

	Arklow LPF Variation No.5
---	------------------------------------

Who are you:	Agent
Name:	Paschal Bermingham
Reference:	ARKLPF-150807
Submission Made	November 10, 2025 3:13 PM

Maps:

- Land Use Map
- Key Green Infrastructure Map

Map



Site Description:

Upload a File (optional)

25.11.10 Ferrybank Site Arklow LPF Submission.pdf, 2.89MB

Conor McCarthy & Associates Ltd

Consulting Engineers and Project Managers

Submission

Draft Arklow Local Planning Framework 2025

Proposed Variation No. 5

Wicklow County Development Plan 2022 - 2028

Site, Ferrybank, Arklow.



Our ref. 25.519

November 2025

Introduction & Brief

This report has been prepared in response to a call for submissions on the Draft Arklow Local Planning Framework 2025.

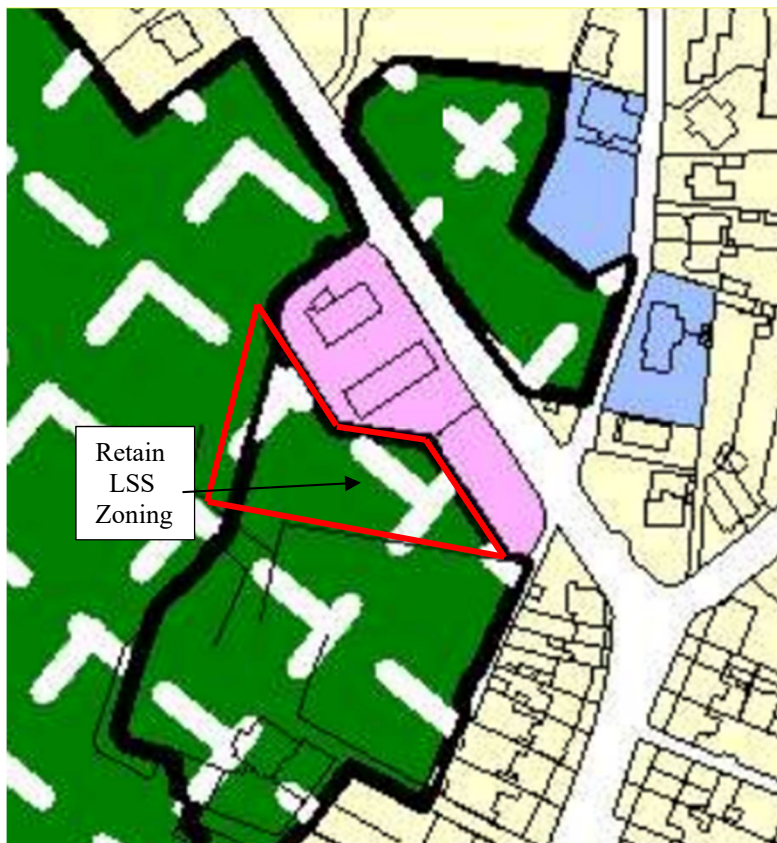
The purpose of this submission is to 'fine tune' the proposed zoning and retain the commercial viability of the remainder of the 'Circle K' site for Local Shops and Services

The report has been prepared by Conor McCarthy, Chartered Engineer, of Conor McCarthy & Associates Ltd, Consulting Engineers.

Conor has over 30 years local experience of development from the technical aspects of Planning through to the construction of infill developments within the town of Arklow.

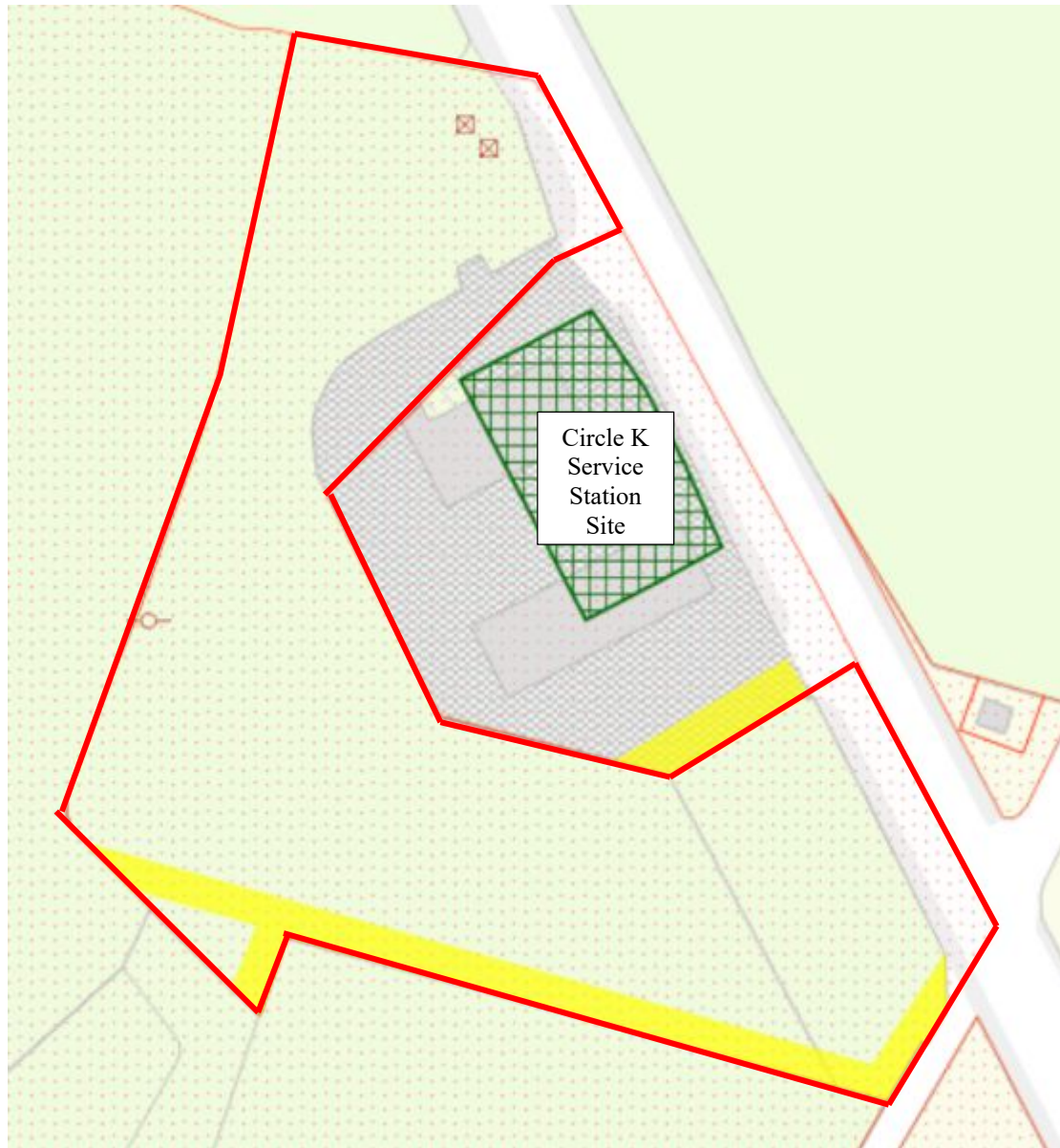
Summary of Proposal

To maintain viability of site, line between OS and LSS altered slightly



The Site

The site encircles the Circle K Service Station Development.

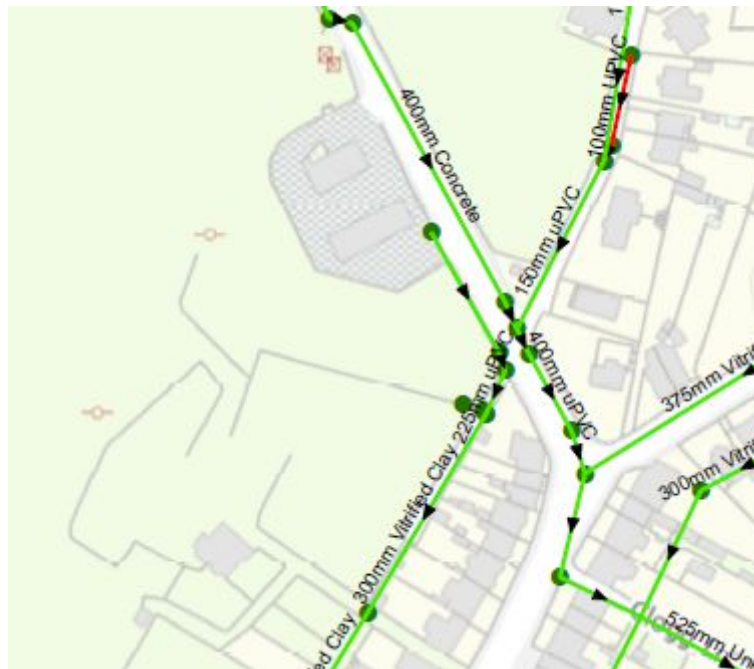


The site is contained in Folio WW22587F and has an area of c.0.52Hectares/ 1.3Acres.

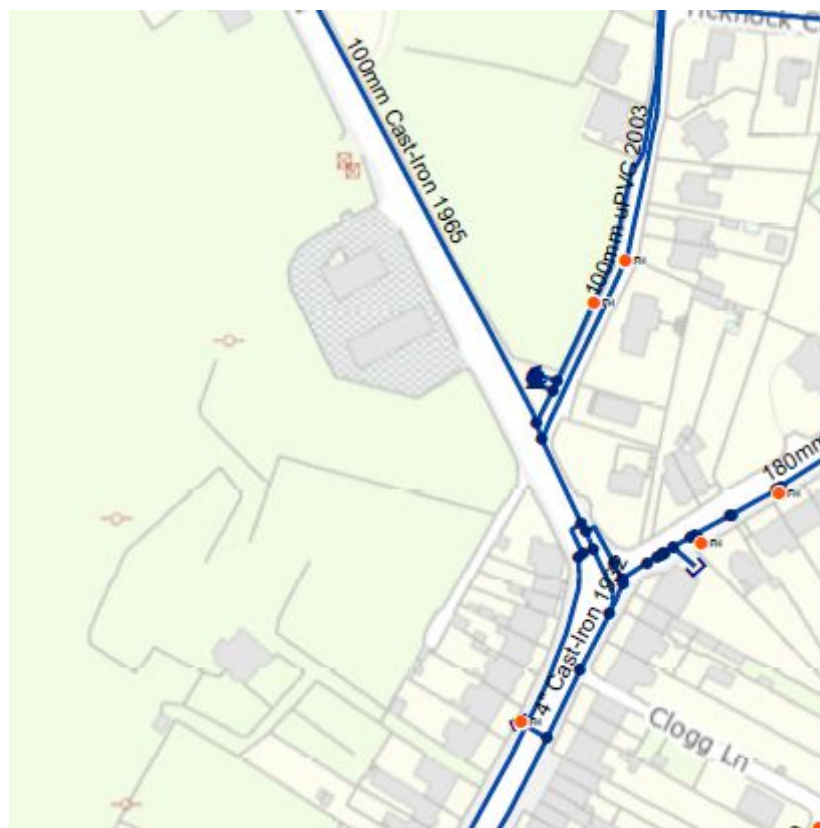
The site is served by the old Dublin Road(N11) to the front with secondary access along its southern boundary.

To facilitate full access, without creating another exit onto the public road, there is a right of way through Circle K.

The site is fully serviced with mains power, water and sewage available to the site in the Public road.



Extract Irish Water Sewer Network Map



Extract Irish Water Services Network Map

Current Zoning (Site outlined in Green)



LSS Local Shops and Services

Under the Arklow and Environs Local Area Plan 2018 – 2024

LSS: LOCAL SHOPS & SERVICES	To provide for small scale local neighbourhood shops and services	To facilitate the limited development of small scale local neighbourhood shops and retail services and other local service uses that meet only the retail or service needs of residents in the immediate catchment and are not of such a scale or type that would detract or draw trade from lands designated town centre.
-----------------------------------	---	--

Existing & Adjoining land Uses

Circle K Fuel service station including retail shop, off licence and Hot food Deli counter.





Residential Housing to the South

The site is

- Zoned
- Serviced with Power, water and sewage
- Established Access

and is, therefore a viable development site.

Proposed Zoning Draft Arklow Local Planning Framework 2025



The site is largely rezoned as Open Space with only a small provision retained for Local Shops and Services to the South of the Petrol Station.

The Green Infrastructure Audit(GIA) gives the background in that this site is examined as part of the larger Town Marsh Area

4.0 Land Use Zoning assessment & recommendations with respect to Green Infrastructure assets

Location	Arklow Town Marsh & Environs
Description	Proposed Natural Heritage Area on northern banks of Avoca River and adjacent lands, including a 100m buffer from the northern boundary of the marsh, backlands of properties at Ferrybank, and watercourse buffers.
Map of GI asset	Land Use Zoning Arklow LAP 2018 
Key considerations impacting future zoning	OS2 'Passive Open Space', Unzoned pNHA, MU 'Mixed Use', small areas of LSS 'Local Shops & Services', CE 'Community & Education' and RE 'Existing Residential' along the eastern boundary. Designated site (pNHA), previous zoning, Flood Risk, Arklow Marsh Protection Report May 2025

The GIA refers to the 2025 Marsh report and in particular the map contained therein:



We note that the Marsh report excludes the southern portion of the site from the Marsh PNHA area and buffer zone.

The GIA concludes as follows:

- In relation to backlands to the rear of properties west of the R772 at Ferrybank, zoned RE 'Existing Residential' and LSS 'Local Shops and Services', flood risk is apparent throughout the area. It is considered appropriate that the precedent established in the last plan of OS2 zoning to backlands just south of this area be extended, providing an extended buffer to the east of the Marsh.

It is noted that Flood Risk Assessment is already dealt with through the Development Management Process which is more suited to individual sites.

We have carried out an assessment of the Site for development including a full Flood Risk Assessment (refer to appendix A) which satisfies the Justification Test

Site Assessment for Development

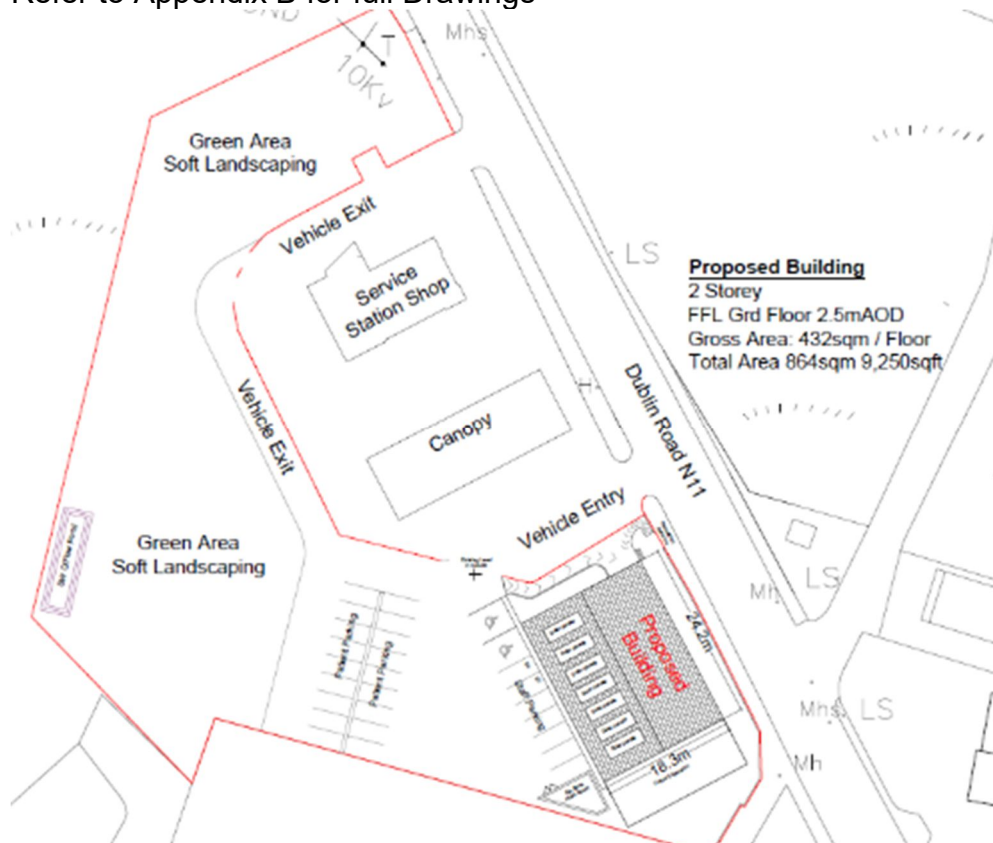
Based on Local Shops and Services Zoning the most appropriate is the 'Less Vulnerable Development' category

'Buildings used for: retail, leisure, warehousing, commercial'

Within this category the most likely viable commercial development is that a purpose-built Medical Practice Building. (GP Practice & Ancillary Services)

Proposed Development Scheme

Refer to Appendix B for full Drawings



There is a demand to accommodate new services as well as facilitating the expansion of existing practices currently located in cramped unsuitable sites. The development would provide essential healthcare services to a growing local population, while contributing positively to the urban fabric through the efficient use of underutilised land.

Compliance with Local Development Plans

The proposed use is consistent with the Wicklow County Development Plan and Arklow Local Area Plan for Arklow, which encourage the provision of accessible community and healthcare services and promote the compact growth of town centres and urban areas.

The development contributes to strategic planning objectives by:

Supporting sustainable land use through redevelopment of an infill site;

Encouraging modal shift with a central, walkable location near public transport;

Meeting identified social infrastructure needs as Arklow expands.

Land Use Zoning

The proposal is compatible with zoning objectives.

Need and Demand

Arklow and the surrounding hinterland have seen population growth, (Lioncor Planning for c.100 houses at Kilbride as part of 1500 house development) resulting in:

- Increasing demand for local GP and primary care services;
- Pressure on existing medical facilities and long wait times;
- A need for accessible, modern healthcare infrastructure close to residential areas.

This proposal directly responds to those needs.

Site Suitability and Infill Development

The subject site is a vacant/underutilised parcel of land that presents an opportunity for infill development.

The project:

- Promotes efficient land use and urban regeneration;
- Minimises urban sprawl by utilising existing service infrastructure;
- Enhances the streetscape with a well-designed, contextually appropriate building;
- Minimises impact on surrounding amenities through appropriate scale, massing, and landscaping.

Access, Parking and Sustainability

The site benefits from proximity to public transport, pedestrian routes, and cycling infrastructure.

Parking will be available with consideration for:

- Accessible parking spaces;
- Secure bicycle parking;
- EV charging points

The building will meet or exceed current NZEB (Nearly Zero Energy Building) requirements, using sustainable materials and energy-efficient systems.

Social and Economic Benefits

The development will:

- Enhance community well-being by providing vital health services locally;
- Generate local employment during construction and operation;
- Stimulate footfall and economic activity in the surrounding area.

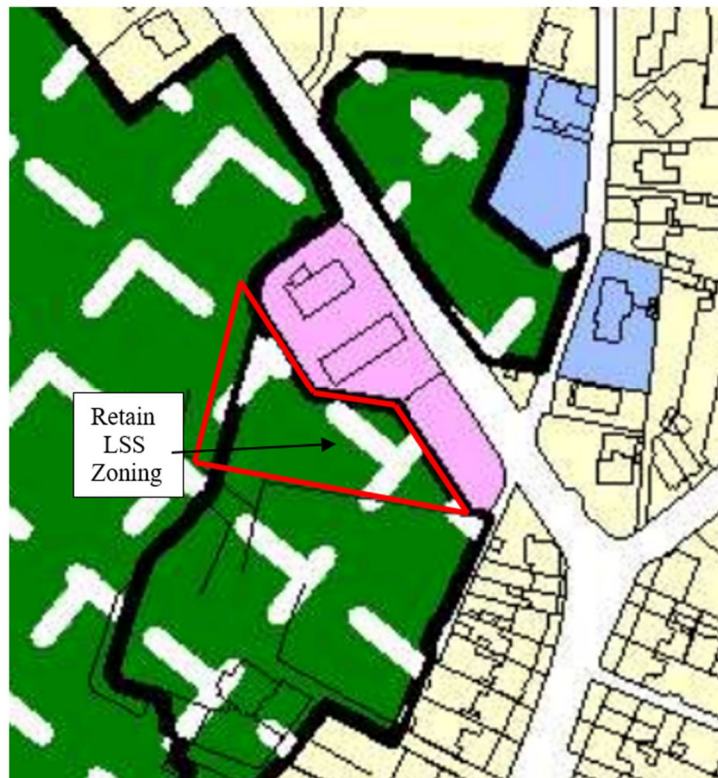
From a planning perspective a Medical Centre represents a well-considered, sustainable use of a small infill site that aligns with national and local planning policies. The development would support compact growth, address healthcare access needs and integrate appropriately into the urban environment.

Justification Test

Having regard to the location, zoning, flood risk assessment, and the public interest served by the development, the proposed Surgery passes the Justification Test set out in the Flood Risk Management Guidelines.

Required minimum viable area for site to develop

In order to be viable the area outlined in red should retain its LSS Zoning



Expansion of existing Local Shops & Services

This site has an existing commercial use with the adjacent Circle K operation expressing an interest in developing their site to the rear and Southwards.

Conclusion

Most coastal towns and city suburbs are located within a Flood Zone Area.

Unless the existing Town Centres and Urban Suburbs are to be abandoned in favour of ever-expanding greenfield development, which is not National Policy, infill sites within the established settlement must be utilised for appropriate development.

This site is currently zoned for Local Shops & Services and is capable of being developed as a commercial site without undue or specialist works. Alternatively, the existing adjacent business can expand to incorporate part of this site.

The proposal to effectively dezone 90% of the site is unwarranted and not required to meet the stated objectives.

A minor modification of the current proposal would retain a minimum viable area for Local Shops & Services and allow the site to develop as part of the infrastructure of the town.

Conor McCarthy
Chartered Engineer

Appendix A

Flood Risk Assessment

Flooding and Planning / Development

The site is located within a designated Flood Zone which has an impact of what type of development is most appropriate for the site.

Flooding History

The Author is familiar with the site and lives locally. The site and surrounding area was flooded by Hurricane Charley in 1986, almost 40 years ago. There has been no significant flooding of the site nor of the Service station adjacent since that time. It is also noted that the Service Station has undergone a complete redevelopment and expansion in the last few years.

Flood Assessment Process

From the '**Arklow And Environs Local Area Plan 2018 Appendix C Strategic Flood Risk Assessment**' the site is located within



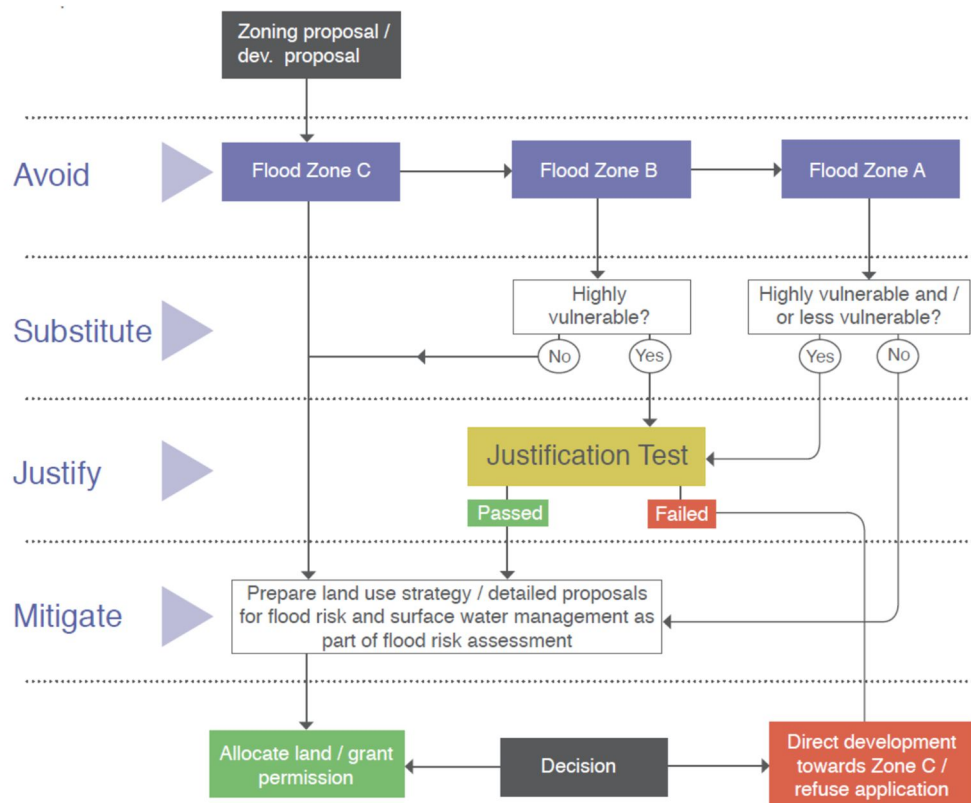
FLOOD ZONE A: High probability of flooding

Where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding)



Sequential approach

The sequential approach as described in Fig. 1.1 of the Flood Risk Guidelines



Similar site staht have been granted permsiion / developed
 The types of development are spilt into Highly Vulnerable / Less Vulnerable

CLASSIFICATION OF VULNERABILITY OF DIFFERENT TYPES OF DEVELOPMENT	
Vulnerability class	Land uses and types of development which include*:
Highly vulnerable development (including essential infrastructure)	Garda, ambulance and fire stations and command centres required to be operational during flooding; Hospitals; Emergency access and egress points; Schools; Dwelling houses, student halls of residence and hostels; Residential institutions such as residential care homes, children's homes and social services homes; Caravans and mobile home parks; Dwelling houses designed, constructed or adapted for the elderly or other people with impaired mobility; and Essential infrastructure, such as primary transport and utilities distribution, including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESO sites, IPPC sites, etc.) in the event of flooding.
Less vulnerable development	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions; Land and buildings used for holiday or short let caravans and camping, subject to specific warning and evacuation plans; Land and buildings used for agriculture and forestry; Waste treatment (except landfill and hazardous waste); Mineral working and processing; and Local transport infrastructure.

Based on Local Shops and Services Zoning the most appropriate is the 'Less Vulnerable Development' category
'Buildings used for: retail, leisure, warehousing, commercial'

Medical Practice Building

Within this category the most likely viable commercial development is that a purpose-built Medical Practice Building. (GP Practice & Ancillary Services)

Justification Test

A Justification Test is a key part of planning applications in flood-prone areas, especially under the Planning System and Flood Risk Management Guidelines for Planning Authorities.

Proposed Development: Medical Practice Building

Location: Flood Zone A, Arklow, Co. Wicklow

Step 1: The development is within a core strategy area and is on zoned & serviced lands.

The site is within the development boundary of Arklow, which is identified as a key town in the Wicklow County Development Plan and the Arklow and Environs Local Area Plan.

The site is zoned for local Community Services.

The lands are serviced, with access to public water supply, foul sewerage, and roads infrastructure.

Step 2: A flood risk assessment (FRA) has been carried out that demonstrates the development will not be subject to unacceptable flood risk and will not cause unacceptable flood risk elsewhere.

A Site-Specific Flood Risk Assessment (SSFRA) will be prepared in accordance with OPW and local authority guidance as follows.

The FRA shows the site lies within Flood Zone A, where the probability of flooding from fluvial sources is high.

The proposed GP surgery is a 'less vulnerable' use as per the Guidelines.

The FRA confirms that:

Finished floor levels will be raised above the 1-in-100 year flood level with an appropriate freeboard.

Flood resilience and mitigation measures

Regardless of historical flood events and flood defence measures, the possibility of flooding remains for all coastal/riverside developments and the adoption of a suitable and appropriate floor level is probably the most important factor in mitigation of flood risk.

We have assessed the surrounding developments which were granted planning, built and unbuilt, to ascertain if there is a consensus on ground floor level for flooding.

Development	Status	Residential Ground Fl.	Floor level AOD	Comment
Circle K Redevelopment	Built	No	2.35	Less Vulnerable Development
Arklow	Unbuilt	Yes	2.6m	Vulnerable Development

Shipping Old Offices site Redevelopment				
Arklow WWTP	Built	No	2.5m	Less Vulnerable Development
Arklow Shipping New Offices	Built	No	3.2m	Less Vulnerable Development
Arklow Marina Dev. North Quay	Built	Yes	2.9m	Steps up to Units fronting Marina
BCF Block 8, Marina North Quay	Unbuilt	No	2.8m	Vulnerable Development

As part of the Circle K (Site Immediately Adjacent) Flood assessment the flood levels were determined as 2.48m for 1 in 100 yrs and 3.02 for 1 in 1000 years

6.1. Estimation of Extreme Flood Levels in the Avoca River

Extreme flood levels have been derived as part of the Eastern CFRAMS/Avoca River Arklow Flood Relief Scheme at node Point 5 located on the Avoca River approximately 498m south-west of the proposed development site. Node Point 5 is summarised in Table 4 below.

Return Period	Node 5 (m OD)
1 in 100 Year (1% AEP)	2.48
1 in 1000 Year (0.1% AEP)	3.02

Table 4: Fluvial Flood Levels

The various reports and assessments over the years have gotten more detailed and nuanced with regard to Climate Change etc. The site has a general level of c.2.1m AOD and a floor level of c.400mm above this at 2.5m AOD would appear to be appropriate.

Floor level 2.5m AOD

Flood resilient construction methods; reinforced concrete ground floor & piled raft foundations, solid masonry construction with external insulation will all be employed, services located will off FFL.

The development will include sustainable drainage systems (SuDS) to manage surface water through the adaption of permeable pavement and soft landscaping externally to mimic the existing site conditions.

Safe access/egress routes during flood events will be identified to the front of the site.

The proposal will not displace floodwaters in a manner that would increase flood risk elsewhere by extensive use of permeable pavement, soft landscaping and attenuation storage.

Step 3: The development is of overriding public interest and provides a vital community service.

The proposed Surgery will provide essential primary healthcare services to the growing local population.

The development supports national and regional health strategies promoting access to healthcare in local communities.

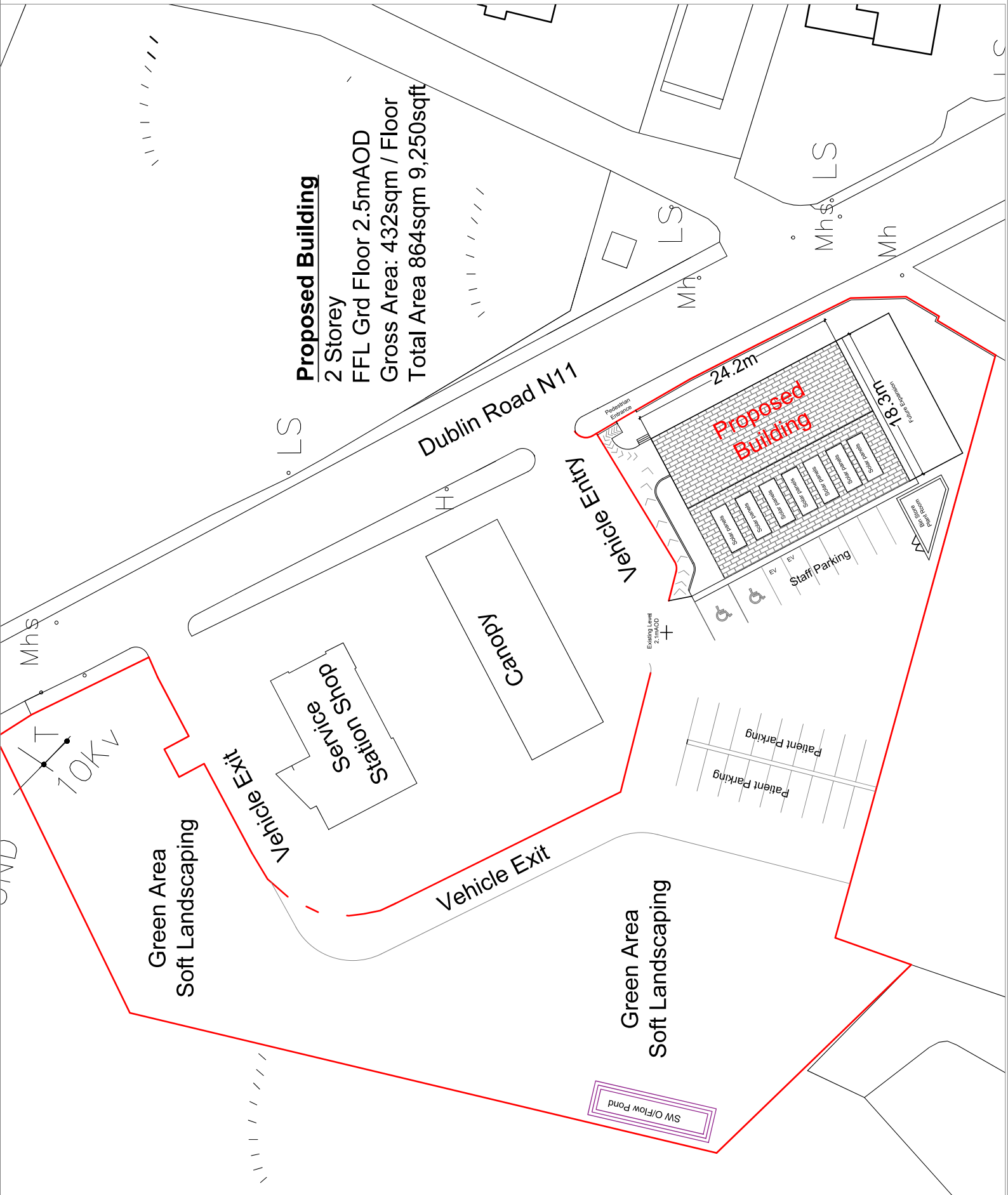
The project meets a demonstrable need and is the only available site within the catchment that is both suitably zoned and serviced.

Relocating to an area outside Flood Zone A would significantly hinder service provision and access, particularly for vulnerable users.

Conclusion to Justification Test

Having regard to the location, zoning, flood risk assessment, and the public interest served by the development, the proposed Surgery passes the Justification Test set out in the Flood Risk Management Guidelines.

1. THIS DRAWING TO BE READ IN CONJUNCTION WITH ANY PREVIOUS ARCHITECTS AND ENGINEERS DRAWINGS.
2. FIGURED DIMENSIONS ONLY TO BE TAKEN FROM THE DRAWING. ENGINEER TO BE INFORMED IMMEDIATELY OF ANY DISCREPANCY.



--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

[illegible]