falls within the remit of the Council to do so	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 13.20	Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 13.21	Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Changes of Indicators of Conservation Value • Climate Change
CPO 13.22	To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Changes of Indicators of Conservation Value • Climate Change
CPO 13.14	To require all new developments to integrate water demand reduction designs and technologies in all aspects of the development including but not limited to: § Installation of water efficient equipment; § Provision of dual flush toilets, cistern bags or other similar technologies; § Construction of grey water systems to allow for the re-use of wastewater from sinks, shower drains or washing machines; § Provision of rainwater harvesting equipment; § The use of low maintenance plants in the design of landscaping;	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 13.9	To protect existing and potential water resources of the County, in accordance with the EU Water Framework Directive, the River Basin Management Plans, the Groundwater Protection Scheme and source protection plans for public water supplies.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 14.01	To support the implementation of recommendations in the OPW Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 14.10	To prohibit development in river flood plains or other areas known to provide natural attenuation for floodwaters except where the development can clearly be justified with the Flood Risk Management Guidelines 'Justification Test'.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 14.13	Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.	• Loss/Reduction of Habitat Area • Changes of Indicators of Conservation Value • Climate Change
CPO 14.15	To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.	• Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 14.16	For developments adjacent to all watercourses or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be set back from the edge of the watercourse in accordance with the guidelines in 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 15.1	To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site.	• Changes of Indicators of Conservation Value • Climate Change



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 15.9	To regulate and control activities likely to give rise to emissions to air (other than those activities which are regulated by the EPA).	• Disturbance to key species • Changes of Indicators of Conservation Value • Climate Change
CPO 15.10	To require proposals for new developments with the potential for the accidental release of chemicals or dust generation, to submit and have approved by the Local Authority construction and or operation management plans to control such emissions.	• Disturbance to key species • Changes of Indicators of Conservation Value • Climate Change
CPO 15.11	To require activities likely to give rise to air emissions to implement measures to control such emissions, to undertake air quality monitoring and to provide an annual air quality audit.	• Disturbance to key species • Changes of Indicators of Conservation Value • Climate Change
CPO 15.13	To enforce, where applicable, the provisions of the Environmental Protection Agency (EPA) Acts 1992 and 2003, and EPA Noise Regulations 2006.	• Disturbance to key species • Changes of Indicators of Conservation Value
CPO 15.14	To regulate and control activities likely to give rise to excessive noise (other than those activities which are regulated by the EPA).	• Disturbance to key species • Changes of Indicators of Conservation Value
CPO 15.15	To require proposals for new developments with the potential to create excessive noise to prepare a construction and/or operation management plans to control such emissions.	• Disturbance to key species • Changes of Indicators of Conservation Value
CPO 15.16	To require activities likely to give rise to excessive noise to install noise mitigation measures to undertake noise monitoring and to provide an annual monitoring audit.	• Disturbance to key species • Changes of Indicators of Conservation Value
CPO 15.17	To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting the amenities of nearby properties, traffic and wildlife.	• Disturbance to key species • Changes of Indicators of Conservation Value



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 15.18	To require proposals for new developments with the potential to create light pollution or light impacts on adjacent residences to mitigate impacts, in accordance with the Development & Design Standards set out in this plan.	• Disturbance to key species • Changes of Indicators of Conservation Value
CPO 15.20	To require the design and implementation of a hierarchy of light intensity zones in development schemes to ensure that environmental impact is minimised as far as possible particularly in areas proximate to ecological corridors	• Disturbance to key species • Changes of Indicators of Conservation Value
CPO 17.4	To contribute, as appropriate, towards the protection of designated ecological sites including Special Areas of Conservation (SACs) and Special Protection Areas (SPAs); Wildlife Sites (including proposed Natural Heritage Areas); Salmonid Waters; Flora Protection Order sites; Wildfowl Sanctuaries (see S.I. 192 of 1979); Freshwater Pearl Mussel catchments; and Tree Preservation Orders (TPOs). To contribute towards compliance with relevant EU Environmental Directives and applicable National Legislation, Policies, Plans and Guidelines, including but not limited to the following and any updated/superseding documents: - EU Directives, including the Habitats Directive (92/43/EEC, as amended)6, the Birds Directive (2009/147/EC)7, the Environmental Liability Directive (2004/35/EC)8, the Environmental Impact Assessment Directive (2011/92/EU, as amended), the Water Framework Directive (2000/60/EC), EU Groundwater Directive (2006/118/EC) and the Strategic Environmental Assessment Directive (2001/42/EC); EU 'Guidance on integrating ecosystems and their services into decision-making' (European Commission 2019); - National legislation, including the Wildlife Acts 1976 and 2010 (as amended), European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018, the Wildlife (Amendment) Act 2000, the European Union (Water Policy) Regulations 2003 (as amended), the Planning and Development Act 2000 (as amended), the European Communities (Birds and Natural Habitats) Regulations 2011 (SI No. 477 of 2011), the European Communities (Environmental Liability) Regulations 2008 (as amended)10 and the Flora Protection order 2015; - National policy guidelines (including any clarifying circulars or superseding versions of same), including 'Guidelines for Planning Authorities and An Bord Pleanála on carrying out Environmental Impact Assessment' (2018), 'Guidance for Consent Authorities regarding Sub-Threshold Development' (2003), 'Tree Preservation Guidelines', 'Landscape and Landscape Assessment' (draft 2000), 'Appropriate Assessment Guidance' (2010); - Catchment and water resource management plans, including the National River Basin Management Plan 2018-2021 (including any superseding versions of same); - Biodiversity plans and guidelines, including National Biodiversity Action Plan 2017-2021 (including any superseding versions of same) and the County Wicklow Biodiversity Action Plan; - Ireland's Environment – An Integrated Assessment 2020 (EPA), including any superseding versions of same), and to make provision where appropriate to address the report's goals and challenges.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 17.5	Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 17.6	Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 17.7	To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites in Wicklow	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 17.8	Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 17.12	To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 17.14	Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan 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.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 17.16	Require pollinator friendly landscape management and planting within new developments and on Council owned land.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 17.17	Work with statutory authorities to prevent and control the spread of invasive plant and animal species and require, where appropriate Invasive Species Management Plans to be prepared as part of the development management process where necessary.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 17.24	To ensure and support the implementation of the EU Groundwater Directive and the EU Water Framework Directive and associated River Basin and Sub-Basin Management Plans and Blue Dot Catchment Programme, to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality. The Council will also have cognisance of, where relevant, the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 17.25	Ensure that floodplains and wetlands are retained for their biodiversity and ecosystems services value and resist development and activities that would interfere with the natural water cycle to a degree that would interfere with the survival and stability of these natural habitats.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 17.26	Protect rivers, streams and other water courses by avoiding interference with river stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to 'Planning for Watercourses in the Urban Environment' by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 18.3	New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO18.8	To require the integration of Green Infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 19.8	To protect the character and visual potential of the coast and conserve the character and quality of seascapes.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 19.11	To protect both public and private investment by prohibiting any new building or development (including caravans and temporary dwellings) within 100m of 'soft shorelines' i.e. shorelines that are prone to erosion, unless it can be objectively established based on the best scientific information at the time of the application, that the likelihood of erosion at a specific location is minimal taking into account, inter alia, any impacts.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO 19.13	Projects giving rise to adverse effects on the integrity of European sites (cumulatively, directly or indirectly) arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall not be permitted on the basis of this plan ⁵ . Ensure that development proposals, contribute as appropriate towards the protection and where possible enhancement of the ecological coherence of the European Site network and encourage the retention and management of landscape features that are of major importance for wild fauna and flora as per Article 10 of the EU Habitats Directive. All projects and plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
CPO 19.14	To ensure that there is no removal of sand dunes, beach sands or gravels through application of the provisions of the Foreshore (Amendment) Act (1992), in close co-operation with the Department of the Environment, Climate and Communications and the Department of Agriculture, Food and the Marine.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 16.24	Proposals for the undergrounding of cables should demonstrate that environmental impacts including the following are minimised: § Habitat loss as a result of removal of field boundaries and hedgerows by topsoil stripping; § Short to medium term impacts on the landscape where, for example, hedgerows are encountered; § Impacts on underground archaeology; § Impacts on soil structure and drainage; and § Impacts on surface waters as a result of sedimentation.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 11.50	Where relevant, the Council and those receiving permission for development under the plan, shall manage any increase in visitor numbers and/or any change in visitor behaviour in order to avoid significant environmental effects, including loss of habitat and disturbance. Management measures may include ensuring that new projects and activities are a suitable distance from ecological sensitivities; visitor/habitat management plans will be required for proposed projects as relevant and appropriate.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
CPO 11.51	Ensure the potential environmental effects of a likely increase in tourists/tourism-related traffic volumes in particular locations/along particular routes shall be considered and mitigated as appropriate. Such a consideration should include potential impacts on existing infrastructure (including drinking water, wastewater, waste and transport) resulting from tourism proposals.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change



Policy / Objective Reference	Policy / Objective	Type of Potential Adverse Effect Mitigated
CPO14.03	To recognise the concept of coastal evolution and fluvial flooding as part of our dynamic physical environment, and adopt an adaptive approach to working with these natural processes. The focus of a flood management strategy should not solely be driven by conservation of existing lands; it should recognise that marshes, mud flats and other associated eco-systems evolve and degenerate, and appropriate consideration should be given to the realignment of defenses and use of managed retreat and sacrificial flood protection lands to maintain such habitats as part of an overall strategy.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change

Table 2-3: Amendments to Objectives integrated into the Variation

Reference	Objective	Amendment (shown in blue italics)	Type of Potential Adverse Effect Mitigated
ARK 8	To support in-depth development of the Waterfront zone (WZ), north and south, for a mix of residential, commercial, employment, leisure and tourism uses in accordance with the development objectives for SLO1 and SLO2. 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.	To support in-depth development of the Waterfront Zone (WZ), north and south, for a mix of residential, commercial, employment, leisure and tourism uses in accordance with the development objectives for SLO1 and SLO2, <i>having appropriate regard to environmental and ecological sensitivities associated with this coastal location.</i> Applications for the development of such lands <i>(including in particular any development that entails demolition and / or site excavation) shall include appropriate site and ground surveys / investigations / remediation measures / waste management plans as required taking in account current and previous/historic land uses / site activities</i>	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 28	To support and facilitate the development of spin off employment and support infrastructure from the renewable energy sector, including the development of long duration electricity storage, distribution and transmission and/or projects which would further result in the decarbonisation of the energy sector.	To support and facilitate the development of spin off employment and support infrastructure from the renewable energy sector, including the development of long duration electricity storage, distribution and transmission and/or projects which would further result in the decarbonisation of the energy sector.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Reference	Objective	Amendment (shown in blue italics)	Type of Potential Adverse Effect Mitigated
		<i>Ensure such facilities are appropriately located and designed, informed by appropriate environmental/ecological assessment processes and do not result in significant adverse noise or landscape/visual impacts.</i>	
ARK 49	To facilitate and encourage the redevelopment of the public park areas zoned OS1 at Kynock Park, Fernhill/Marian Villas and Churchview as funding becomes available.	To facilitate and encourage the redevelopment of the public park areas zoned OS1 at Kynock Park, Fernhill/Marian Villas and Churchview as funding becomes available, <i>whilst ensuring proposals to re-develop the park are appropriately informed by ecological surveying and impact assessment, and do not result in habitat fragmentation or net loss of biodiversity.</i>	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
ARK 50	To facilitate and encourage the development and/or improvement of public sports facilities on the AOS lands to the north and south of Seaview Avenue and at Fernhill/Marian Villas as funding becomes available.	To facilitate and encourage the development and/or improvement of public sports facilities on the AOS lands to the north and south of Seaview Avenue and at Fernhill/Marian Villas as funding becomes available, <i>whilst ensuring proposals to develop lands are appropriately informed by ecological surveying and impact assessment, and do not result in habitat fragmentation or net loss of biodiversity.</i>	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value • Climate Change
ARK 65	To enforce a general presumption against the culverting of watercourses within the LPF area, except where absolutely necessary and justified. Where development is proposed within sites that contain culverted watercourses, proposals should be included to restore or 'daylight' said watercourses with an appropriate riparian zoned in line with CPO 17.26 of the Wicklow County Development Plan.	To enforce a general presumption against the culverting of watercourses within the LPF area, except where absolutely necessary and justified. Where development is proposed within sites that contain culverted watercourses, proposals should be included to restore or 'daylight' said watercourses with an appropriate riparian zoned in line with CPO 17.26 of the Wicklow County Development Plan.	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Reference	Objective	Amendment (shown in blue italics)	Type of Potential Adverse Effect Mitigated
		<i>Any proposal to culvert a watercourse in the LPF area shall be informed by appropriate ecological surveying and ecological impacts, and shall be in line science based good practice relating to the protection of ecology and the environment, including guidance from Inland Fisheries Ireland.</i>	
ARK 74	To overcome overreliance on the Nineteen Arches Bridge and improve pedestrian and cycle connectivity between the north and south of the river, by promoting and supporting the development of; - The Kilbride Pedestrian and Cycling Bridge between the Avoca River Walk and Arklow Town Marsh/Ferrybank, including associated east-west pedestrian links connecting this crossing with Ferrybank / Dublin Road (short/medium term), the River Avoca Industrial Park (long term) and Arklow to Laragh Greenway(long term). - A second pedestrian and cycling bridge between South Quay and North Quay with upgrades to Doyle's lane, serving to connect Arklow Main Street with the Bridgewater Shopping Centre.	To overcome overreliance on the Nineteen Arches Bridge and improve pedestrian and cycle connectivity between the north and south of the river, by promoting and supporting the development of; - The Kilbride Pedestrian and Cycling Bridge between the Avoca River Walk and Arklow Town Marsh/Ferrybank, including associated east-west pedestrian links connecting this crossing with Ferrybank / Dublin Road (short/medium term), the River Avoca Industrial Park (long term) and Arklow to Laragh Greenway(long term). - A second pedestrian and cycling bridge between South Quay and North Quay with upgrades to Doyle's lane, serving to connect Arklow Main Street with the Bridgewater Shopping Centre. <i>Such development shall be suitably informed by ecological surveying, ecological impact assessment, AA Screening/AA and EIA Screening/EIA, as the case may be, with a view toward avoiding and preventing significant adverse effects on receiving environmental sensitivities. Such development shall be appropriately shaped and guided by environmental and ecological constraints in the receiving environments.</i>	- Loss/Reduction of Habitat Area - Habitat or species fragmentation - Disturbance to key species - Reduction in species density - Changes of Indicators of Conservation Value



Reference	Objective	Amendment (shown in blue italics)	Type of Potential Adverse Effect Mitigated
ARK 89	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. 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 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. 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. <i>The Council will aim to facilitate and promote the carrying out of coastal defence and protection works in accordance with 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.</i>	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 95	Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system;	• Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) and in particular, to ensure that all surface water generated in a new development is disposed of on-site or is attenuated and treated prior to discharge to an approved surface water system; <i>these systems shall be maintained properly in accordance with relevant standards to ensure their continue efficacy.</i> • Developments, including new/expanded developments and any planned improvements to existing urban spaces, shall be designed in accordance with the guidance document "Implementation of Urban Nature-based Solutions: Guidance Document for Planners, Developers and Developer Agents" LAWPRO 2024.	• Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



Table 2-4: New Objectives for the Variation

Reference	Objective	Type of Potential Adverse Effect Mitigated
ARK 59	<i>To ensure development is planned in a manner that has appropriate regard to specific ecological sensitivities associated with the Arklow area, including those associated with the Arklow pNHA, the Avoca River, coastal habitats and species, and sites suitable for wintering birds.</i> <i>In particular, to ensure the protection and where possible the restoration of the biodiversity associated with Avoca River and its riparian (bankside) habitats. Proposals for development at or in the vicinity of the Avoca River should be informed by ecological surveying and ecological impact assessment.</i>	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value
ARK 60	<i>Where necessary, development shall integrate appropriate measures to prevent disturbance and displacement of sensitive bird species (such as Greylag Goose and Gull species) which may utilise grassland, estuarine, coastal and marine habitats in the LPF area.</i> <i>In particular, proposed developments located within or adjacent to I-Webs (wintering bird survey) sites located at the lower reaches of the Avoca River (Site Name: Avoca River/Arklow, Site Code: OT399), Seaview Avenue (Site Name Arklow Main Pond, Site Code: OT099) and Sea Road (Site Name: Caravan Site Pond, Site Code: OT098 shall be suitably informed by:</i> • <i>Ecological surveying, AA Screening/AA and EIA Screening/EIA, as the case may be, with a view toward avoiding and preventing significant adverse effects on receiving environmental sensitivities such as the existing wetland habitat and avian species which forage and roost during the wintering season. Such development shall be appropriately shaped and guided by environmental and ecological constraints in the receiving environments.</i> • <i>Detailed hydrological impact assessment to assess the potential impacts in terms of water quality and quantity and flow pathways to protect the hydrological regime of the wetland habitats. The hydrological impact assessment accompanying such developments shall include an assessment of the in-combination assessment of any hydrological impacts in terms of quantity and quality of water with other pressures on the water quantity and quality supporting these wetlands.</i>	• Loss/Reduction of Habitat Area • Habitat or species fragmentation • Disturbance to key species • Reduction in species density • Changes of Indicators of Conservation Value



3. CONSIDERATION OF ALTERNATIVES

3.1 Introduction

This section provides an overview of reasonable Variation alternatives considered during the Variation-making processes. The environmental effects of reasonable alternative, including effects on biodiversity and European sites, were considered when choosing the preferred Variation.

A range of alternatives to the Variation/LPF were considered during the development of the Variation/LPF.

Iterative communication was held between WCC and environmental assessment teams to identify the various alternative approaches and options being considered to achieve the objectives of the Variation/LPF.

Reasonable alternatives considered were identified. For an alternative to be considered reasonable, it must be practical/functional, realistic and implementable. An evaluation of whether each alternative met these criteria was undertaken, in consideration of the following factors:

- The strategic aim and objectives of the Variation/LPF.
- The geographic scope of the Variation/LPF.
- The actual powers and functions of WCC.
- The genuine ability of the alternative to achieve the Variation/LPF aims and objectives.
- The technical feasibility of the alternative.
- The availability of resources, including financial resources to deliver the Variation/LPF within the required timeframe.
- The policy hierarchy and the parameters placed around the Variation/LPF by higher-level policy.
- The legislative context and the parameters placed around the Variation/LPF by climate action and environmental related legislation.

The toolkit contained in the EPA's guidelines entitled 'Developing and Assessing Alternatives in Strategic Environmental Assessment Good Practice Guidance' (2015) was utilised when identifying reasonable alternatives. The 'Why? What? Where? When?' Model defined in the guidelines were used when framing reasonable alternatives, as shown in Figure 3-1.

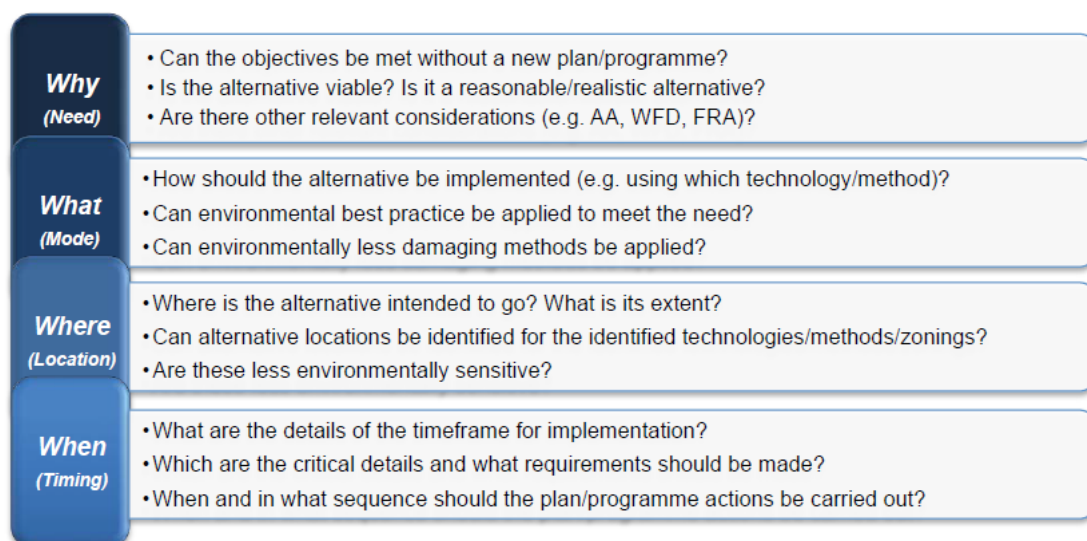


Figure 3-1: 'Why? What? Where? When?' Model for framing alternatives – Adapted from Figure 4.3 Developing and Assessing Alternatives in the Strategic Environmental Assessment Process (EPA, 2015).

3.2 Identification and Description of Reasonable Alternatives

Reasonable alternatives to the Variation were identified as the Variation-making process evolved, having regard to the scope, function and strategic aims and main objectives of the Variation. This process facilitated the accurate identification of reasonable alternatives to the Variation and also suitably informed the Variation-development process, ensuring optimal environmental outcomes. An evaluation of the potential effects of the reasonable alternatives on the baseline environment was carried out in accordance with the SEA Directive and best practice guidelines. A description of these reasonable alternatives and the reasons for selecting these reasonable alternatives are presented in Table 3-1 and Table 3-2.

The reasonable alternatives available for the Variation/LPF were significantly limited by the provisions higher-level planning policy, including those of the National Planning Framework, and the Eastern and Midlands Regional Spatial and Economic Strategy, Ministerial Guidelines; as well as planning policy already defined in WCDP. These documents set out various requirements for the content of the Variation/LPF, including on topics such as population, land use zoning and proper planning and sustainable development. The Variation/LPF must be in compliance with these aforementioned policy documents.

A 'Do-Nothing' or 'Do Minimum' alternative is not a reasonable alternative in this instance given the need to prepare an LPF for the Arklow area.



Table 3-1: Reasonable Alternatives to the Variation

Reasonable Alternative	Description of Reasonable Alternative
Alternative 1: Maximum Environmental Protection	This alternative sets out a development strategy for achieving the maximum level of protection to the receiving environment. The key objectives this alternative sets out to achieve are: • Maximum protection to European Sites and NHAs, including a significant conservation buffer surrounding all sites to enhance the protection of protected sites, in particular Arklow Town Marsh pNHA, which shall remain free of any new development. • Restrict any significant development outwards from the existing built-up area by de-zoning lands currently zoned for new development (including residential), which are more than a 15-minute walk from the town centre and public transport nodes. • Protect all mature trees and hedgerows where they are not on the TPO list. • Increase the protection of sites indicated as being part of Irelands Ancient Woodlands/Glenart Wood. • Maximise protection of all watercourses in accordance with Inland Fisheries Ireland 'Planning for Watercourses in the Urban Environment' 2020 and in particular zone all lands within 50m of watercourses for Natural Areas (OS2) only. • Restrict additional development to Protected Structures, with maintenance proposals considered. • Restrict development at all designated archaeological sites. • Maximise the protection of County Geological Sites within the Local Planning Framework boundary. • Enhance the protection of views and prospects with restricted development within the view/ prospect. • Rezone all lands zoned 'EX – Extractive industry' within the LPF boundary, in favour of land use zonings that may facilitate the rehabilitation of quarry lands. • Rezone all lands identified as 'Local Biodiversity Areas' as Natural Area (OS2) or Open Space (OS1). • Rezone currently undeveloped employment lands in the town to employment special to facilitate the development of renewable energy generation and energy storage from various renewable sources to assist in increasing the share of renewable energy on the grid and in turn assist in decarbonising the national grid building on Arklow's designation as County Wicklow's first decarbonisation zone.



Reasonable Alternative	Description of Reasonable Alternative
Alternative 2: Sustainable Transportation	This alternative sets out a development strategy which focuses on delivering travel solutions that support moving people from the private car to the more sustainable modes of walking, cycling and using public transport. The key objectives this alternative sets out to achieve are: • High density residential zones within 15-minute walking distance of all bus stop areas. • Downzone all undeveloped greenfield land that is not within 15-minute walking distance of the town centre and a public transport node. • Enhanced pedestrian and cycle infrastructure in and around the town centre. • Seek to have a significant reduction, or removal, of through traffic through the town centre, in particular HGV's. • A reallocation of road space in the town centre from car parking to pedestrians and cyclists. • Rationalisation of car parking in the town centre –removal/reduction of on street parking along Main Street with the exception of loading bays and accessible/disabled car parking bays. Increase capacity in in Castle Park Car Park to make up removed spaces along Main Street. • Remove the following two road objectives from the plan: (a) SPAR- Southern Port Access Road and (b) WDR –Western Distributor Road. • Include enhanced pedestrian connections throughout the settlement including the following: • The further enhancement of existing laneways leading off Main Street to enhance connectivity to the waterfront and to services, schools and residential areas to the south and west of the town centre. • Provision of two active travel bridges across the River Avoca enhancing linkages between the town centre, Bridgewater and the existing residential areas and facilities on both sides of the river. • Improve existing pedestrian permeability throughout the settlement and require that all new developments consider pedestrian permeability in their design which connects with existing or possible future pedestrian routes leading to schools, services and the town centre. • Provision of a pedestrian bridge over the train line at Arklow Train Station. • Enhanced cycle routes and connections throughout the settlement in line with the Greater Dublin Area Cycle Network 2022, and where required elsewhere.



Reasonable Alternative	Description of Reasonable Alternative
	• Include a 'Park and Ride' site adjacent to M11 Junction 20 Arklow North. • Delivery of a town bus service for Arklow and its environs to support its population growth while reducing reliance on the private car.
Alternative 3: Compact Growth	This alternative sets out a development strategy which focuses on compact growth focusing within the settlement of Arklow. The key objectives this alternative sets out to achieve are: • Downzone all undeveloped greenfield land (the lands revert to open countryside) beyond the established built-up area boundary, other than those lands which fall within a 15 minute walk of the town centre and/or Arklow Train Station to allow for the consolidation of the existing main built-up area on both sides of the river Avoca. • Zone the lands which fall within the 15 minute walking cordon of the Town Centre and/or Train station, for mixed use, high density residential development. • All Town Centre, Waterfront Zone and Local Shops and Services sites are zoned for high density mixed use. • Infill sites zoned for employment uses within the built-up area are zoned mixed use, high density residential, insofar as would be consistent with core strategy housing targets as set out in the Wicklow County Development Plan 2022-2028.
Alternative 4: Housing Market Driven	This alternative sets out a development strategy which focuses on residential development focusing on phased development of residential zoned land. This alternative has regard to the Core Strategy of the Wicklow County Development Plan 2022-2028 and has regard to the relevant objectives of the County Development Plan 2022-2028. It also has regard to the revised National Planning Framework. The key components of it are described below: • Due to changes to the National Planning Framework, Regional Spatial and Economic Strategy and changes to planning legislation, in order to future proof the Local Planning Framework, this alternative will allow for flexibility in the residential zoning provisions to ensure that the population targets / any revised population targets can be achieved and in the event that unforeseen impediments to the development of certain lands arise.



Reasonable Alternative	Description of Reasonable Alternative
	• Provide enough zoned land to meet the housing needs for 10 years in line with the Core Strategy of the County Development Plan as 'Priority 1' lands. • Provide for 10% extra housing units above that of the Core Strategy on 'Priority 2' on the next best lands. • Provide for an additional 10% extra housing units above that of the Core Strategy and 'Priority 2' lands on 'Priority 3' lands. • Densities of New Residential lands will be set at 20 units to the hectare, generally providing standard 3 and 4 bed family homes, detached and semi- detached, with generous private garden plots. • Each housing development will have a minimum of 20% of the site dedicated to landscaped public open space areas. • New access and distribution roads, throughout the settlements, will be included to serve the car-based occupants of the residential developments. • All serviced land is zoned for residential development. • Community & Education zones, Employment zones, Active Open Space Zones are on the periphery of the residential zoned lands.
Alternative 5: Community Driven	This alternative sets out a development strategy which focuses on healthy communities, where residents have all necessary facilities and services within short walking/cycling distance of their homes. This alternative is consistent with the Core Strategy of the Wicklow County Development Plan 2022-2028 and is consistent with the relevant objectives of the County Development Plan 2022-2028. The key components of it are described below: • Zone extra lands, above the minimum requirement for new schools close to existing and proposed residential areas. • Zone extra lands, above the minimum requirement for recreational/ sports / community facilities are zoned for Tourism / Recreation (TR), Community Education (CE) and Active Open Space (AOS) (e.g. for playing pitches, community halls, theatres, cultural facilities, running tracks, landscaped parks, dog parks, all other recreation/ sports. etc). • New walking routes / cycling routes are designated throughout the settlement, along with 2 new active travel bridges across the Avoca River and at least 1 active travel bridge crossing the railway line which



Reasonable Alternative	Description of Reasonable Alternative
	currently segregates the south side of Arklow. Provision of an elevated active travel board-walk route through or along the edge of the Town Marsh connecting one active travel bridge over the Avoca with Ferrybank. Improve routes to Glenart Forest, the Cliff Walk, the seafront and Arklow South Beach. • Build on the potential of the flood scheme to improve the public realm of the quays and the waterfront zones. • Extra lands are zoned for employment to facilitate people working locally. These will include the development of co working hubs. • Rezone tourism sites on the south side of the town to community use and improve access to and enhance existing tourism facilities including Arklow Caravan Park, The Arklow Bay Hotel, Arklow Marina, the Avoca River and Arklow Beach, Arklow Golf Club and promote further tourism potential building on Arklow's rich industrial and maritime heritage and the proposed Arklow to Shillelagh greenway. • There will be additional policy support and lands zoned for childcare facilities (Crèches, Montessori, playgrounds, etc) throughout the settlement. • There will be additional policy support and lands zoned for healthcare facilities (extra GP's, health centres, dentists, holistic centres, etc) throughout the settlement. • The town centre will be strengthened with more opportunity sites for redevelopment of brownfield sites, removal of HGV's from travelling through the town centre, provision of wider footpaths and pedestrianised public spaces along with improved cycle infrastructure. This will help to improve the retail offer in the area, increase pedestrian footfall, facilitate outdoor dining, etc.
Alternative 6: Extractive Industry & Economy Driven	This alternative sets out a development strategy which focuses on taking advantage of the aggregate quarrying resources available within the Local Planning Framework boundary, and maximising the potential for growth of jobs locally. This alternative is consistent with the Core Strategy of the Wicklow County Development Plan 2022-2028 and is consistent with the relevant objectives of the County Development Plan 2022-2028. The key components of it are described below: • Maximise the capacity of the new waste water treatment system by increasing and maximising all zoned lands.



Reasonable Alternative	Description of Reasonable Alternative
	• All current quarry lands are zoned 'EX – Extractive Industry', i.e Roadstone, to maximise the potential of employment generation from the existing local extractive industry and to facilitate the building of houses and new roads. • Expedite the development of the South Port Access Road (SPAR) to facilitate ease of access for HGV's to and from the Quarry and Arklow Port on South Quay. • Extra lands, above the minimum requirement to meet a 0.7 jobs ratio, are zoned for employment purposes to maximise the potential for resident workers to work in the settlement, maximise the potential for strategic employment uses to relocate to the settlement, and thus reduce commuting times and unemployment. • Extra lands above the minimum requirement to meet the 0.7 jobs ratio, are zoned for employment special type 1 to facilitate the development of renewable energy generation and energy storage from various renewable sources to assist in increasing the share of renewable energy on the grid and in turn assist in decarbonising the national grid. • Extra lands, above the minimum requirement to meet a 0.7 jobs ratio, are zoned for employment special type 2 to facilitate the development of large scale remote storage for the provision or distribution of large amounts of data. • Lands in proximity to public transport are prioritised for employment use to facilitate the sustainable commuting of workers into Arklow. • Regenerate the retail and employment function of Arklow Main Street through the enhancement of the main street and improving connectivity between Bridgewater Shopping Centre and Main Street. • Rezone tourism sites on the south side of the town to employment use and promote, improve access to and enhance existing tourism facilities in the waterfront zone whilst building on the existing amenities of Arklow Caravan Park, The Arklow Bay Hotel, Arklow, Marina, the Avoca River, Arklow Beach, Arklow Golf Club, Arklow's rich industrial and maritime heritage and the proposed Arklow to Shillelagh greenway. • Marine Planning and Coastal Zone Management – Exploit Arklow's marine heritage from a tourism, leisure, renewables and employment perspective.



Table 3-2: Evaluation of the Environmental Effects of Reasonable Alternatives

Environmental Component	Relevant SEO Code/s defined under WCDP	Alternative 1 - (A1)	Alternative 2 - (A2)	Alternative 3 - (A3)	Alternative 4 - (A4)	Alternative 5 - (A5)	Alternative 6 - (A6)
Population & Human Health	PHH	+/-	+/-	+/-	+/-	+	+/-
Biodiversity, Flora & Fauna	BFF	+/-	+/-	+/-	-	-	-
Landscape & Visual Amenity	L	+	-	+	-	0	-
Cultural Heritage - Archaeology & Architectural	CH	+	-	+/-	-	-	-
Soils	S	+	-	+/-	-	-	-
Land Use	S	+/-	+	+	-	+	-
Air Quality and Noise	A	+	+/-	+/-	-	-	-
Water	W	+	-	+/-	-	-	-
Material Assets	MA	+/-	+/-	+	+/-	+	+/-
Tourism & Recreation	PHH / CH	+/-	+	-	-	+	+/-
Climate Change	C	+/-	+	+	-	+	-



4. AA CONCLUSION

An AA Screening and NIR was previously carried out for a draft version of the Variation. The purpose of this report was to identify whether the implementation of the Variation has the potential to have likely, significant effects on the integrity of European sites, alone or in-combination with other plans and projects. In the absence of mitigation, the implementation of the Variation was found to have the potential to result in adverse effects on the integrity of the following European Sites:

- Wicklow Head SPA (004127)
- The Murrough SPA (004186)
- Seas off Wexford SPA (004237)

The risks to the safeguarding and integrity of the qualifying interests, special conservation interests and conservation objectives of the European sites were addressed by the inclusion of mitigation measures that will prioritise the avoidance of adverse effects in the first place and mitigate adverse effects where these cannot be avoided. Furthermore, all lower-level plans and projects arising through the implementation of the Variation and Arklow LPF will themselves be subject to AA when further details of design and location are known.

In-combination effects from interactions with other plans and projects was considered in the assessment and the mitigation measures incorporated into the Variation are seen to be robust to ensure there will be no adverse effects as a result of the implementation of the Variation either alone or in-combination with other plans/projects.

Alterations to the Variation were made following a review of the issues raised during a period of prescribed public consultation period for the Variation. AA Screening-AA was completed for these amendments to the Variation, and it was concluded that these Alterations would not have likely significant/adverse effects on European sites.

Having incorporated mitigation measures, it was concluded in the consolidated, final NIR that the Variation will not give rise to any adverse effects on designated European sites, alone or in combination with other plans or projects. This evaluation was made in view of the conservation objectives of the habitats or species, for which these sites have been designated.



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