



# Arklow Local Area Plan Submission - Report

<b>Who are you:</b>	Agent
<b>Name:</b>	Profile Properties
<b>Email Address:</b>	[REDACTED]
<b>Reference:</b>	ARKLAP-173419
<b>Submission Made</b>	March 28, 2024 6:37 PM

## Topic

Economic Opportunity – Tourism - Shops & Services - Community Facilities

## Submission

See attached submission document

## File

24037 Ballynattin\_Arklow LAP Pre-Draft Sub\_Final 280302024.pdf, 6.02MB

Arklow and Environs LAP,  
Administrative Officer,  
Planning Department,  
Wicklow County Council,  
County Buildings,  
Station Road,  
Wicklow Town,  
A67 FW96

Our Ref. 24037

27 March 2024

**Re: Preparation of the Arklow and Environs LAP – Public Consultation**

Dear Sir/Madam,

We, Stephen Little & Associates, Chartered Town Planning and Development Consultants, 26/27 Upper Pembroke Street, Dublin 2, are instructed to make this formal submission on behalf of our client Profile Properties, Profile Park, [REDACTED]

This submission is made in respect of the pre-draft public consultation stage of the Arklow Local Area Plan, prior to the submission deadline of 2<sup>nd</sup> April 2024.

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

Yours faithfully,



**STEPHEN LITTLE & ASSOCIATES**

27 March 2024

## Table of Contents

<b>1</b>	<b><i>Profile Properties</i></b> .....	<b>3</b>
<b>2</b>	<b><i>Submission Request</i></b> .....	<b>3</b>
<b>3</b>	<b><i>Submission Lands</i></b> .....	<b>3</b>
<b>4</b>	<b><i>Strategic and County Level Planning Policies in Support of Employment</i></b> .....	<b>5</b>
4.1	RSES Eastern & Midlands 2019 – 2031.....	5
4.2	Wicklow Development Plan 2022-2028 .....	6
<b>5</b>	<b><i>Response to Pre-Draft LAP Issues Paper Themes</i></b> .....	<b>6</b>
5.1	Economic Opportunity, Tourism, Shops & Services, Community Facilities.....	6
5.2	Housing, Population, Compact Growth.....	7
5.3	Infrastructure, Sustainable Movement, Transportation .....	8
5.4	Power infrastructure: .....	8
5.5	Flood Relief Scheme: .....	8
<b>6</b>	<b><i>Conclusion</i></b> .....	<b>8</b>
<b>7</b>	<b><i>APPENDIX A: Submission Lands</i></b> .....	<b>9</b>
<b>8</b>	<b><i>APPENDIX B: Recent Planning Permissions on E1 Zoned Lands</i></b> .....	<b>10</b>
<b>8.1</b>	<b><i>Avoca River Park (Former IFI Plant)</i></b> .....	<b>11</b>
8.1.1	No. 1: Timber Frame Factory.....	11
8.1.2	No. 2: Echelon Data Centre .....	11
8.1.3	No. 3: Echelon Data Centre .....	11
<b>8.2</b>	<b><i>Servier Ireland</i></b> .....	<b>11</b>
8.2.1	No. 4 .....	11
<b>8.3</b>	<b><i>Kish Business Park</i></b> .....	<b>11</b>
8.3.1	No. 5 .....	11
8.3.2	No. 6 .....	12
8.3.3	No. 7 .....	12
8.3.4	No. 8 .....	12
<b>8.4</b>	<b><i>North of Kish Business Park</i></b> .....	<b>12</b>
8.4.1	No.9: Echelon Data Centre .....	12
8.4.2	No. 10: Echelon Data Centre .....	12
<b>8.5</b>	<b><i>IDA Park Arklow</i></b> .....	<b>13</b>
8.5.1	No. 11.....	13
8.5.2	No. 12.....	13

## 1 PROFILE PROPERTIES

Profile Properties have a strong reputation built up over the past 25 years for developing a number of well-established, high quality business parks and employment centres in Dublin, including at: -

- Beacon Court, Sandyford - Office/Hospital development
- Kilcarbery Business Park, Grange Castle, Clondalkin – Light Industry/Warehousing (c.600k sq ft)
- Westland Park, Nangor Road, Dublin – Office Park (c.350k sq ft)
- Profile Park, Grange Castle – Business Park (c. 90 acres)

Profile Properties are currently working on a number of proposed new Business Park projects, at

- Castlebagot Business Park, Grange Castle (c. 65 acres)
- Milltown Business Park, Grange Castle (c. 15 acres)

Profile Properties are interested in making further valuable contribution to the creation of viable employment opportunities in Arklow, through the development of their lands at Ballynattin.

These lands are currently zoned for tourism use and subject of previous planning permission for hotel and conference centre, which was not implemented but which demonstrates that the lands are capable of being appropriately serviced for commercial use. Our client is seeking a change to employment zoning, which will facilitate the delivery of a tangible business park proposal, subject to obtaining planning permission. The change of land use zoning at this site has a number of potential benefits for the sustainable development of the town, which are described further below in this submission.

## 2 SUBMISSION REQUEST

This submission seeks a change of commercial zoning from ‘T-Tourism’ to ‘E1-Employment’ at the submission lands at Ballynattin, within the Arklow LAP development boundary.

Further supporting justification for the proposed change of zoning is set out in sections below.

See also enclosed copy of:

- Arklow LAP 2018-2024 zoning map with submission site identified.
- Arklow LAP 2018-2024 zoning map with committed E1 Employment lands identified.

## 3 SUBMISSION LANDS

The submission lands, amounting to c.40 acres, are located at Ballynattin, within the south west of Arklow town.

The lands are located within the Development Boundary of Arklow and are currently zoned for development (“T-Tourism”) under the Arklow LAP 2018-2024.

The submission lands were subject to planning permission (and subsequently an extension of duration) for an integrated tourism product – hotel, conference centre, and parking. There was adequate access and environmental services to cater for that development. The permission withered in 2015.

The land sits within a cluster of E1-Employment lands located in the immediate vicinity of the M11 and R772 junction. The submission site is located immediately opposite the flagship IDA Park. Other business park developments in the immediate vicinity include the Kish Business Park to the south east and the Croghan Industrial Estate to the north east. There is a similar cluster of employment lands to the north of the Town.

We refer the planning authority to the attached Maps and Appendix, which identify the key planning permissions allocated to the existing E1 zoned lands in Arklow. This demonstrates that the vast majority of the E1 zoned land is now committed for development. Many permissions in the north of the town (e.g.

at Avoca River Park) are for data centre type uses which support the significant wind turbine infrastructure in Arklow. We would further highlight that the neighbouring IDA Park is limited to the accommodation of exporting companies only. Consequently, this leaves limited remaining employment zoned lands available for further development of local businesses.

The submission site is well connected via the M11 and R772 junction (at M11 Junction 21). The Arklow South Cycle and Pedestrian Improvement scheme will see the upgrade of approximately 1.6km of inbound and outbound pedestrian and cycle connectivity along the R772 Wexford Road, between the M11 Junction 21 and the existing facilities at the Knockmore Roundabout on the edge of Arklow town centre. This will improve sustainable alternative transport options to the Kish Business Park, IDA Business Park and the submission lands at Ballynattin. The works commenced in January 2023 and are targeted for completion in Q2 2024.

The stability of power supply to the employment and submission lands will be enhanced with the recent grant of planning permission, for a 110 kV ESB substation connecting to existing 220 kV overhead lines, to the north of the submission site.



**Figure 1.** Submission Site Location (source: Google Earth with SLA red overlay).



**Figure 2.** Submission Site location in context of other employment lands (purple) within Arklow LAP development boundary. Also indicating alternative nearby tourism lands (blue) on southern edge of town, outlined in pink.  
(Source: Extract from ArcGIS Portal, with SLA overlay)

## 4 STRATEGIC AND COUNTY LEVEL PLANNING POLICIES IN SUPPORT OF EMPLOYMENT

We outline below the strategic Regional and County level planning policies and objectives that would support the additional allocation of E1-zoned lands in Arklow.

### 4.1 RSES Eastern & Midlands 2019 – 2031

In line with the National Planning Framework (NPF), the Regional Strategic and Economic Strategy (RSES) for the Eastern and Midlands Region, projects that the region is required to accommodate approximately 320,000 additional people in employment by 2040.

The RSES recognises Arklow as an economically active market town in Wicklow County. It also has a significant commuter function. This would indicate that additional zoned employment lands would be of strategic benefit the town and the surrounding area, by facilitating local employment opportunities and reducing the need to commute to other centres.

Profile Properties is seeking a change in zoning from commercial tourism to employment zoning in order to support its business plan to develop a high quality business park at the submission lands. The site has previously proven to be theoretically capable of supporting commercial use (see planning history). Further infrastructure enhancements within the town and benefitting this area (pedestrian & cycle permeability, power connections and town centre improvements and flood relief scheme) support the proposed change of zoning and free up other sites closer to the town centre for residential and tourism uses.

## 4.2 Wicklow Development Plan 2022-2028

The County Plan states that:

*The RSES recognises that the ‘Core Region’ contains a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area, including towns such as Arklow. It is recognised that these towns **have capacity for continued commensurate growth to become more self-sustaining and to attract high quality knowledge based employment at strategic accessible locations**’.*

Other supporting objectives of the County Plan include:

- CPO 9.1** *‘To support all forms of employment creation, 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 this plan. Strategic employment development will be directed into the towns of Bray, Wicklow-Rathnew, Arklow, Greystones and Blessington’.*
- CPO 9.2** *‘To support and encourage proposals that maximise economic opportunities and strengthen the economic structure of the south and west of the County by facilitating economic diversification and new enterprise development including remote working opportunities’.*
- CPO 9.3** *‘will normally require new employment generating developments to locate on suitably zoned or identified land in settlements’.*
- CPO 9.8** *‘To promote and facilitate the development of employment generating uses that maximise Wicklow’s locational strengths along the east coast ‘strategic transport corridor’ and the potential of the ‘Leinster Outer Orbital Route’.*
- CPO 9.19** *‘encourages knowledge, high-tech and services-based specialist industries, and promote the clustering of these types of these and related industries’.*

The proposed change of zoning from tourism to employment use has the capacity to support increased employment opportunities in Arklow as a designated Level 3 self-sustaining growth town. The previous planning permission for tourism (hotel & conference facilities) at this site was not implemented. Real opportunities for employment use should be promoted in the context of supporting self-sustaining population and housing growth in the town.

Arklow is located in south Wicklow, the proposed change to employment zoning would allow for even spread of employment opportunities through the county, with increased distance from Dublin.

Where a change to employment zoning for the submission lands at Ballynattin is realised in the impending Arklow LAP, it is our Client’s intention to immediately apply for planning permission for the necessary buildings and infrastructure to support employment use. Several business end users, with floor space requirements totalling c.70,000 sq ft, have already expressed an interest in locating at this site.

This development would support a range of businesses and employers of various sizes and scales, adding to the accessible cluster of employment lands south of the town, and further enhancing the variety of potential employment opportunities to stimulate economic activity and growth to support the town.

## 5 RESPONSE TO PRE-DRAFT LAP ISSUES PAPER THEMES

### 5.1 Economic Opportunity, Tourism, Shops & Services, Community Facilities

*‘Economic development and the creation of employment opportunities are fundamental to the creation of sustainable communities. The role of the local area plan is focused on land use objectives and zoning land, however these are essential elements that can support economic and tourism development. Wicklow’s [‘Local Economic & Community Plan’](#) and [‘County Tourism Strategy’](#) address a wide range of issues around delivering employment and tourism actions, such as encouraging new employers to locate in the county, marketing, training, financial support, etc.’*

- *What can be done to increase the amount of jobs within the settlement?*

This submission is seeking a **change of zoning from “T-Tourism” to “E1-Employment”** for lands at Ballynattin, to be included as part of the new Local Area Plan for Arklow.



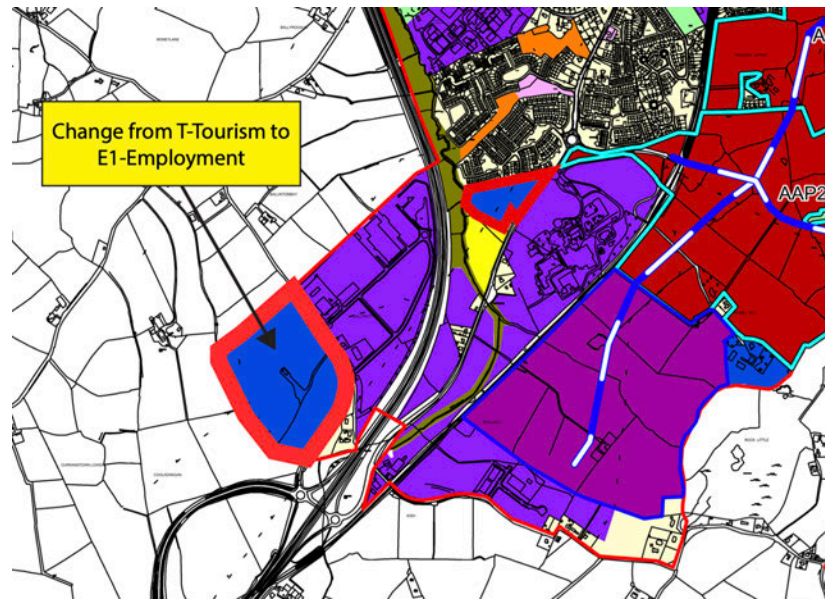


Figure 3. Extract from Arklow LAP 2018-2024 zoning map with submission site identified (SLA red line overlay).

The submission is made on the basis that there is a strong demand for more employment lands in Arklow and to support its function as a self sustaining key town. We refer to the accompanying copies of the Arklow LAP 2018-2024 zoning map for identification of the submission site and the committed E1 employment lands.

We refer the planning authority to the attached Maps and Appendix, which identify the key planning permissions allocated to the existing E1 zoned lands in Arklow. This demonstrates that the vast majority of the E1 zoned land is now committed for development. We would also highlight that the neighbouring IDA Park is limited to the accommodation of exporting companies only. Consequently, this leaves limited remaining employment zoned lands available for further development of local businesses.

The submission lands are well situated to accommodate further local employment activity within the Arklow development boundary, subject to a change to E1-Employment land use zoning that would support Profile Properties business plan. Profile Properties are eager to develop these lands for employment use. As outlined above in their profile description and development portfolio, they have the required expertise in development and managing such development on site, to provide high value local employment.

We note that the existing LAP for Arklow states the following:

*'In order to support possible spin off and economies of scale from existing business and to maximise use of infrastructure already in place, a **primary focus for new employment development will be in this same area around the south of the town, accessible to the M11 interchange**.'*

The rezoning of land would be consistent with this objective, being located just off the M11 and part of a cluster of other (largely committed) employment lands south of the town centre.

A more suitable tourism site for hotel and conference use is zoned closer to the town centre. It is also the case that the zoning of the submission lands for employment would free up sites closer to the town centre more appropriate for residential and tourism uses.

## 5.2 Housing, Population, Compact Growth

It is submitted that the relocation of enterprise employment uses to purpose-built units at the submission site to the southern edge of the town is positive.

It would facilitate the creation of employment facilities at an accessible location to the M11 / R772 junction and Arklow South Pedestrian and Cycle Improvement works, necessary to support population



and housing growth in a self-sustaining town and reduce long distance commuting to other employment centres.

It would also unlock brownfield town centre sites for residential and tourism uses, more suited to this location and the achievement of sustainable compact growth.

### 5.3 Infrastructure, Sustainable Movement, Transportation

- *What are the key transport and movement issues affecting residents, workers and visitors?*

The submission site is well connected via the M11 and R772 junction (at M11 Junction 21). This makes the site accessible and suitable for the movement of goods.

The Arklow South Cycle and Pedestrian Improvement scheme will see the upgrade of approximately 1.6km of inbound and outbound pedestrian and cycle connectivity along the R772 Wexford Road, between the M11 Junction 21 and the existing facilities at the Knockmore Roundabout on the edge of Arklow town centre. This will improve sustainable alternative transport options for the local resident and working community, to the Kish Business Park, IDA Business Park and the submission lands at Ballynattin. The works commenced in January 2023 and are targeted for completion in Q2 2024.

The provision of further employment opportunities at this location would reduce the need for long distance commuting to other employment centres. This is positive in respect of supporting local employment to locate within the town and to reduce the impact of carbon emissions associated with car based commuting.

Profile properties would welcome any plans for increased connectivity across the M11 corridor that would further improve the connectivity of the existing IDA Business Park and the submission lands to the town centre and the R772.

### 5.4 Power infrastructure:

Planning permission has been granted (ABP Reg. Ref. ABP-315200-22) north of the site for a 110 kV substation, connecting to existing 220 kV overhead lines to the northwest.

This development will aid in increasing the stability of power to these lands and Arklow generally, priming the submission site for employment development alongside the IDA Business Park/Arklow Business Park.

### 5.5 Flood Relief Scheme:

Planning permission was granted (ABP Reg. Ref. ABP-31068-21) for the Arklow Flood Relief Scheme works within the town centre. This future proofs further development within the town from significant flood risk.

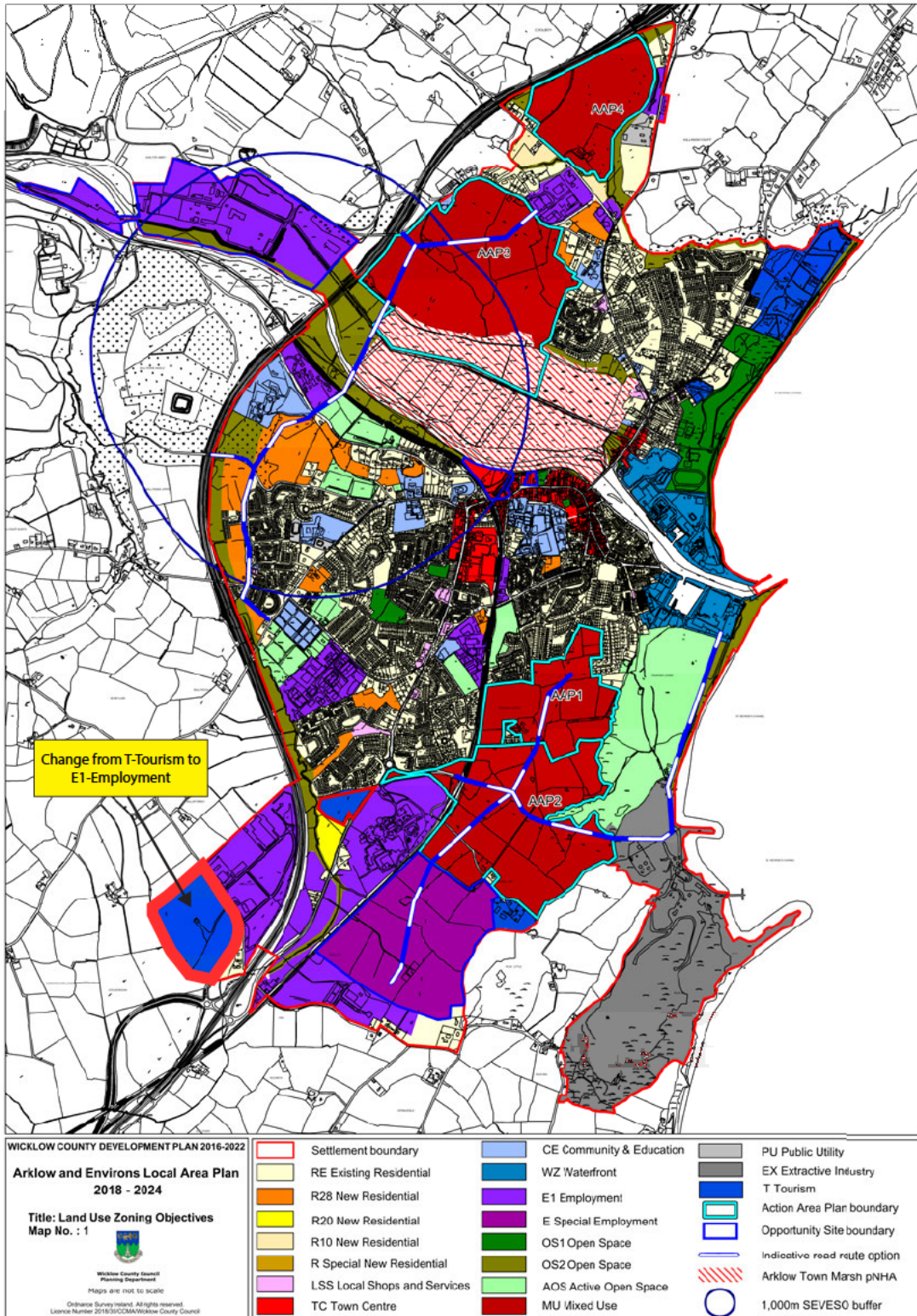
## 6 CONCLUSION

For all of the reasons set out above, this submission seeks a change of commercial zoning from 'T-Tourism' to 'E1-Employment' at the submission lands at Ballynattin, within the Arklow LAP development boundary.

See also Appendix A for planning history and enclosed copy of:

- Arklow LAP 2018-2024 zoning map with submission site identified.
- Arklow LAP 2018-2024 zoning map with committed E1 Employment lands identified.

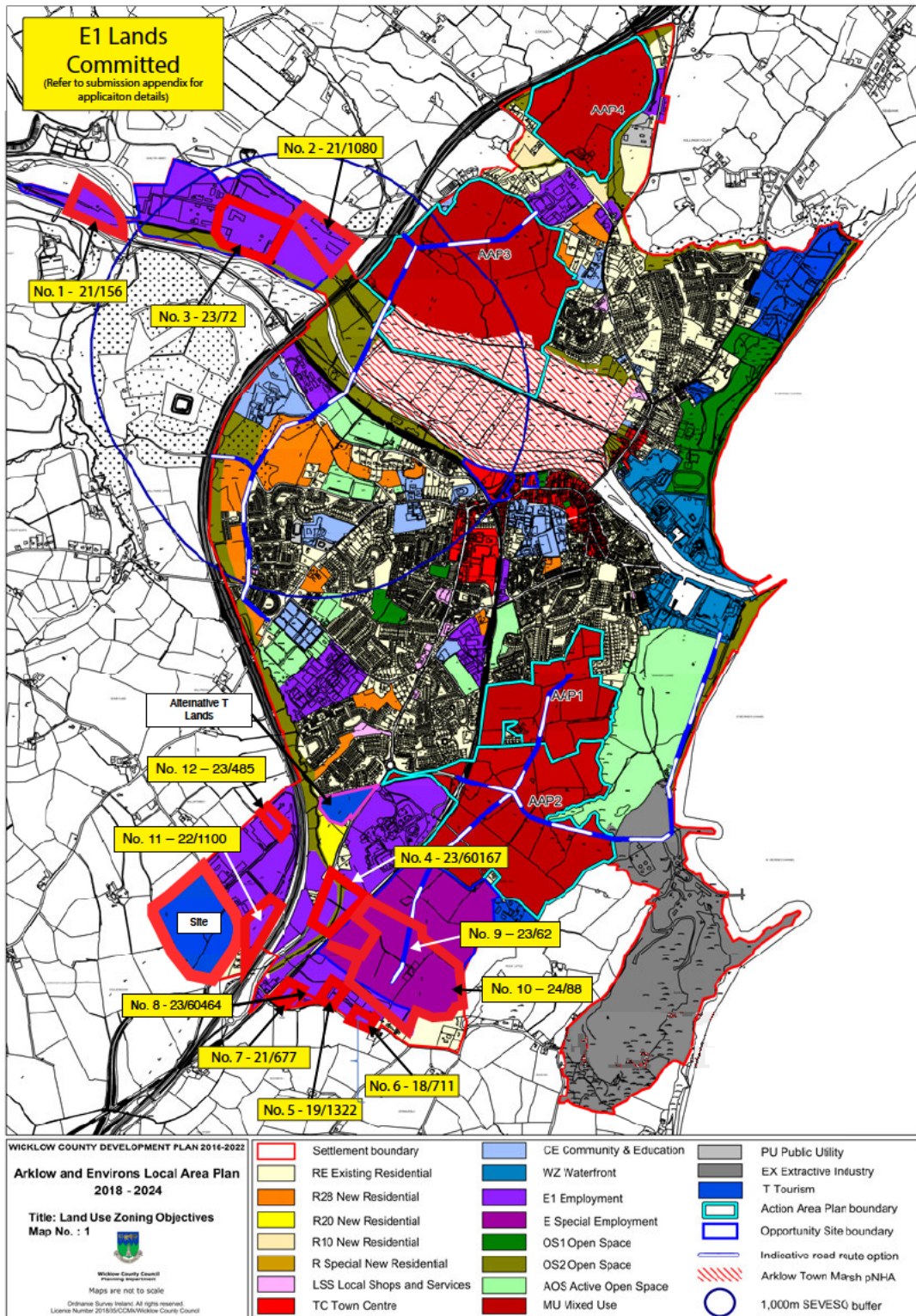
7 APPENDIX A: SUBMISSION LANDS





### 8 APPENDIX B: RECENT PLANNING PERMISSIONS ON E1 ZONED LANDS

Please refer to the accompanying map for the location of these permissions. Below we outline the planning permissions on E1 Employment zoned lands. It is submitted that a large proportion of these lands are committed for Arklow town. This demonstrates a need for increased E1 lands to help stimulate employment uses and cater to the town’s economic and employment growth.



## **8.1 Avoca River Park (Former IFI Plant)**

### **8.1.1 No. 1: Timber Frame Factory**

**Ref.** 21/156

**Proposal:** Extension to Harmony Timer

**Proposer:** Harmony Timber Solutions

**Date of Grant:** 18 May 2021

### **8.1.2 No. 2: Echelon Data Centre**

**Ref.** 21/1080

**Proposal:** The proposed development consists of the Construction of 2 no. energy centre buildings (Energy Centre 1 and Energy Centre 2)

**Proposer:** Crag Digital Avoca Ltd

**Date of Grant:** 15 June 2023

### **8.1.3 No. 3: Echelon Data Centre**

**Ref.** 23/72

**Proposal:** The proposed development, for which a ten-year permission is sought, consists of the following: Demolition of the existing structures on site (industrial structures and outbuildings) and site clearance works; construction of 3 no. three storey information and communication technology (ICT) facility buildings, each with a gross floor area (GFA) of c. 16,206 sq.m (c. 48,618sq.m GFA in total)

**Proposer:** Crag Digital Avoca Ltd

**Date of Grant:** 25 July 2023

## **8.2 Servier Ireland**

### **8.2.1 No. 4**

**Ref.** 23/60167

**Proposal:** Large scale PV Panel Array (3,136 panels)(14,500m<sup>2</sup>)

**Proposer:** Servier Ireland

**Date of Grant:** 29 November 2023

## **8.3 Kish Business Park**

### **8.3.1 No. 5**

**Ref.** 19/1322

**Proposal:** single industrial unit of 710m<sup>2</sup>

**Proposer:** Robert Marshall

**Date of Grant:** 18 March 2020

**8.3.2 No. 6**

**Ref.** 18/711

**Proposal:** 6 light industrial units of 1,513m<sup>2</sup> overall

**Proposer:** Kish Business Park Ltd

**Date of Grant:** 9 April 2019

**8.3.3 No. 7**

**Ref.** 21/677

**Proposal:** construction of Biofuel facility comprising of a part 3 storey and part single storey commercial building with a total floor area of 1771m<sup>2</sup>.

**Proposer:** Kish Renewables Ltd

**Date of Grant:** 27 October 2023.

**8.3.4 No. 8**

**Ref.** 23/60464

**Proposal:** Single storey large industrial unit with ancillary office accommodation with a total floor area of 2310m<sup>2</sup>.

**Proposer:** Emer Smith

**Decision Due:** March 2024.

**8.4 North of Kish Business Park****8.4.1 No.9: Echelon Data Centre**

**Ref.** 23/62

**Proposal:** Provision of a three-storey Battery Energy Storage System (BESS) building with a gross floor area (GFA) of c.13,787m<sup>2</sup> located to the southeast of the permitted ICT Building 3.

**Proposer:** Crag Wicklow Ltd

**Date of Grant:** 18 April 2023

**8.4.2 No. 10: Echelon Data Centre**

**Ref.** 24/88

**Proposal:** In summary, the development comprises the replacement of the 3 no. part one and part two storey ICT facility buildings permitted on site, with 5 no. part two and part three storey ICT facility buildings with a reduced building footprint, along with an energy centre compound. The Battery Energy Storage System permitted under Reg. Ref. 23/62 and the substation and transmission line connections permitted under ABP Ref. 315200-22 will be unaffected by the proposed alterations.

**Proposer:** Crag Wicklow Ltd

**Date of Decision Due:** 22 April 2024

## 8.5 IDA Park Arklow

### 8.5.1 No. 11

**Ref.** 22/1100

**Proposal:** Retention permission is sought for (1) an additional 275m<sup>2</sup> of floor area to the already approved 2,300m<sup>2</sup> manufacturing & engineering industrial unit now totalling 2,575m<sup>2</sup> with minor alterations and revisions to the elevations

**Proposer:** LHM Engineering Ltd

**Date of Decision:** 19 January 2023

### 8.5.2 No. 12

**Ref.** 23/485

**Proposal:** to erect a 532m<sup>2</sup> commercial building comprising a 432m<sup>2</sup> manufacturing/industrial unit with an ancillary 100m<sup>2</sup> office space

**Proposer:** Marine Health Foods Ltd

**Date of Decision:** 6 February 2024