



Arklow Local Area Plan Submission - Report

Who are you:	Agent
Name:	McGill Planning on behalf of Certain Assets of Dawnhill and Windhill Limited acting for Lioncor Developments
Email Address:	[REDACTED]
Reference:	ARKLAP-153544
Submission Made	April 2, 2024 3:44 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Please see the attached LAP Planning Letter by McGill Planning Limited.

Topic

Regeneration of Communities & Places - Healthy Placemaking - Urban Design - Opportunity Sites in Arklow

Submission

Please see the attached LAP Planning Letter by McGill Planning Limited.

Topic

Infrastructure - Sustainable Movement – Transportation

Submission

Please see the attached LAP Planning Letter by McGill Planning Limited and Transport Appraisal Note by Sytstra

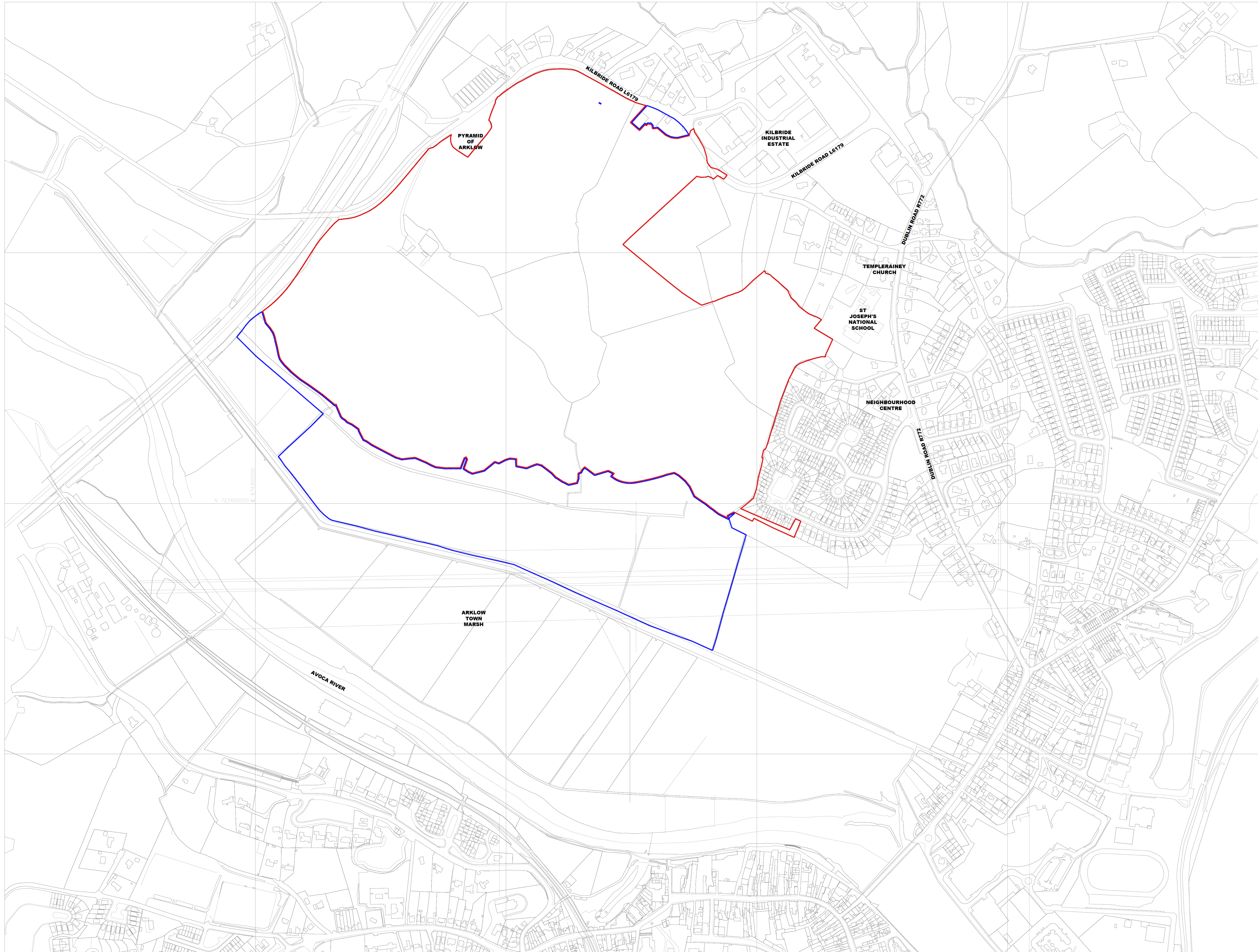
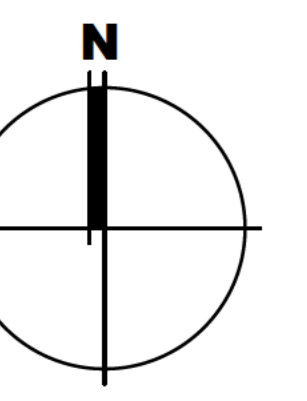
File

6191-P3-001A_Site Location Map for LAP.pdf, 1.76MB

Arklow LAP Planning Letter.pdf, 3.01MB

IE01T24A28 - Arklow Masterplan Lands - Transport Appraisal Note_Final.pdf, 1.7MB

6191-P3-002A_Proposed Site Plan for LAP.pdf, 6MB



LEGEND: [LOCATION MAP]

- Site Boundary
- Land in Client Ownership

ORDNANCE SURVEY IRELAND
 © GOVERNMENT OF IRELAND
 DIGITALLY REPRODUCED UNDER
 LICENCE NUMBER: AR0003519

SITE LOCATION MAP

Notes:
 1. Copyright Reserved
 2. Work to be used for the purposes of the project only. Do not scale drawing.
 3. The contractor is responsible for checking all levels and dimensions on site and shall make all adjustments to the finished.
 4. Where appropriate, for details of c/c, structure, or mechanical and electrical details, see Engineers drawings.
 5. Please refer to the relevant sections of the specification for further details.
 6. Site of any utility lines shall be checked with the authorities.
 7. The contractor shall be responsible for the coordination of structure, finishes, and services.

Issue Status
 Progress
 Planning Application
 F100 Cert
 Disability Cert
 T1000
 Construction
 P1000
 P1000

No.	Date	Revision	By	Check
01	27/03/24	1.0	M. Stammers	

Project: Mixed Use Residential & Commercial Development at Kilbride, Arklow, Co. Wicklow
Drawing Title: SITE LOCATION MAP - OS MAP
Drawing No.: 6191-P3-001A
Scale: 1:2500 @ A0
Rev: 01
Drawn: J.F. ED
Date: 27/03/24

bkd architects
 BURKE-KENNEDY DOYLE



Notes:
 1. Copyright Reserved
 2. Work to be done in accordance with the approved drawings
 3. The contractor is responsible for checking all levels and dimensions on site and shall make all discrepancies to the architect
 4. Where appropriate, for details of c/c, structure, or mechanical and electrical details, see Engineers drawings
 5. Please refer to the relevant drawings for details of c/c, structure, or mechanical and electrical details, see Engineers drawings
 6. Scope of any other items to be checked with manufacturer
 7. The contractor shall be responsible for the coordination of structure, finishes and services

Issue Status
 Progress
 Planning Application
 P/10 - Part
 Disability Cert
 Tender
 Construction
 For Sale
 Information Only

No.	Date	Revision	Author	Check
01	29/03/24	1.0	J.P. Sullivan	J.P.

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

2nd April 2024

Dear Sir/Madam

Re: PREPARATION OF THE ARKLOW AND ENVIRONS LOCAL AREA PLAN CONSULTATIONS UNDER SECTION 20 OF THE PLANNING & DEVELOPMENT ACT 2000 (AS AMENDED)

SUBMISSION TO PRE-DRAFT CONSULTATION STAGE FOR THE ARKLOW & ENVIRONS LOCAL AREA PLAN (LAP)

SUBMISSION ON BEHALF OF “CERTAIN ASSETS OF DAWNHILL AND WINDHILL LIMITED”

1.0 INTRODUCTION

We refer to the Notice of Public Consultation for the Pre-Draft for the new Arklow & Environs Local Area Plan as per Section 20(3) of the Planning and Development Act 2000 (as amended).

We have been instructed by our client – “Certain Assets of Dawnhill and Windhill Limited” acting on behalf of Lioncor Developments to prepare the following submission to this Pre-Draft Stage for the next LAP for Arklow. Our client is the single landowner for the entire Action Area Plan 3 Kilbride lands.

As the planning authority will be aware our client owns and controls a significant landbank located at Kilbride, Arklow. The Kilbride lands within our client’s ownership extend to approximately 77 hectares (190 acres) - please refer to Figure 1 below.



Figure 1 Extent of Kilbride Lands

Our client firstly wishes to record their broad support for the intent of WCC to prepare a new LAP for Arklow, and within which their landholding forms a significant portion.

Our client is keen that the future ambitions for the town to be outlined in the new LAP and generally align with their own ambitions to progress development of their lands over the coming years, and in particular to deliver on the long standing objectives for the lands to deliver significant residential development and supporting social and physical infrastructure.

As will be discussed below, Arklow has been significantly restrained from development in recent years due to the delay in providing a modern wastewater treatment facility for the town to replace the continued release of untreated waste to the Avoca River.

This restraint has meant that Arklow, despite being the 4th largest urban centre in the County, and the largest town in the south of the County, grew in population by only 1.8% between the 2016 and 2022 Census. During the same period other towns in Wicklow including Rathnew (+17.8%), Greystones/Delgany (+21.3%) and Newtownmountkennedy (+24.8%) for

instance grew significantly. Furthermore, we note that Gorey, in County Wexford, 15km to the south along the M11 grew by 17.3% during that time.

This represents one of the lowest urban growth rates recorded in the Country during this time and is less than a quarter of the overall national growth rate of 8% that was recorded.

It is clear that over the next 6 years of the new LAP, and with the new WWTP in place from next year, that Arklow has to significantly catch up with the other settlements in the county.

To this end, it is critical that the new LAP does not unreasonably stymie the growth potential of the town, particularly through the imposition of zoning restrictions and reservation which would seek to delay the delivery of much needed housing and population growth. A further consideration is to ensure that a better pattern of growth between the north and south of the town continues to be followed as was designated in the current LAP.

Our client is actively involved in progressing the development of their lands at Kilbride to help drive this new era of growth in the town and help return a sustainable balance of development in the south of the County, with Arklow at its heart.

As the planning authority will be aware a first phase of residential development on the lands, for 84 units and associated masterplan including the first phase of strategic road and new public parks, is already in planning (Ref. 23/756) and following recent submission of a Further Information Response, is expected to be receive a Notification to Grant in April 2024.

As has been the case with our client's other developments in the County (for example the Kilruddery Glen residential development (160 apartments, 18 duplex homes and 30 houses) at Southern Cross Road, Bray), it is their full intention to commence development of this first phase of residential development and infrastructure as soon as permission is secured.

In addition, our client has submitted a next phase proposal for pre-planning under the new LRD provisions, for c.1,420 units, along with new local centre, childcare, and associated services in accordance with the AAP3 under the current LAP.

Our clients, Lioncor, are developers, not land speculators and have a track record of delivering much needed homes in the current National Housing Crisis, having completing sites in Wicklow, Dublin, Cork, Limerick and Galway. In 2023 Lioncor successfully collaborated with Cooperative Housing Ireland and Wicklow County Council to deliver 208 units at Kilruddery Glen in Bray.

Today Lioncor, are active on 6 No. sites constructing over 1,200 units, 894 of which are located on the Glass Bottle site which has an overall capacity of 3,500 units. In addition, Lioncor are progressing c.6,000 units across 9 further sites through the planning process. Lioncor are fully funded and build what they get permission for, and it is their intent to fully deliver the Kilbride

lands over the coming years along with the associated infrastructure and significant amenity benefits that will accrue to the town.

Given the above, we therefore request that Kilbride AAP lands are retained, and zoning continued in full in the new LAP in order to facilitate its delivery and provide the necessary housing and population growth that Arklow desperately requires following a lost decade of growth.

Site & Planning Context

The subject site is located in the area of Kilbride on the northern side of the Avoca River, The site is bounded by the town marsh to the south, M11 to the west, housing at Avondale Crescent/ Willow Grove/ Murrell Drive and St Joseph's School to the east and the Kilbride Industrial estate and Kilbride Road L-6179 to the north. The site slopes in a broadly north / south direction to the town marsh and Avoca river.

To the north there is also a national monument, the pyramid of Arklow; and its associated graveyard are located at the northernmost edge of the site at the highest point.

This pyramid has been well maintained over the years and was recently transferred by the landowner to WCC.

The site is located within close proximity to Arklow town and is within the vicinity of 3 no. existing bus services which are operated by Bus Eireann. The routes include Wexford Town – Dublin Airport; Gorey – Dublin Airport and Redmond Square – Dublin Airport. Arklow Train station is approximately 2.3km from the development and allows users to commute towards Dundalk, via Dublin City Centre (5 stops) and also down to Rosslare Europort.

The site is also located adjacent 2 no, future planned cycleways into the town designated by the NTA in the 2022 Greater Dublin Area Cycle Network Plan – one via the Kilbride Road to the north and a second via a Greenway route along the Shelton Abbey Lane via the Arklow Marsh.

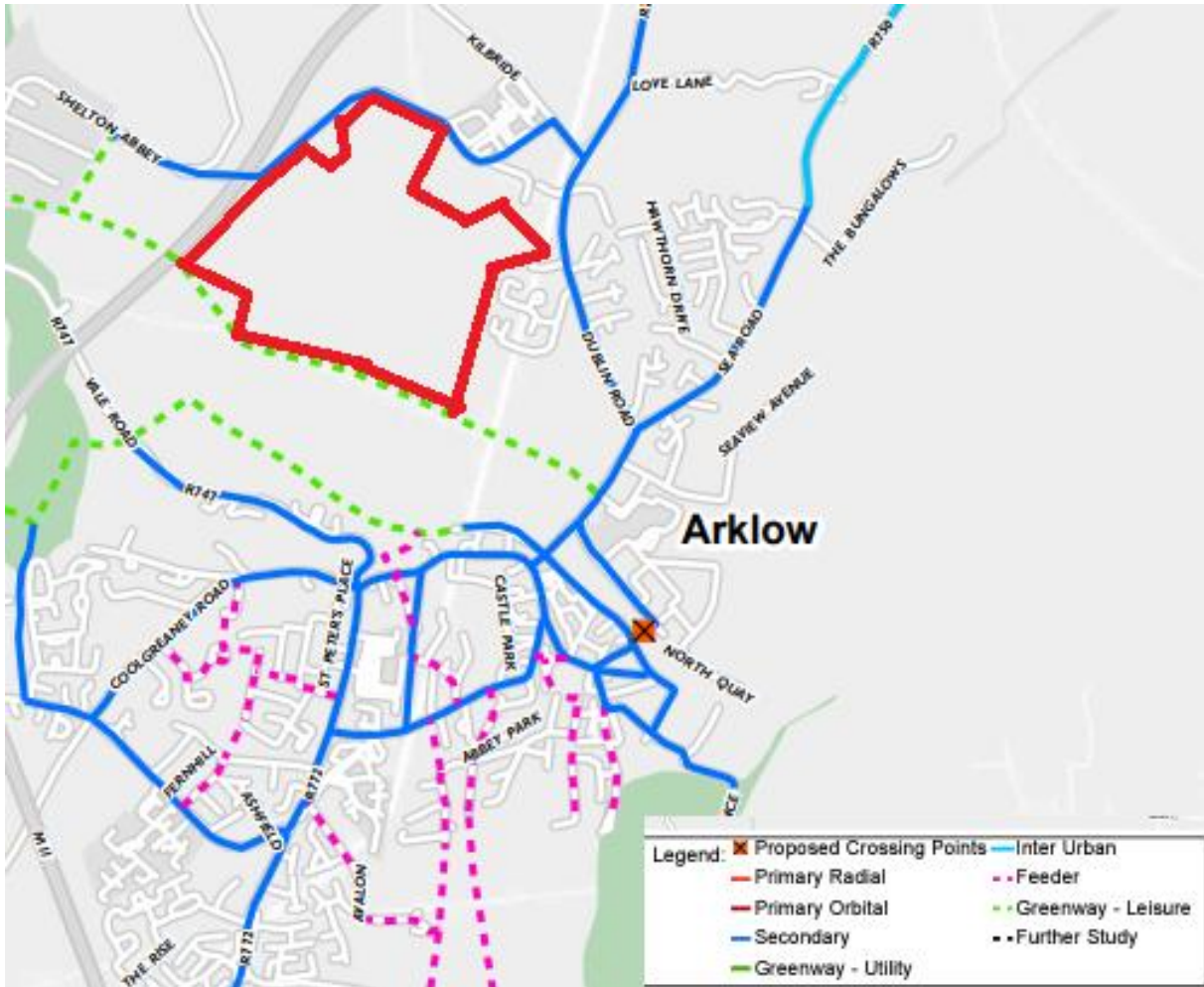


Figure 2 Extract of NTA Arklow Cycle Network Plan

The majority of the lands are currently greenfield and are used for agricultural purposes. There are hedgerows on site and several drainage ditches and small streams that lead to the Arklow Town Marsh pNHA (proposed Natural Heritage Area). A portion of the site, at the southern boundary, is within the Arklow Town Marsh pNHA (proposed Natural Heritage Area). This pNHA is one of 630 proposed NHA's which are non-statutory designations. The site is not located within a Conservation Area or an Architectural Conservation Area. There are currently 2 no. field accesses and 1 no. residential access onto the subject lands.

Arklow LAP

It is noted that the majority of our client's landholding has been zoned for residential development for some time, and dating back to the Arklow Environs LAP 2006-2012, almost 20 years ago.

It is understood that the lands were about to be brought forward for development at the time and indeed an Action Area Plan had been agreed with WCC in 2008 (See Figure 2 below).

However, like a lot of development sites at the time the subsequent economic crash significantly delayed the bringing forward of lands for development in the following years, and demand for significant additional housing in Arklow didn't return until the mid-2010s. Following this our client's gained control of the land and since the adoption of the current LAP in 2018 have sought to actively engage with the planning authority to progress the delivery of housing and supporting infrastructure on the lands.

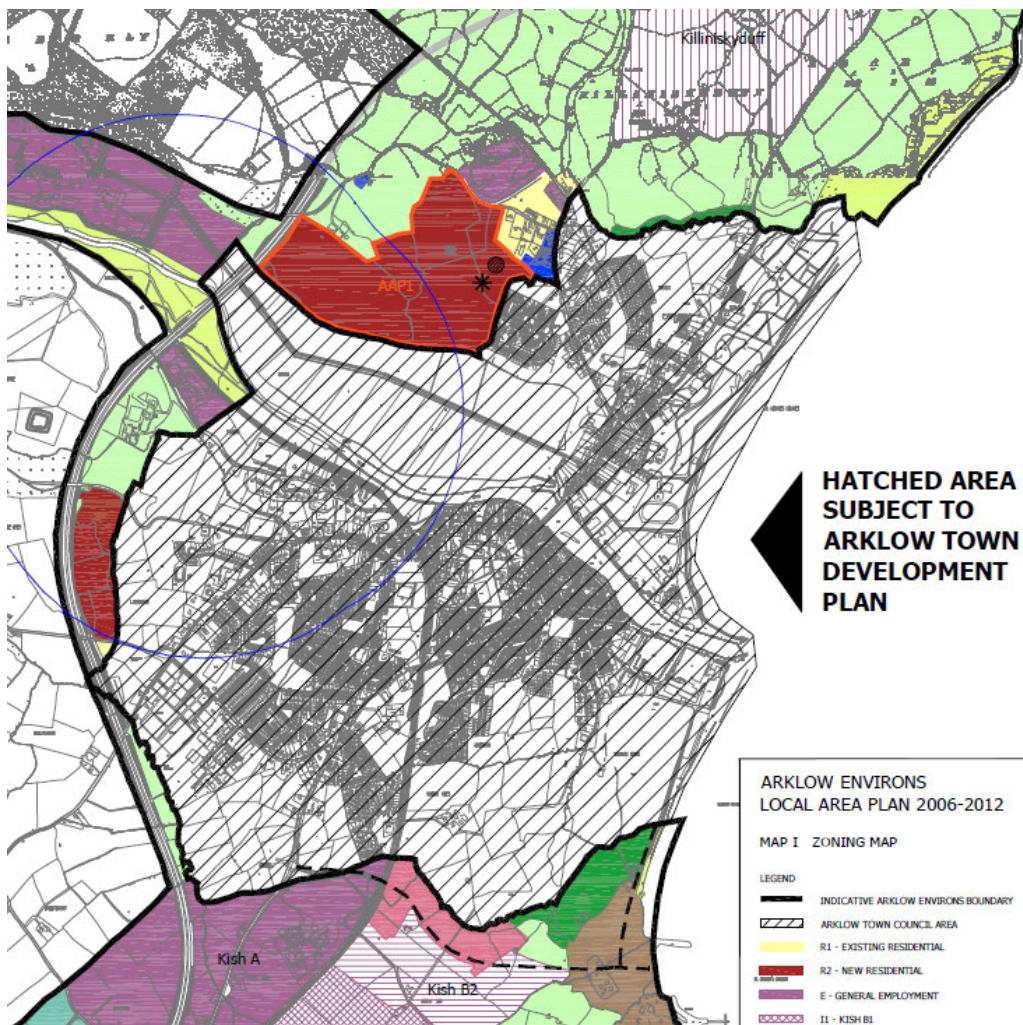


Figure 3 Extract from Arklow Environs LAP 2006-2012 indicating residential zoning for Kilbride

The current Arklow and Environs Local Area Plan 2018-2024 was adopted by Wicklow County Council on the 5th of February 2018.

The Arklow and Environs LAP has an objective to increase densities on existing zoned land where appropriate and to zone additional land for housing based on the principles of: applying a sequential approach whereby zoning is extended from the centre, contiguous to

existing settlement, promoting the concept of ‘walkable’ neighbourhoods, promotion of sustainable land use and transportation pattern, lands easily serviced by a gravity fed water supply system, providing upmost protection to the environment and heritage and the promotion of the development of lands adjacent to existing planning communities and social infrastructure.

The current Arklow LAP has a housing target of c.5,700 additional units between 2016 and 2028, which is a 100% increase on the current number of units in the town.

3,200 of these units (56% of the total) are identified within the 4 Action Area Plan locations designated at the outskirts of the town north and south. The remaining 44% are to be provided through a combination of brownfield, town centre, infill, waterfront and small opportunity sites.

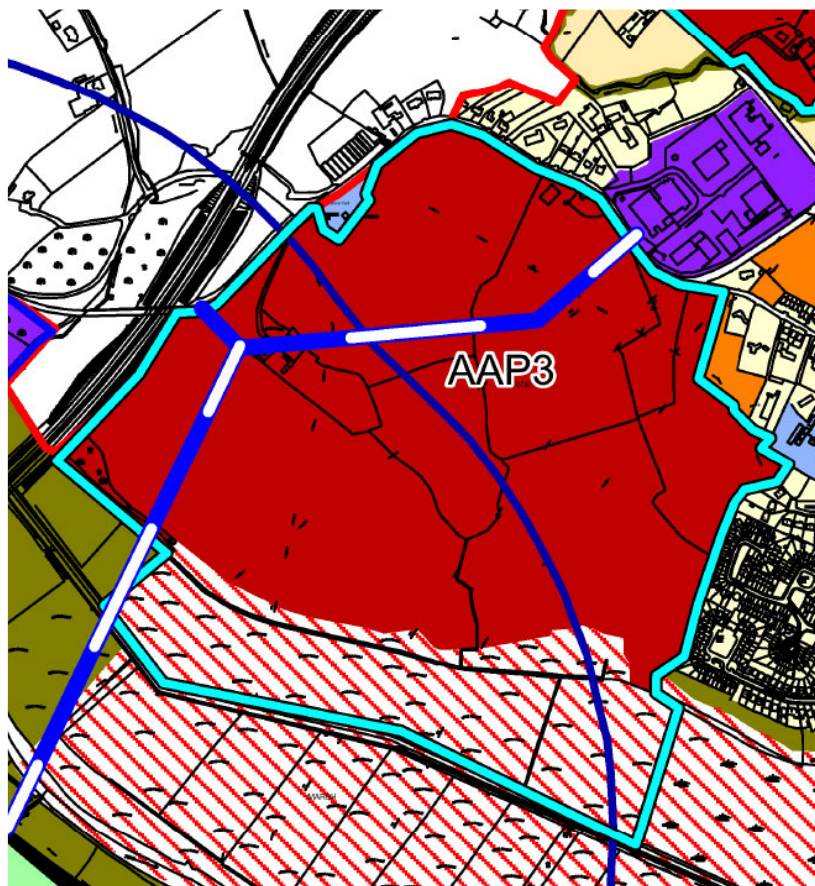


Figure 4 Extract from Arklow Environs LAP 2018-2024 indicating AAP3 lands for Kilbride

The subject lands are designated Action Area Plan 3 (AAP3) – Kilbride Lands.

The majority of the AAP3 lands are subject to a single zoning – “MU: Mixed Use” with the objective “To provide for mixed use development.”

The southern portion of the lands are zoned “Arklow Town Marsh”.

The following LAP objectives for Action Area Plans in general are noted:

- AAPs are to be the subject of comprehensive (not piecemeal) integrated schemes of development that allow for the sustainable, phased and managed development of the Action Area during the plan period.
- Separate applications for sections of each AAP will not be considered until an overall AAP has been agreed in writing with the Planning Authority unless it can be shown that any application will not undermine the achievement of the overall objectives for that Action Area Plan.
- The position, location and size of the land use zonings shown on the concept maps in the written statement are indicative only and may be altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out for the Action Area Plans.
- Any residential development occurring within an action area plan must be matched with the appropriate community / social and engineering infrastructure necessary to serve that quantum of housing.
- All large development proposals for Action Area Plans will require Local Transport Plans that illustrate that modal choice will be used in providing for local transport needs. Mobility Management Plans will be required for all significant commercial developments including enterprise, industrial and retail developments.

Kilbride (AAP3) is identified as the location of major development in Arklow; the growth of the settlement in accordance with regional plan targets is contingent on the delivery of the major residential, employment and community services development at this location. Along with Tinahask (AAP1 and AAP2), these two areas have been identified as the most suitable lands in the environs of Arklow for large scale development.

The following specific criteria is set out for the AAP3 lands.

- *A maximum of 1,500 residential units shall be provided, in a range of development formats, densities, unit sizes and designs;*
- *Vehicular access to the Action Area shall be provided from the L-6179 or from the Regional Road if it is possible, with the roads configuration of the development providing / facilitating a possible future third Avoca river crossing; other, secondary access routes from the adjacent road network shall also be provided as may be possible;*
- *A number of pedestrian access routes into the action area shall be provided where possible from adjacent developed areas;*
- *To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceeding 200 units), each containing materially different house designs within an overall unified theme;*
- *A minimum of 5ha shall be reserved for the provision of a school campus (CE Community and Education Zone) on lands zoned CE to the north east of the AAP, subject to consultation and agreement with relevant stakeholders, including the Department of Education and Skills;*

- *A local shops and services centre (LSS zone), of scale commensurate with the needs of the future population of the Action Area shall be provided, on a site of c. 1ha.*
- *A minimum area of 12ha shall be developed as public open space, of which a minimum area of 4.5ha shall be laid for active sports uses (AOS zone); remaining open areas shall be laid out as informal parks and walks, and shall include a minimum of 2 equipped children's play areas;*
- *The development shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure to serve the action area plan and local shops & services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space and strategic road infrastructure shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).*
- *Any development proposals shall have regard to the setting and curtilage of structures and sites of heritage value, and habitats of biodiversity value and appropriate buffer zones-/mitigating measures shall be provided as required.*

2.0 PLANNING HISTORY

SHD (Strategic Housing Development)

In 2018-2019 our client engaged with WCC in relation to agree an Action Area Plan (AAP) for the development of the lands, as required under the LAP. The AAP was agreed with WCC as per signed letter dated 18th April 2019.

Following this the applicant then progressed an SHD (Strategic Housing Development) proposal for a portion of the lands through pre-planning, first with WCC (under Section 247 of the Planning & Development Act) and then with An Bord Pleanála under Stage 2 – please refer to Figure 5.



Figure 5 Extent of Kilbride lands considered for SHD Application in 2019

The proposal was for a residential development of 759 residential units described as follows:

A mixed use residential development is proposed comprising 759 residential units, a local centre, and no. 2 crèches. The residential element will include:

- 515 no. two storey houses;
- 166 no. duplex apartments;
- 78 no. apartments;
- All of the residential units will have associated private open space/ balconies/ terraces facing north/ south/ east/ west elevations
- The proposed neighbourhood centre element is located to the centre of the development. In this area it is proposed to have two crèches, an anchor retail unit with two small commercial units.
- Provision of landscaping, open spaces and play area, including a new green route and pedestrian / cycle connection to Arklow town through the town marsh along the Avoca River to the south. The provision of a new playing pitch

for St Joseph's School as part of a land swap on the eastern boundary of the site. The provision of an additional access vehicular, pedestrian, cycle access route to the Dublin Road through St. Joseph's schools lands on the eastern boundary improving connections and reducing the distance to the town. Provision of the first section of the regional road from the Kilbride Road L-6179 allowing access to the site from the north.

- *All associated site development works, landscaping, boundary treatments and services provision. Including ESB substation.*

Amongst the queries raised by the Board was the issue of the wastewater infrastructural constraints associated with Arklow Waste Water Treatment Plant (WWTP) and associated network upgrade requirements which were yet to be constructed.

With the new WWTP still in planning at that time (and not ultimately granted until 2021) it was anticipated that An Bord Pleanála would not have been in a position to support the SHD application. It was therefore decided by the client to pause further progression of the SHD proposal until the WWTP was granted and significantly under construction.

School Campus Permission

In the intervening period, permission was granted by WCC to the Department of Education / Kildare/Wicklow Education and Training Board (KWETB) under Ref. 22/213 for a new educational campus within the Kilbride AAP lands and comprising a primary (480 pupil) and post-primary school (400 pupil) – please refer to Figure 5 below. We note that construction of these two schools is due to commence in 2024.

In granting permission WCC noted that the provision of the school campus accorded with the Action Plan agreed for the AAP3 area and with Phase 1 of same. The WCC Planner's Report, in responding to an NTA submission, also noted that the *"Kilbride area is earmarked for substantial residential development, which in due course would reduce the car dependency, as a % of students would be living within a short distance of the school. In addition, more importantly, increased cycle & pedestrian connectivity to the built up area of Arklow would be developed alongside that residential development."*

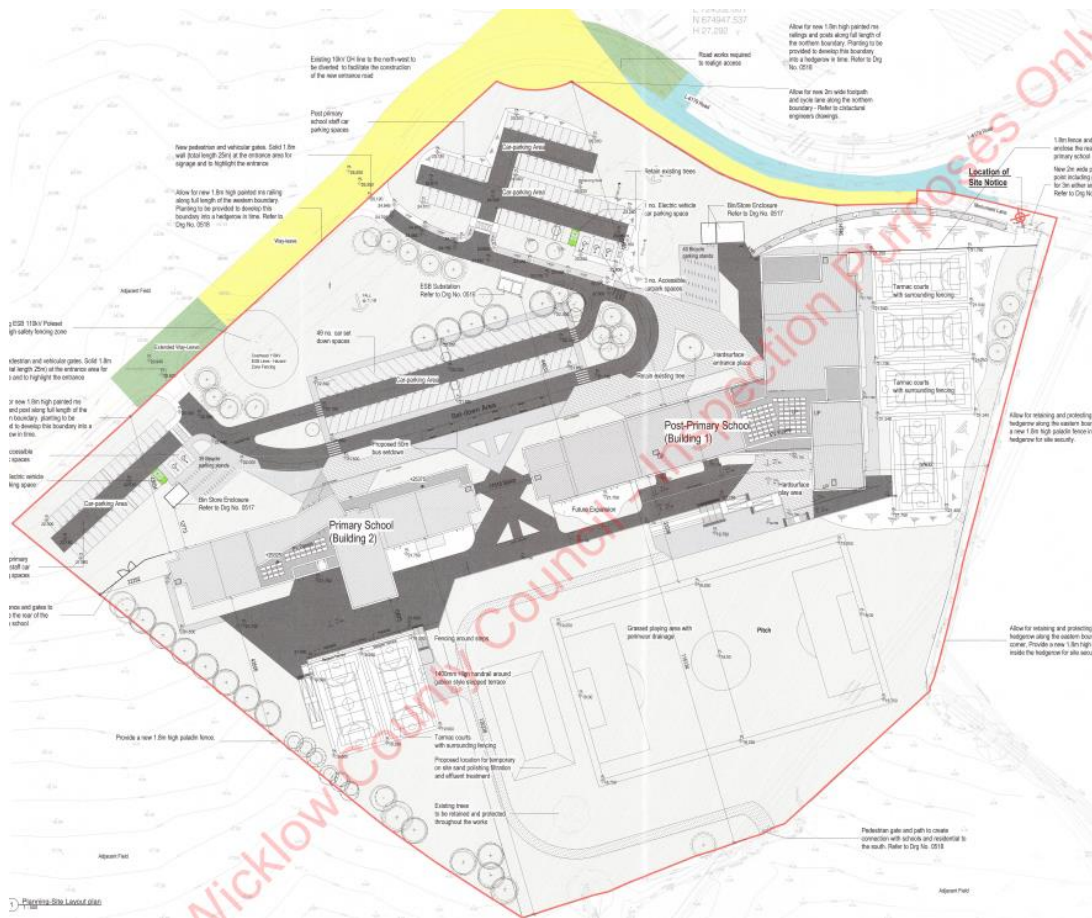


Figure 6 Site Plan for KWETB Primary and Post Primary Schools on Kilbride lands

Phase 1 Residential Development (86 Units reduced to 84 in response to the Further Information request)

In October 2023 our client submitted a first phase planning application on the Kilbride lands for 86 units, and as requested by WCC, also provided a detailed phasing plan for the entire AAP3 lands accompanied by a report which details how the phasing plan accords with the phasing requirements of the APP3 lands in terms of the provision of roads infrastructure, shops and services and active and passive open space provision and childcare provision – please refer to Figures 7 & 8 below.



Figure 7 Site Plan for 1st Planning Application on Kilbride lands



Figure 8 Masterplan submitted as part of 1st Planning Application on Kilbride lands

Following the submission of a Further Information Response, a Notification of Decision to Grant is expected in April and following a Final Grant our client will immediately commence development of the first phase of the Kilbride lands, and which in turn will support the commencement of the new school campus granted also.

LRD (Large Scale Residential Development)

In addition to the Phase 1 proposal, our client has just submitted a proposal for pre-planning under the new LRD (Large Scale Residential Development) provisions, for the development of the remainder of the AAP3 lands for c.1,420 units, along with new local centre, childcare, and associated services all in accordance with the AAP3 under the current LAP.

The proposed development will also include provision of a new pedestrian/cyclist route to Shelton Abbey Lane to the south-east and which provide connection to Arklow Town Centre beside the 19 Arches Bridge.

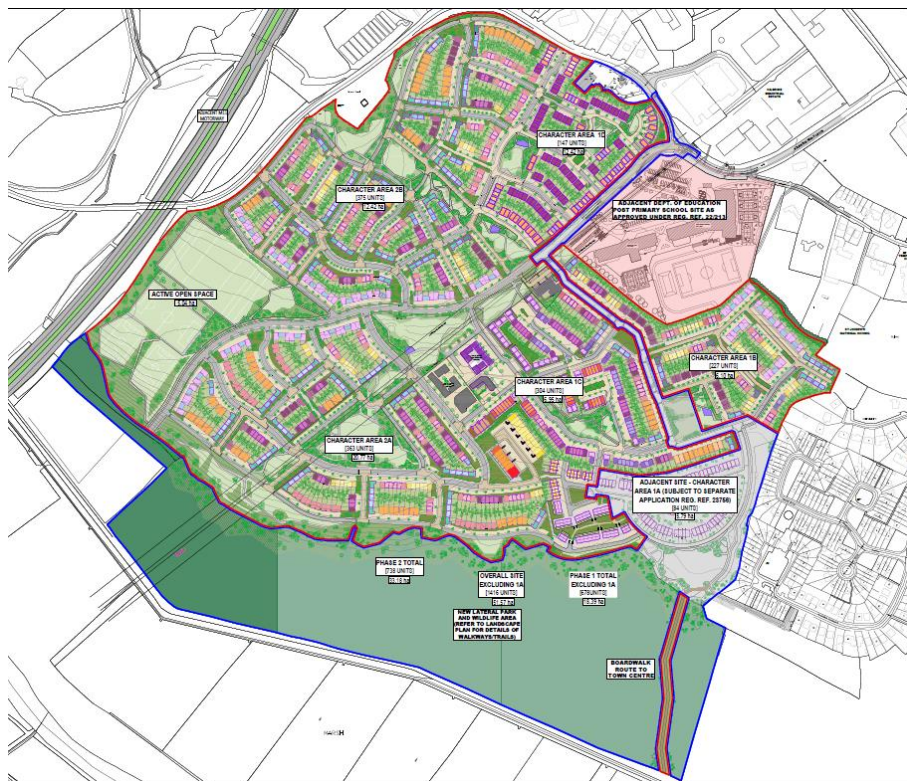


Figure 9 LRD Site Plan



Figure 10 LRD Landscape Plan



Figure 11 Proposed LRD Active Travel Connection from Arklow Town Centre

It is anticipated that the planning application will be submitted towards the end of this year.

Given these significant plans for the Kilbride lands our client is keen that the new LAP for Arklow provides the proper planning support to facilitate these developments.

3.0 GROUNDS OF SUBMISSION

THE NEW LAP FOR ARKLOW & ENVIRONS SHOULD NOT BE PREPARED UNTIL THE REVISION OF THE NATIONAL PLANNING FRAMEWORK IS COMPLETE AND THE CORE STRATEGY OF THE WICKLOW COUNTY DEVELOPMENT PLAN HAS BEEN UPDATED.

Minister O'Brien has been on record in recent years, that the National Planning Framework (NPF 2040), and the population projections underpinning same, have underestimated the population growth and housing demand for the country and these need to be revised.

The NPF 2040 was adopted based on ESRI population projections at the time (early 2010s) of an additional 1m population in the country by 2040. Subsequent projections are now suggesting that the 1m target will be reached by 2030, 10 years earlier. That is a significant variance which means that far greater population growth and housing targets will have to be factored into local and county plans going forward.

The Government formally commenced the process to undertake the First Revision of the National Planning Framework (NPF) in June 2023, and the process was scheduled to be completed in April 2024.

However, as recently announced (5th March) the government have agreed to the deferral of the approval of a revised National Planning Framework. This is primarily due to the fact that all of the necessary census data required to inform the NPF revision was delayed in publication due to the postponement of the census in 2021 due to the global pandemic.

As a result the planned update by the ESRI of their population growth projections to 2040, which informs the NPF, have been delayed.

When the ESRI projections and the NPF are updated, in turn the Core Strategy of the Wicklow County Development Plan will be required to be updated to reflect the revised population projections attributable to the County going forward.

With the current Core Strategy targets based on the 2016 Census figures and the now outdated NPF/ESRI projections, then the projections and growth targets for Arklow town in the current Core Strategy are likely significantly underestimated.

To proceed to adopt a new LAP prior to publication of the revised NPF and update to the County Core Strategy is futile and will result in the adoption of a LAP which is based on underestimated growth targets for the town and likely under provision of zoned land to deliver much needed housing for the town over the coming 6 years.

To complete and adopt the LAP in this way would be a retrograde and unsustainable measure in the midst of a national housing crisis.

Arklow is an important and well-resourced town in the south of the County and existing zoned residential lands must be retained in the new LAP and promoted for immediate development, not burdened with phasing restrictions based on inaccurate population projections.

NATIONAL PLANNING POLICY SUPPORTS THE ZONING OF ADDITIONAL LANDS IN EXCESS OF PROJECTED HOUSING DEMAND

In addition to the forthcoming planned NPF update, the current guidance from the Department of Housing, Local Government & Heritage also suggests that the local authority, have the discretion to maintain the current quantum of zoned residential lands in Arklow.

The local authority's attention is drawn to Section 4.4.3 of the Section 28 "Development Plans; Guidelines for Planning Authorities" (June 2022):

It states the following:

"In providing housing sites for development within settlements, it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand for that settlement. This approach recognises that a degree of choice in development sites to be provided locally is desirable to avoid restricting the supply of new housing development through inactivity on a particular landholding or site.

In making provision for housing within settlements in the core strategy of a development plan, in certain instances a planning authority may therefore provide zoned residential sites in addition to those required to meet the settlement housing supply target. This means that a planning authority, after identifying the site/land requirements to meet the housing supply target for that settlement, may also identify additional sites/lands to ensure sufficient choice for development potential is safeguarded.

Accordingly, on a settlement by settlement basis, the precise extent to which zoned lands and sites in excess of that required to match the agreed housing supply target are provided, may be determined by the planning authority. Such proposals will be assessed and evaluated by the Office of the Planning Regulator in accordance with these Guidelines.

As noted in the Guidelines above it is not a requirement that the quantum of zoned residential land adheres precisely to projected housing demand.

THE NEW LAP FOR ARKLOW & ENVIRONS MUST RETAIN ITS CURRENT ZONED LAND PROVISION TO ENSURE THE TOWN GROWS SIGNIFICANTLY OVER THE COMING YEARS

It is evident from the recently published 2022 Census results that the growth of Arklow completely stalled in the inter-censal period from 2016, at a time when all of the other main settlements in the County saw significant growth.

From Census 2016 to Census 2022 the population of Arklow grew by only 236 persons or 1.8% from 13,163 to 13,399.

During the same time the populations of other comparable settlements in the County grew dramatically – for instance, Wicklow/Rathnew grew by 17.8%; Greystones/Delgany by 21.3%; Newtownmountkennedy grew by 24.8%. Gorey, 15km to the south of Arklow in County Wexford grew by 17.3%

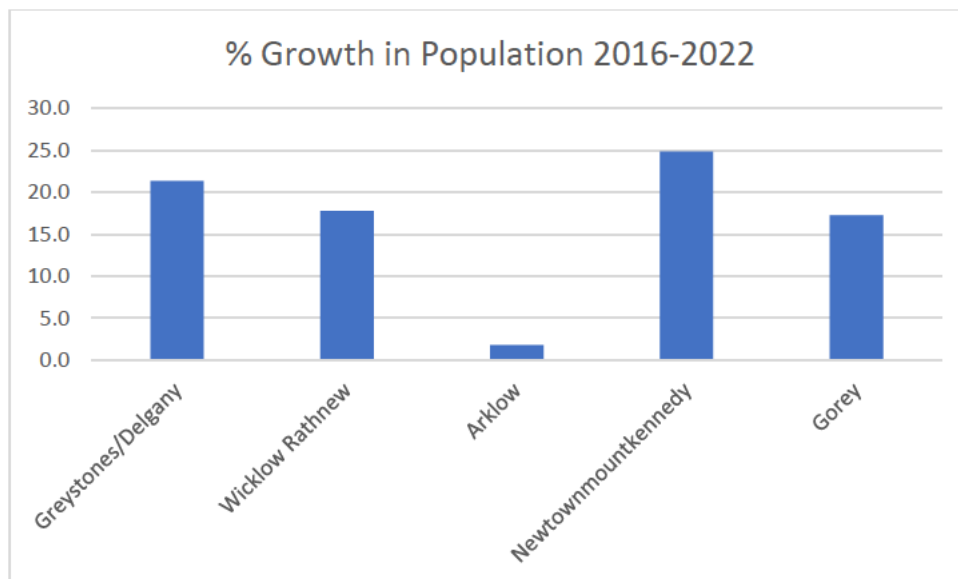


Figure 12 Inter Censal Growth Rate of Arklow and Adjoining Towns

The main reason for the stagnation in population growth in recent times is because new residential development has been withheld pending delivery of the Arklow Wastewater Treatment Plant, a proposal first mooted for the town in 1988, but which only received planning in 2021 and has been under construction since.

The opening of the WWTP next year, in 2025, and replacing the discharge of untreated wastewater to the Avoca River, will bring significant benefits to the town and surrounding areas in terms of health, environmental protection and improved water quality for all.

Furthermore the WWTP will allow Arklow to finally catch up with the growth experienced elsewhere in the County’s settlements and allow the town to properly achieve its role as a Self-Sustaining Growth Town with “continued commensurate growth” as designated in the Wicklow County Development Plan.

The new, state of the art, WWTP has been designed to provide a treatment capacity for a PE (population equivalent) of up to 36,000, which is almost 3 times the current population.

It is therefore critical that the new LAP does not impose unreasonable zoning or phasing restrictions on available development land.

THE NEW LAP MUST CONTINUE TO PROVIDE FOR DEVELOPMENT OF ARKLOW NORTH TO ACHIEVE BALANCED GROWTH ACROSS THE TOWN

As is noted in the current LAP, Arklow was originally established on the north side of the Avoca river by the Vikings in the 9th Century. Over time the commercial heart of the town developed south of the river away from the Marsh area.

In modern times, the town's outer boundary was newly defined with the opening of the N11 by-pass in 1999, and with new residential estates, principally to the south and west of the town centre extending out towards the by-pass.

Whilst there has been some sequential development north of the river in modern times, this has been significantly less than in areas south and south-west of the town centre.

As a result the distribution of population and services has been skewed south of the town. North Arklow/Ferrybank represents only 22% of the total population of the town (Census 2022).

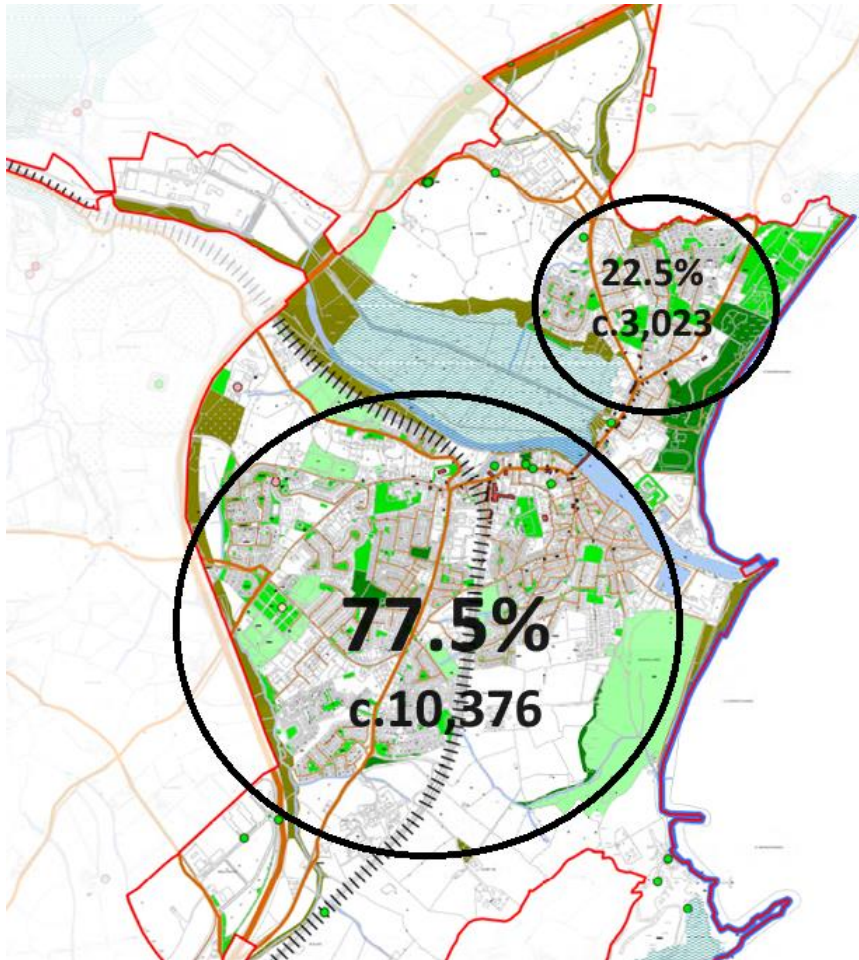


Figure 13 Distribution of Arklow Population

The Kilbride lands is the main landholding to deliver sustainable and self-sufficient residential growth in North Arklow. The first phase of this (86 units) will shortly commence and in tandem with the first phase of the new distributor road for AAP3 and new pedestrian/cyclist connection to the Dublin Road into the town centre.

Furthermore pre-planning has been submitted for an LRD development on the remainder of the AAP3 lands for c.1,420 units, and a new local centre, childcare, and associated services, completion of the distributor road within the AAP3 lands and provision of a new pedestrian/cyclist route to Shelton Abbey Lane providing direct connection to Arklow Town Centre.

The AAP lands are considered Tier 1 Lands as per the National Planning Framework (NPF), in comprising “served zoned land” that are able to connect to existing development services, for which there is service capacity available (e.g. WWTP to be opened in 2025) and can therefore accommodate new development. The lands are located “contiguous to existing developed lands” and are spatially sequential to the existing built up area of North Arklow. The positive

consideration of WCC in relation to the school campus and first phase residential demonstrate this also.

In accordance with the Key Priority for “Key Towns and Large Towns” in the 2024 Section 28 Guidelines “Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities”, the development of AAP3 will also deliver a sequential and sustainable urban extension at a location adjacent the built up area and which can be integrated into the existing built up footprint of the settlement,

Given the above it is therefore critical that the new LAP does not sacrifice continued growth within North Arklow in favour of further growth south of the town which will only exaggerate the current spatial and population imbalance.

WCC are requested to retain the AAP3 designation and zoning for our clients lands in order to ensure that the masterplan can be achieved and the balanced, sequential growth of Arklow north of the Avoca, be sustained.

THE AAP3 LANDS AT KILBRIDE SHOULD BE GIVEN HIGHER PRIORITY THAN AAP1 & AAP2 LANDS

Under the current LAP our clients land at Kilbride (AAP3) are identified “as the location of major development in Arklow; the growth of the settlement in accordance with regional plan targets is contingent on the delivery of the major residential, employment and community services development at this location. Along with Tinahask (AAP1 and AAP2), these two areas have been identified as the most suitable lands in the environs of Arklow for large scale development.”

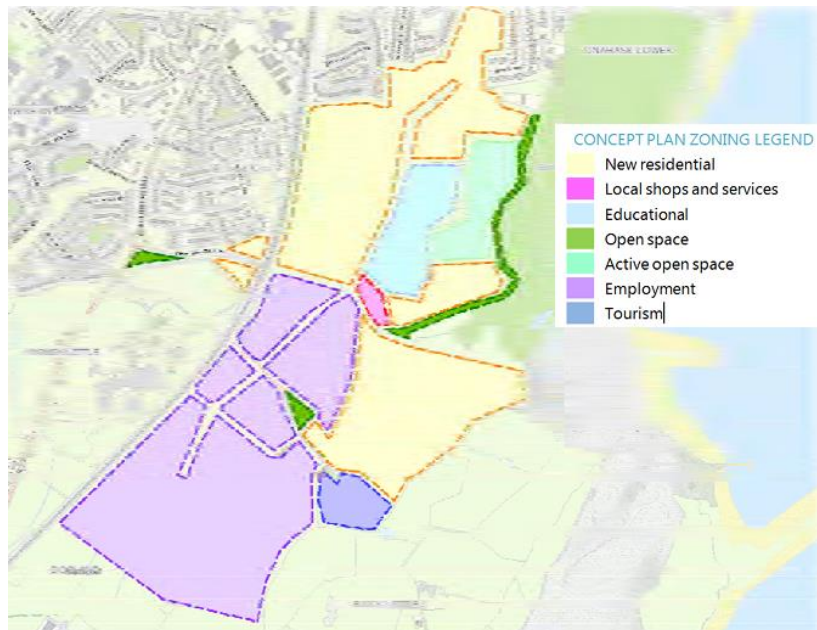


Figure 14 AAP1 and AAP2 Lands

The AAP1 and AAP2 land at Abbeylands, Money Big/Boglands south-east of the town are in separate ownerships, but also designated for significant residential development, as per AAP3, as well as employment and significant social and physical infrastructure.

However the AAP1 and AAP2 lands were given a higher priority (2) than AAP3 Kilbride (3) and are promoted for development in advance of AAP3.

This is despite the fact that the current LAP acknowledges that there is currently no access point available from the existing built-up area to the AAP1 lands.

While the LAP states that the Local Authority will endeavour to determine or provide a new route to the AAP1 lands no such road has been progressed during the life of the LAP.

The alternative access via the AAP2 lands to the south is in turn hampered by the fact that those lands are also severely hampered by a below standard railway bridge access to the Knockmore roundabout.

In addition, the LAP also requires that the development of these lands will also require a new distributor road through the lands to the employment lands to the south, and also to provide a new 'port access road' which is deemed an essential piece of road infrastructure for the wider town to remove port bound traffic from the main street and town centre.

The site history of both Action Area Plan areas indicate no planning application being submitted or granted on the lands over the past 10 years or during the life of the LAP.

Furthermore, it is noted that that no public funding (e.g. LIHAF) has been secured for the provision of new public roads into/through these lands.

As such it appears, notwithstanding the granting of permission for the WWTP upgrade and construction, that the AAP1 and AAP2 lands are being severely constrained by the significant road infrastructure improvements that are required to open up these lands and make them accessible.

Similar constraints do not occur at the Kilbride lands where direct access to the existing public road is available via the proposed new link which will also serve the planned school campus. In addition, new pedestrian/cyclist connections are being proposed to provide additional sustainable connections with adjoining residential estates. This is all possible because the entire Kilbride lands are in single ownership.

The rationale for designating the AAP3 lands at Priority 3, behind Priority 2 AAP1 and AAP2 lands was that the Kilbride lands *“are more distant from the town centre and the majority of higher order services that are located to the south of the river. While it is noted that there are local shops and services to the north of the river and indeed a new major shopping centre on the north quay, this is not considered sufficient justification to promote new development lands in AAP3 and AAP4 above lands to the south of the river. “*

But this rationale no longer stands up 6 years later in light of the planning progression that has and is being made at AAP3 whilst AAP1 and AAP2 lands remain in limbo.

As noted above, a residential development of 86 units within AAP3 is about to be granted permission and along with the new school campus (to be commenced later this year) will establish a significant first phase and will also deliver a significant portion of the designated strategic road, and also a new pedestrian/cyclist access point, providing for improved connectivity and proximity to the town.

The next LRD planning application including a new local centre along with new parks, recreation areas, childcare facilities, etc will provide for the completion of the AAP3 lands with significant social infrastructure delivered in tandem with the new housing, and with a new purpose built school campus on its doorstep.

Given the above we contend that the AAP3 lands should be given equal or higher delivery priority than the AAP1 and AAP2 lands in the new LAP to reflect its development progression to date and which will continue rapidly over the coming years.

THE NEW LAP SHOULD REMOVE THE REQUIREMENT FOR A STRATEGIC ROAD BRIDGE FROM THE AAP3 LANDS ACROSS THE AVOCA RIVER

The current LAP notes the requirement, in the long term, for the construction of a new vehicular bridge across the Avoca and Marsh between the 19 Arches Bridge and the M11 in order to alleviate traffic congestion into/out of the town centre.

Infrastructure, transportation & movement objective IT5 states an objective; *“To facilitate the provision of a western distributor route in order to provide alternative movement routes through the town. The route, which will be subject to route option assessment, will incorporate a new river crossing, linking Kilbride to the Vale Road, Lamberton Avenue and on to the Coolgreaney Road.”*

However, as acknowledged in the LAP, *“such a crossing would require significant investment, given the distance it would have to span across the marsh and river and **may be seen as a longer term goal**. However, in order to facilitate and stimulate the delivery of this objective, lands have been zoned for significant development at Kilbride, at the northern side of this possible link. Similarly, the development of these lands will be dependent on the delivery of part of this route by developers.”*

In accordance with the above objective our client has incorporated the IT5 Distributor Road proposal, as it relates to its Kilbride lands, within the Masterplan for AAP3. Furthermore the first phases of development in AAP3 (the school campus and 86 unit scheme) have included the first phase of the new distributor road.

The current LRD proposal for the remainder of the lands includes completion of the remainder of the Distributor Road within AAP3 as far as the boundary with the Arklow Marsh.

However the current LAP also places a development restriction on the AAP3 lands tied to the delivery of the Avoca River bridge further south on lands outside the control of client.

Appendix D places a limit of no more than 75% of the residential component of AAP3 to be delivered before the strategic road infrastructure including the river bridge. In other words c.375 residential units, along with 12ha of public open space (including 4.5ha of active sports) are all to be withheld.

Appendix D (Phasing & Implementation) states that *“the full development of these lands is dependent on the construction of a new ‘western distributor road’ and a new Avoca River bridge, in order to avoid additional pressure on the existing ‘19 Arches’ Bridge; the provision of such an alternative route will also allow for potential traffic re-routing of the town centre and allow for improvements for pedestrians and cyclist to be made in the town centre. This is however a longer term objective, as the road and bridge have yet to be designed, approved and funded.”*

We agree that the delivery of a new road bridge across the Avoca will be a significant engineering and funding challenge that only may be deliverable in the longer term and likely outside the timeline of the next LAP and County Development Plan.

Suggested costs could be in the region of €20 - €30m. Furthermore there is no state funding mechanism in place to help part fund the bridge. The bridge was not proposed by WCC in separate rounds of URDF funding during the life of the current LAP.

It is considered unreasonable that the full development of the Kilbride AAP3 lands, as now detailed in the Masterplan should be withheld, potentially indefinitely, pending delivery of this bridge.

The current LAP does not substantiate how the development of the final 375 residential units within AAP3 would breach a threshold of traffic impact across the wider town that would necessitate the delivery of this strategic bridge.

The impact on traffic congestion within the town centre and across the 19 arches bridge is caused by a number of factors.

Domestic/residential traffic from North Arklow to access services and education in South Arklow is just one factor. Commercial access to retail, commercial and industrial businesses in Wicklow Town Centre and Arklow Port and along the waterfront is another. A third source, particularly in the summer months, is visitor traffic into the town.

Within several areas of Arklow identified for significant residential development, including the town core itself, it makes little sense that the proper completion of the AAP3 lands would be unduly restricted pending delivery of the bridge. Particularly given that any commuter traffic generated from this proposed development would more than likely travel north out to the motorway rather than through the site given its location proximate to the Arklow North junction.

We include a Transport Appraisal prepared by Systra Transport Engineers which reviews the necessity for the road bridge in the longer term, given updated national and regional transport policy, and whether an active travel or public transport crossing may ultimately be more suitable.

The report also provides an overview of the land use and transport implications of the AAP3 lands bearing in mind the inclusion of significant social infrastructure as part of its development including primary and post-primary school, childcare, recreational uses, and a new local centre with retail and other services.

The AAP3 Masterplan can clearly deliver the “10 minute neighbourhood” in which the residential community will have community facilities and services accessible within a 10

minute walk or cycle from homes, thereby reducing the need for car usage for everyday needs.

Given the above, it is contended that whilst the new LAP may require the retention of an additional “crossing” of the Avoca in the long term, it is unreasonable that the full delivery of the AAP3 lands should be restricted pending its delivery. The AAP3 lands are designated to include the majority of the day-to-day needs (such as food, healthcare, education, sports etc) within this new community and a short walk time from all new homes.

In other words this new community will not create the significant demand for this additional strategic bridge.

If the bridge objective is to be retained in the new LAP then it should be de-coupled from the phasing of AAP3 and included as a separate objective for the benefit of the wider town, and the delivery of which will need to be funded through a combination of the State, WCC and most likely a specific development contribution scheme attributable to all new developments across the town going forward.

4.0 CONCLUSIONS AND RECOMMENDATIONS

“I believe that we need more land zoned. I’ve told all of our local authorities through the development plans that no zoned service land should be de-zoned.”

(Minister for Housing, Darragh O’Brien as reported at the launch of Respond’s Annual Report, Oct 2022)

As it stands, the Core Strategy of the Wicklow County Development Plan, 2022-2028, is based on out of date and significantly under-estimated population and housing figures and growth targets for all of its settlements including Arklow.

Once the NPF population growth targets have been revised, based on the 2022 Census results and revised ESRI projections, then the Core Strategy will have to be updated by WCC. This in turn will require the updating of related LAPs and town plans throughout the County.

Given the above, whilst our client acknowledges the need to commence the pre-draft stage for a new LAP in 2024, it makes little sense that the planning authority would hasten the drafting and subsequent adoption of a new LAP prior to revised and correct population targets attributable to Arklow being confirmed. The foundation of the LAP will be based on inaccurate information.

Furthermore, with the drafting of the new LAP it is critical that the development objectives for the town north of the Avoca River are not abandoned to the preference of further

development south of the town centre. Such measures will lead to continue the disproportion growth of the town southwards which is contrary to proper planning and development.

The development of the Kilbride lands is to the benefit of Arklow town overall, in securing its “Self-Sustaining Growth Town” designation in the County Development Plan with “continued commensurate growth”, and also in compliance with national and regional planning policy, including National Policy Objective 5 which supports the development of towns of sufficient scale and quality to compete and be drivers of regional and national growth, investment and prosperity.

It is critical that the Kilbride lands, which have been designated for significant residential development over consecutive LAPs, and for which the first phase of development is due to start shortly, therefore retains its designation and full zoning for housing and social infrastructure in the new LAP

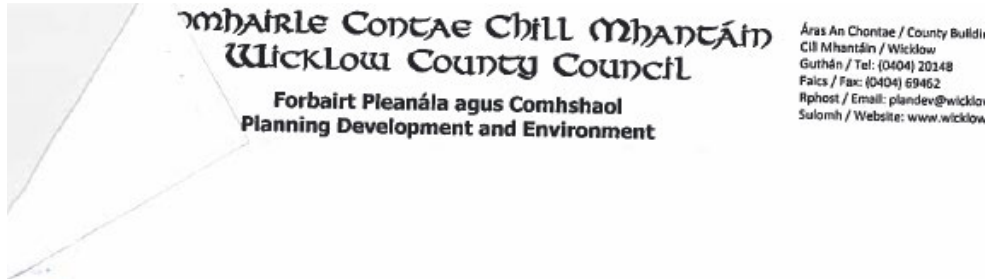
Yours sincerely,



Trevor Sadler
MCG Planning Ltd.

APPENDIX A

Copy of WCC Approval for AAP3 from 2019



McGill Planning,
Chartered Town Planners,
45 Herbert Lane,
Dublin 2.

2nd April 2019

Re: **Action Area Plan for Action Area Plan No 3, Kilbride, Arklow,
Co. Wicklow**

Dear Sir,

I refer to the Action Area Plan for Action Area 3, Kilbride, Arklow, Co. Wicklow and wish to inform you that the Action Plan has been approved by Wicklow County Council in accordance with the documents received from yourself on the 8th February 2019 subject to the recommended amendments. The agreed Action Plan is available for inspection at the Planning Counter at Wicklow County Council, County Buildings, Wicklow. I attach a copy herewith.

Planning applications may be submitted in relation to this area. Any application must take cognizance of this Action Plan and also all relevant development control standard policies within the County Development Plan 2016-2022 and the Arklow and Environs Local Area Plan 2018 as applicable.

Yours Sincerely,


Theresa O'Brien,
Senior Executive Officer
Planning, Development and Environment.





WICKLOW COUNTY COUNCIL

Approval of Action Area Plan No. 3 Kilbride, Arklow, Co. Wicklow

Context

This approval refers to Action Area Plan No. 3 Kilbride, Arklow. This Action Area Plan is based on documents submitted by Mc Gill Planning Limited on behalf of Declan Taite, receiver over certain assets of Windhill Properties Limited and Dawnhill Properties Limited, c/o Duff and Phelps on the 08th February 2019.

Any application within Action Area 3 must take cognisance of this approved Action Area Plan and all relevant development control standards / policies within the Wicklow County Development Plan 2016-2022 and any subsequent County Development Plans, and the Arklow and Environs Local Area Plan 2018 and any subsequent Plan, as applicable.

Approval

Action Area Plan No. 3 Kilbride is approved in accordance with the submitted AA3 plan subject to the following:

- a) The development of the Kilbride Action Area shall be carried out in a minimum of 2 phases as set out in the submitted AAP and shall have regard to the Spatial Development Strategy and Infrastructure Delivery Schedule set out in the Arklow and Environs Local Area Plan.
- b) The development of the Kilbride Action Area shall be linked to the provision of both physical infrastructure (e.g. access roads, footpaths, services etc) and social infrastructure (e.g. local services centre, school campus, open spaces, crèche facilities etc).
- c) Any application for development in the Kilbride Action Area shall be subject to a full Traffic and Transport Assessment and design analysis as part of the planning application process. Such an assessment would have to examine the possibility of providing a pedestrian/cycle link to the 19 Arches Bridge in Arklow Town Centre as part of Phase 1 and at a minimum following the completion of the first 250 dwellings and would have to support the provision of the indicated road link to the R772 at Templeraíne. In this regard, it should be noted that the approval of this Action Area does not mean that the access strategy/proposals submitted are approved by the Planning Authority in their entirety.
- d) Any planning application for development in the Kilbride Action Area shall include a full ecological assessment of the impact of the proposed development on the Arklow Town Marsh (pNHA) which is an important natural heritage asset to the town being the principal wetland habitat in the area, providing an important flood control role and supports a variety of plant and animal life, in particular reed species and bird life.
- e) No dwelling shall be occupied within the Kilbride Action Area until the proposed new Arklow Wastewater Treatment Plant is fully operational.
- f) The development of these lands shall be to the highest quality of layout and design, in accordance with the standards set out in the Development and Design Standards document appended to the Wicklow County Development Plan 2016-2022 and the Urban Design Manual, 2009, the Design Manual for Urban Roads and Streets, etc.

Disclaimer

The approval of this Action Area by Wicklow County Council in its role as Planning Authority does not commit it to the provision of services

The Planning Authority does not take responsibility for the accuracy of the documents submitted as part of this Action Area

The Planning Authority reserves the right to agree modifications to the Action Area Plan, where appropriate, in the interests of proper planning and sustainable development.



Marcus Linehan
Executive Planner
18/04/2019

Agd T. Maguire
12/05/19

APPENDIX B

Copy of WCC Approval for Kilbride Lands in 2008

Kilbride AA1 May 2008

KILBRIDE ACTION AREA 1 APPROVAL DOCUMENT

1.1 Introduction

This agreement refers to the Action Area Plan 1 for lands at Kilbride, Arklow, submitted on the 19th October 2007, which was superseded by the revised document submitted on the 07th February 2008 by PD Lane Associates on behalf of Cova Properties. The schedule of relevant documents, which form part of the approved Action Area Plan for this action area is contained in Appendix 1.

The lands included in the action area are owned by 4 separate owners. The majority of the lands are owned by Dawnhill Properties Ltd., which is managed by Cova Properties, on whose behalf the action area was submitted. Dawnhill Properties Ltd. own adjoining lands to the south of the action area and Windhill Properties (also managed by Cova Properties) own adjoining lands to the NW of the action area. Part of these lands are indicated to be available for development as part of the action area. It is indicated that all owners are in agreement with the submitted action area plan.

Any application within the Kilbride Action Area 1 must take cognisance of this approved action area plan and also all relevant development control standards/policies within the Wicklow County Development Plan 2004 and any subsequent County Development Plans, and the Arklow Environs Local Area Plan 2006, and any subsequent Arklow Environs LAP, as applicable.

1.2 Zonings

The area of land included in the Kilbride Action Area is approximately 48Ha. The lands are zoned "R2 New Residential".

The zoning requires the reservation of an appropriate site for an additional primary school and secondary school.

The zoning allows for a neighbourhood centre to include a supermarket with approx. net floor area of 3,500m² plus smaller retail and service units.

A map titled "Action Area Detail Plan" submitted on the 07th February 2008 outlines the location and size of the different types of development/use, which are as follows:

- Local Centre, circa 6 acres
- Residential, circa 115 acres
- Public Park, circa 3.5 acres
- Primary School site, circa 3.5 acres
- Secondary School site, circa 12 acres
- Natural Amenity, circa 37 acres

The development of the Kilbride Action Area shall generally accord with the location and scale of the zonings/uses shown on the Action Area Detail Plan submitted on the 07th February 2008 subject to the following:

- a. Residential densities shall comply with S 6.2.1 of the Arklow Environs Plan 2006, which specifies a minimum density of 35 units per hectare.
- b. Prior to the submission of the first planning application for development an Educational Needs Report shall be submitted to and agreed in writing with the Planning Authority to allow for the size of the site to be reserved for the primary school to be established.
- c. Prior to the submission of the first planning application for development a Design Report in relation to the secondary school shall be submitted to and agreed in writing

1

M/L/08

Kilbride AA1 May 2008

KILBRIDE ACTION AREA 1 APPROVAL DOCUMENT

with the Planning Authority. This report shall examine the suitability of the proposed site for the construction of a 1000 pupil secondary school, including playing fields, having regard to the topography of the site and any related visual impacts, accessibility to public transport and proximity to necessary services and facilities.

- d. The scale of the Local Centre shall have regard to its role as a neighbourhood centre, the proximity of Arklow Town Centre, existing development in the area, and the Retail Planning Guidelines for Planning Authorities.
- e. Prior to the submission of the first planning application for development an Active & Passive Open Space Report shall be submitted to and agreed in writing with the Planning Authority to allow for the scale of the Public Park and its design and content/layout to be established to ensure the future population generated by the development of the action area is catered for in the interests of sustainable development. Regard should be had to the Council's Active Open Space Policy (2007).

1.3 Phasing

The development of the action area shall be carried out in three phases as detailed under the phasing heading of Section 3 of the submitted plan and shall be in accordance with the following:

- a. Phase 1 shall include a maximum of 550 residential units, a minimum of 30% of the Public Park, the making available of the land for the secondary school and the primary school and all or part of the Local Centre.
- b. Phase 2 shall include a maximum of 850 residential units and a minimum of 75% of the Public Park.
- c. Phase 3 shall include all remaining development.
- d. No planning applications should be submitted for development in any phase until the Sanitary Authority has confirmed in writing that an adequate water supply and sewage treatment system can be provided for all development in that phase.
- e. No planning applications should be submitted for development in any phase until the Road Authority has confirmed in writing that the road network will be adequate to cater for the traffic generated by development in that phase.
- f. No development can commence until the Planning Authority confirms in writing that the route for the Arklow Western Distributor Road has been determined or that the development of the action area would not compromise the provision of the Arklow Western Distributor Road.
- g. No development can commence in Phase 2 until the Planning Authority confirms in writing that it is satisfied that sufficient progress has been made in relation to the provision of a primary school & secondary school as may be required.

A 9/6/08

Kilbride AA1 May 2008

KILBRIDE ACTION AREA 1 APPROVAL DOCUMENT

- h. No development can commence in Phase 3 until the Public Park in Phases 1 & 2 has been completed to the written satisfaction of the Planning Authority

The above phasing has been developed to ensure that the development of the lands in the Kilbride Action Area 1 is in accordance with the proper planning and sustainable development of the area and to ensure that adequate physical public infrastructure and social infrastructure/community facilities are available for the use of all future occupants and users of the subject developments. Any planning applications for development on these lands may be subject to additional phasing criteria, which are considered appropriate at that time.

1.4 Residential Development:

Development of residential units shall be of a high standard of design and layout. To this end, any application should take cognisance of the Residential Development Control Standards of the Wicklow County Development Plan 2004 (as may be varied or revised) and the Residential Density Guidelines for Planning Authorities published by the Department of Environment (1999) and the Sustainable Residential Development in Urban Areas draft Guidelines (2008).

In particular to achieve a sense of place and allow for visual diversity any residential application should provide for materially different house designs within an overall unified theme. An appropriate mix of dwelling types should be proposed, not just within the overall development, but throughout the development to:

- i. reduce the dominance of detached and semi-detached house types in suburban areas.
- ii. provide for all aspects of the market.
- iii. enable householders to move into a smaller house in the immediate proximity when circumstances reduce the household size, and thus release a larger house to the market.

To ensure a high standard of design and layout, particular regard should be had to the topography of the Kilbride Action Area 1. To this end, it will be necessary to show that the design of the development does not form an incongruous/intrusive feature on the landscape and that usable gardens and public open spaces and driveways with acceptable gradients can be provided.

Driveway gradients must be less than 1:7 and levels of the base and the top of the slope (allowing for a 1m shallow gradient area adjacent to the house, and footpaths/grass verges with a maximum 1:33 gradient) must be provided.

Rear gardens and public open space must have a slope less than 1:10 in any direction, and the heights of any retaining walls necessary to achieve this should be clearly shown. If it is proposed to terrace the rear garden with a slope of maximum 1:2, only half the plan length of the terrace-slope can be taken when computing the required 11m length of rear garden.

Structures on the higher parts of the Action Area, shall be designed to minimise intrusion on the landscape, shall not break the skyline and shall not be particularly visible or prominent when viewed from the N11 and Arklow Town.

The design of residential areas shall reflect Irish / local design concepts

1.5 Open space

Open space within residential developments shall be provided in tandem with each phase of residential development, at the rates set out in the County Development Plan 2004 (as may be varied or revised). A reduction in the provision of public open space within each residential

A. J. O'Connell

Kilbride AA1 May 2008

KILBRIDE ACTION AREA 1 APPROVAL DOCUMENT

development may be allowable having regard to the provision of the Public Park within the overall action area.

This open space must be laid out to provide for useful spaces and should be provided with pedestrian and cycle paths of suitable gradients, seating areas, outdoor furniture and litterbins. Open spaces shall be attractively landscaped by contouring and planting of tree and shrubs and flowerbeds where appropriate. All local open spaces shall be dedicated to the use of the residents for residential, amenity and maintenance purposes.

The design of the Public Park shall comply with the Council's Active Open Space Policy document (2007).

1.6 Services

All water supply networks, surface water drainage arrangements and foul sewer networks shall be designed and constructed in accordance with the requirements of the Sanitary Authority of Wicklow County Council.

It should be noted that at present there is no sewage treatment plant in Arklow. Therefore prior to the discharge of sewage to the public sewer all sewage is required to be treated. The Planning Authority does not consider the provision of private treatment plants for residential developments to be acceptable or sustainable and on this basis the Planning Authority would not be in favour of any residential development in the action area, which was reliant on a private sewage treatment plant.

The need for, the location and the size of any on site water reservoir shall be in accordance with the requirements of the Sanitary Authority.

1.7 Roads and Access

- (a) A distributor road shall be provided through and/or adjacent to the Action Area. This road shall form part of the Arklow Western Distributor Road and shall allow for the connection of the Old N11 north of Arklow to the Vale Road to the south of the Avoca River. The route/corridor of this distributor road shall be determined prior to the commencement of any development in the action area to ensure that the determination of a route is not compromised.
- (b) All internal road layouts, width, gradients, paths and turning areas shall be designed having regard to "Recommendations for the site development works for Housing areas" DOE 1998

1.8 Transport

- Cycleways shall be provided on all spine routes through the development and along the public road frontage of the site in accordance with the requirements of the Road Authority.
- Provision shall be made for bus bays along the public road boundaries of the site and along the Distributor road, with adequate pull-in and pull-out lanes. Provisions shall be made for footpaths of adequate width along bus bays to allow for the future provision of a bus shelters without impeding the pedestrian path or cycleway.
- Adequate pedestrian and vehicular connections shall be provided to Arklow Town to ensure that developments can be linked to existing services.
- The development shall comply in all other regards, where appropriate, with the policies and strategies contained in the Arklow Environs Integrated Framework Plan for Land Use and Transportation.

1.9 Environmental

AS 4/6/08

Kilbride AA1 May 2008

KILBRIDE ACTION AREA 1 APPROVAL DOCUMENT

Section 5.5 of the Arklow Environs LAP 2006 includes the requirement that "the *Action Area Plan must assess the impact of development on the Town Marsh and the potential for flooding in the area*".

All planning applications for development in the action area shall be accompanied by a Detailed Construction Management Plan, which includes all mitigation measures necessary to mitigate any impacts on the Arklow Town Marsh.

All planning applications for development in the action area shall be accompanied by a Design Report, which includes all mitigation measures necessary to mitigate any impacts on flooding in the area.

1.10 Disclaimer

The agreement to this Action Area by Wicklow County Council in its role as Planning Authority does not commit it to the provision of services.

The Planning Authority does not take responsibility for the accuracy of the documents submitted as part of this Action Area and listed under Appendix 1.

The Planning Authority reserves the right to agree modifications to the Action Area Plan, where appropriate, in the interest of proper planning and sustainable development.

MS 9/6/08 5

Kilbride AA1 May 2008

KILBRIDE ACTION AREA 1 APPROVAL DOCUMENT

APPENDIX 1

The following documents form part of the Kilbride Action Area Plan 1 as defined in the Arklow Environs Local Area Plan 2006.

- 1) Submission of the 07th February 2008 titled "Action Area Plan 1 for the lands at Kilbride, Arklow, Co. Wicklow"
- 2) Kilbride Action Area 1 Approval document, May 2008, Planning Department, Wicklow County Council

⁶
A9/b/08

KILBRIDE LANDS - AREA ACTION PLAN 3

SUBMISSION TO PRE-DRAFT CONSULTATION STAGE FOR THE ARKLOW & ENVIRONS LOCAL AREA PLAN

IDENTIFICATION TABLE	
Client/Project owner	Certain Assets of Dawnhill and Windhill Limited
Project	Kilbride lands - Area Action Plan 3
Title of Document	Submission to Pre-draft Consultation Stage for the Arklow & Environs Local Area Plan
Type of Document	Information Note
Date	02/04/2024
Reference number	IE01T24A28
Number of pages	18

TABLE OF CONTENTS

1.	INTRODUCTION	2
2.	SITE APPRAISAL	2
2.1	LOCATION	2
2.2	TRANSPORT INFRASTRUCTURE PROPOSALS	4
2.3	GREATER DUBLIN AREA CYCLE NETWORK PLAN (2022)	5
2.4	ARKLOW TO SHILLELAGH GREENWAY ROUTE	7
2.5	RECENT RELEVANT PLANNING ACTIVITY	8
3.	SITE ANALYSIS	12
3.1	CENSUS SAPS INFO – ARKLOW TOWN	12
4.	INTEGRATING LAND USE & TRANSPORT	13
4.1	MASTERPLAN APPROACH	13
4.2	CURRENT TRANSPORT POLICY	15
4.3	HISTORICAL AND FUTURE ROLE OF WESTERN DISTRIBUTOR ROUTE	16

1. INTRODUCTION

1.1.1 SYSTRA have been appointed by Certain Assets of Dawnhill and Windhill Limited to prepare a transport appraisal regarding lands at Kilbride, Arklow, Co. Wicklow, to inform a submission to the pre-draft consultation stage of the Arklow & Environs Local Area Plan update.

2. SITE APPRAISAL

2.1 Location

2.1.1 The Kilbride site is located on the northern side of the Avoca River in Arklow, Co. Wicklow, within the development boundary of Arklow Town in the townland of Kilbride. The lands measure approximately 76ha.

2.1.2 The site is part of the current Arklow and Environs Local Area Plan (LAP) 2018-2024 and is designated within the LAP as part of Action Area Plan 3 (AAP3), as shown below.



Map 11.3 Action Area 3 Kilbride

Figure 1. AAP 3 Lands – Arklow LAP

2.1.3 The subject site is zoned 'Mixed Use'. Maps 11.3 and 11.5 of the LAP illustrates the zoning for AAP3, identifying Kilbride as a location for major development in Arklow and as one of the most suitable lands in the environs of Arklow for large scale development. AAP3 is identified in the current LAP for the implementation of a maximum of 1,500 residential units, with accompanying community, local shops/services and open space areas and an objective to implement a school campus.

2.1.4 The current LAP zoning designation for the AAP3 lands is shown below, and a masterplan that has been developed for the full lands is shown thereafter, outlining the achievement of the zoning objectives for the site.



Map 11.5 Concept plan of AAP3, AAP4 and the lands in between zoned for development

Figure 2. Arklow LAP 2018-2024 – Zoning Designation for AAP3 & AAP4 lands at Kilbride

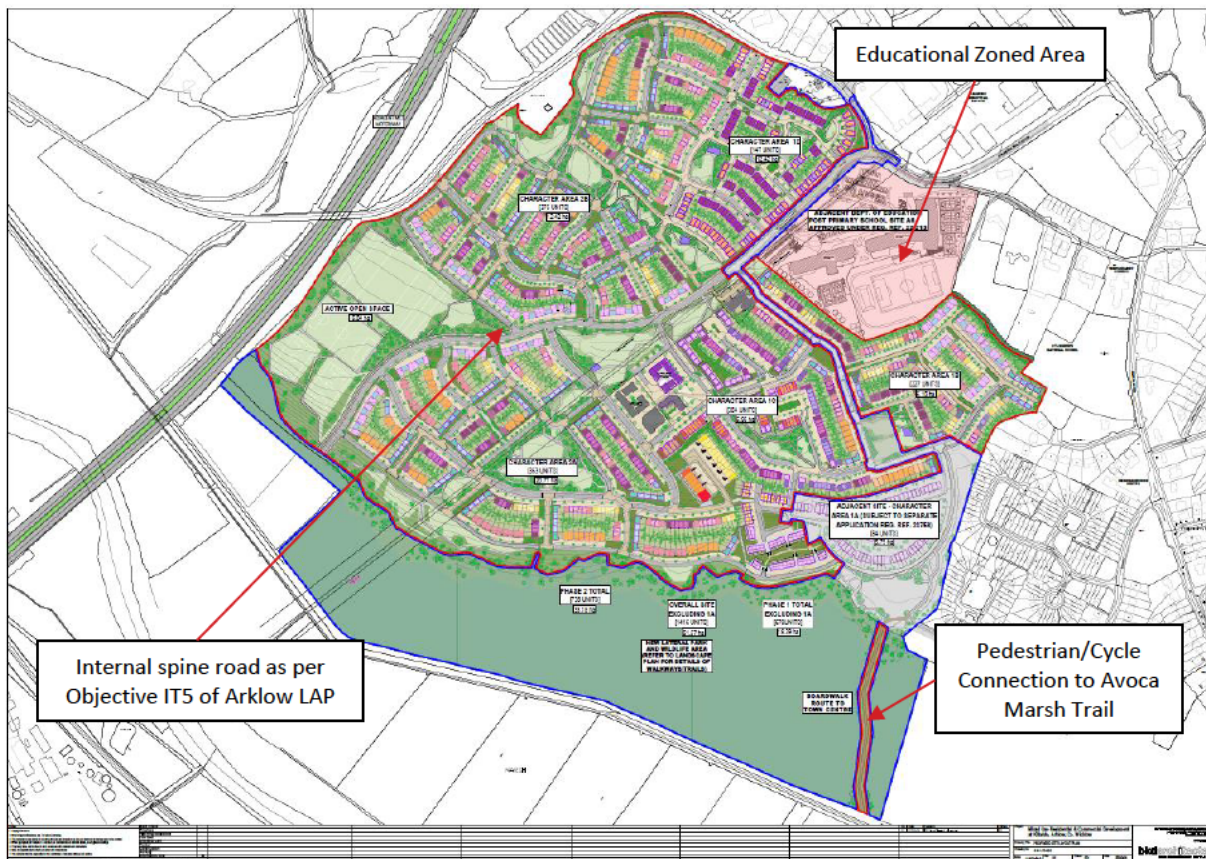


Figure 3. Masterplan for Kilbride Lands (Source: BKD Architects)



2.2 Transport Infrastructure Proposals

2.2.1 The Arklow LAP indicates that *‘Traffic flows on a number of the main routes within the town centre is constrained due to the restricted capacity of the junctions.’* Within the town there is a single crossing of the Avoca River to link the northern and southern sides of the town; otherwise, an alternative route is via the M11 using Junctions 20 and 21 which are located to the north and south of Arklow town, respectively.

2.2.2 Objective IT5 of the current LAP identifies a requirement for a ‘Western Distributor Route’ (WDR) to be constructed through the Kilbride lands, to incorporate a new river crossing and to link Kilbride to the Vale Road, Lambertson Avenue and the Coolgreaney Road. Objective IT6 supports the construction of a new interchange on the M11 at Lambertson, to be accessed via the new WDR.

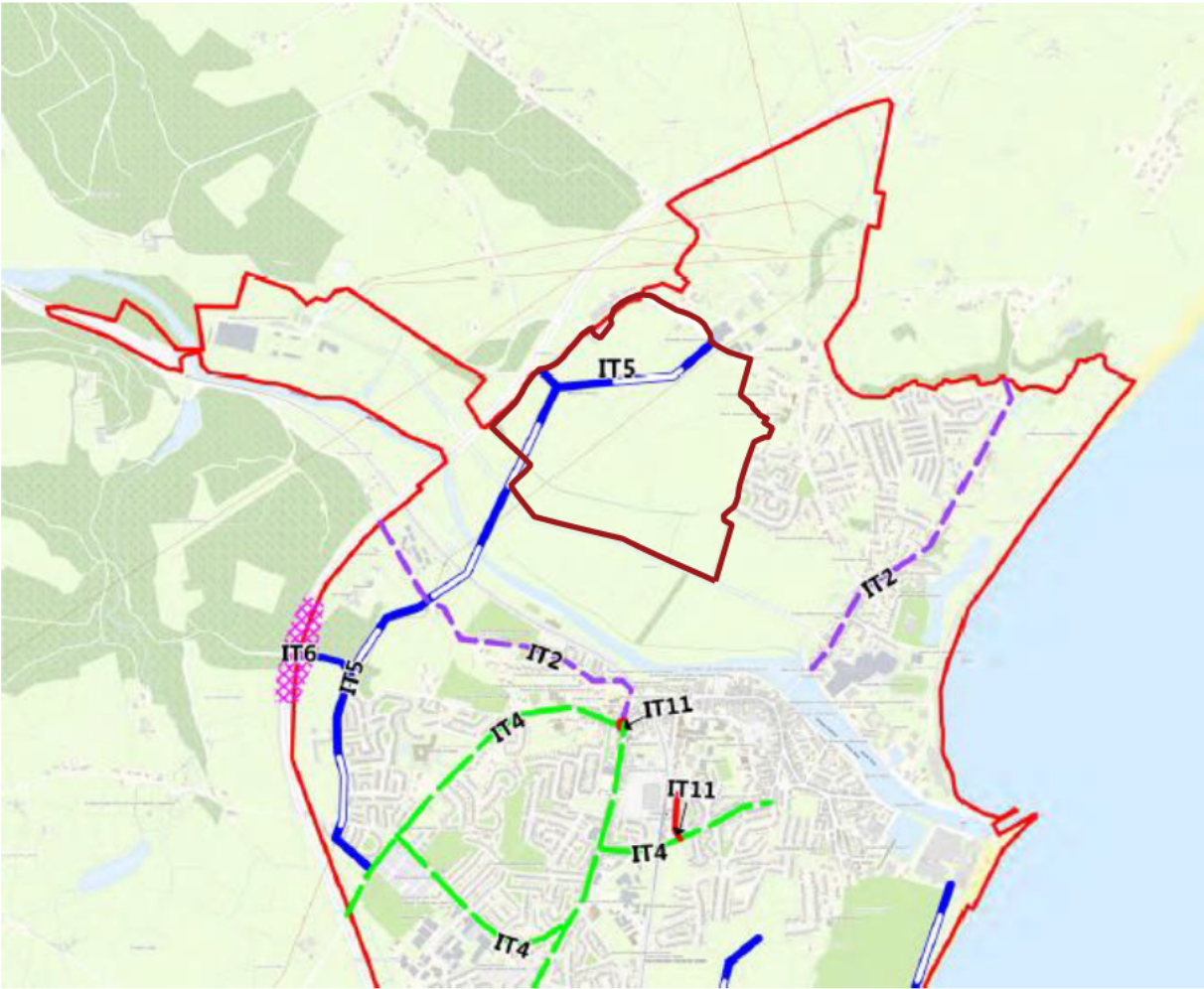


Figure 4. Transport Infrastructure Objectives IT5 & IT6 (Arklow LAP)

2.2.3 The provision of an additional interchange on the M11 at Lambertson is also identified as a National Road Objective in the Wicklow County Development Plan (2022-2028).



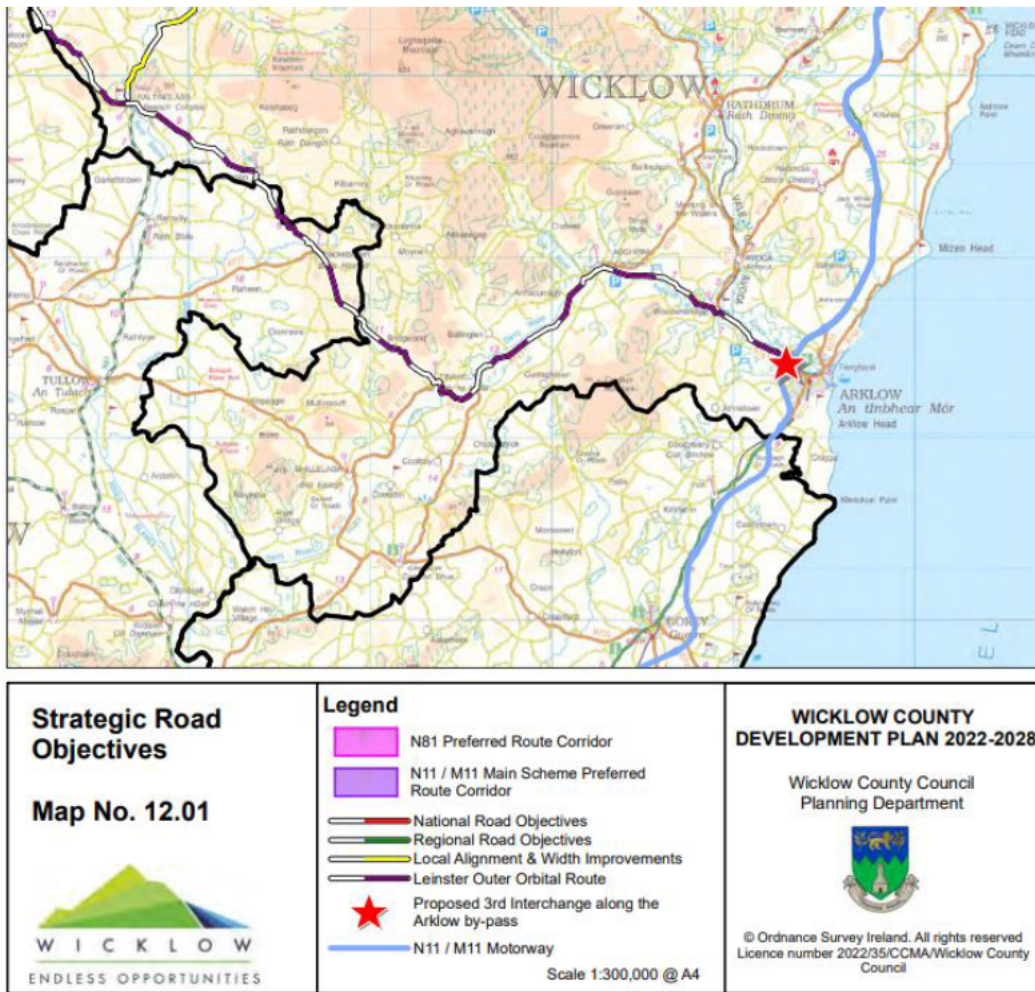


Figure 5. Wicklow County Development Plan (2022-2028) – Strategic Road Objectives

2.3 Greater Dublin Area Cycle Network Plan (2022)

2.3.1 The NTA Greater Dublin Area (GDA) Cycle Network Plan (2022) includes proposals for cycle facilities within Arklow town, as indicated below.

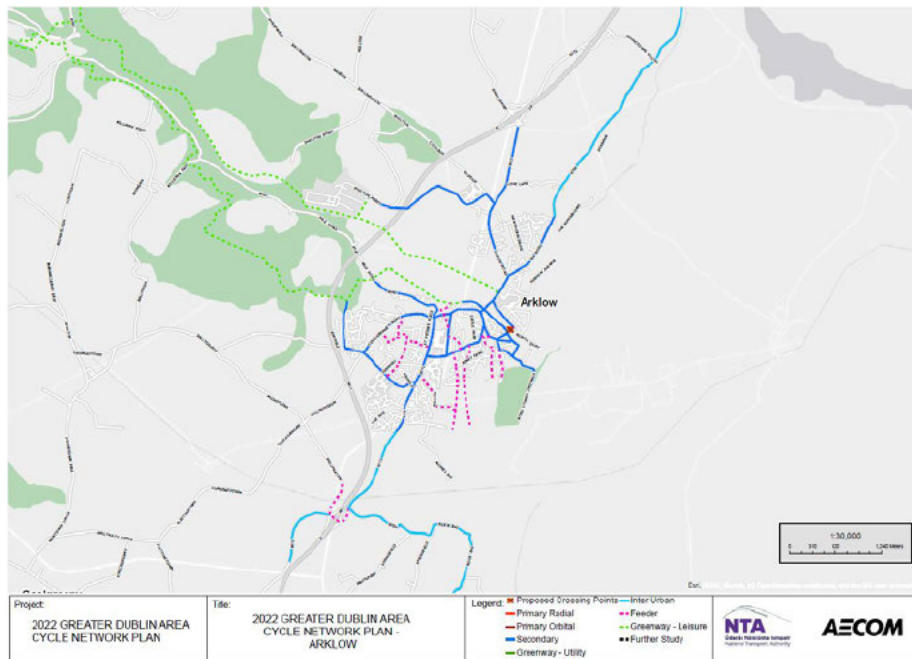


Figure 6. GDA Cycle Network Plan (2022) – Arklow

2.3.2 These proposals as they apply to the masterplan lands are illustrated in greater detail below.

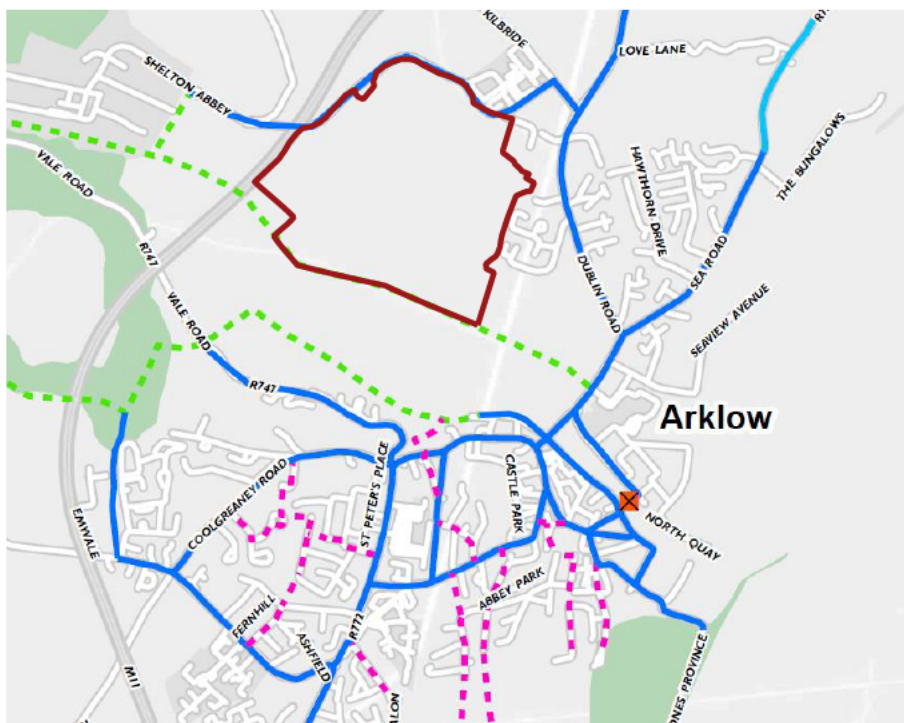


Figure 7. GDA Cycle Network Plan (2022) – Site Context (indicative site area shown in red)

2.3.3 It can be seen that the GDA cycle network plan includes for secondary cycle facilities (blue lines) on the Dublin Road and Sea Road to the east of the site, along the L6179 on the northern site boundary, and the implementation of a greenway (green dashed line) along the Avoca Marsh trail along the southern site boundary.



- 2.3.4 In the context of the above cycle network objectives for Arklow in the site vicinity, it is noted that the Dublin Road and Sea Road on approach to Arklow Town lie within the established built-up northern town area, with active frontage and numerous residential accesses present, hence their designation as secondary network links in the GDA Cycle Network Plan.
- 2.3.5 However, the proposed spine road in accordance with Strategic Objective IT5 being implemented through the Kilbride lands as part of recent planning activity (see Section 2.5 below) includes for the provision of dedicated cycle facilities on both sides of the new road infrastructure being implemented, as well as a new pedestrian and cycle connection through to the Avoca Marsh trail to allow for a connection to the Ferrybank Road. This provides an opportunity to implement high-quality pedestrian and cycle connectivity into the design of this access through the lands from the outset.
- 2.3.6 This will in turn complement the potential future additional river crossing that forms part of the Western Distributor Route (Objective IT5) and will ultimately offer high-quality segregated cycle facilities to link to the future river crossing and the southern town and waterfront.

2.4 Arklow to Shillelagh greenway route

- 2.4.1 The Arklow to Shillelagh Greenway is proposed to route along the southern side of the Avoca River, along the waterfront. The emerging preferred route of the Greenway in the context of the site is shown below. This is expected to progress to detailed design in 2024.



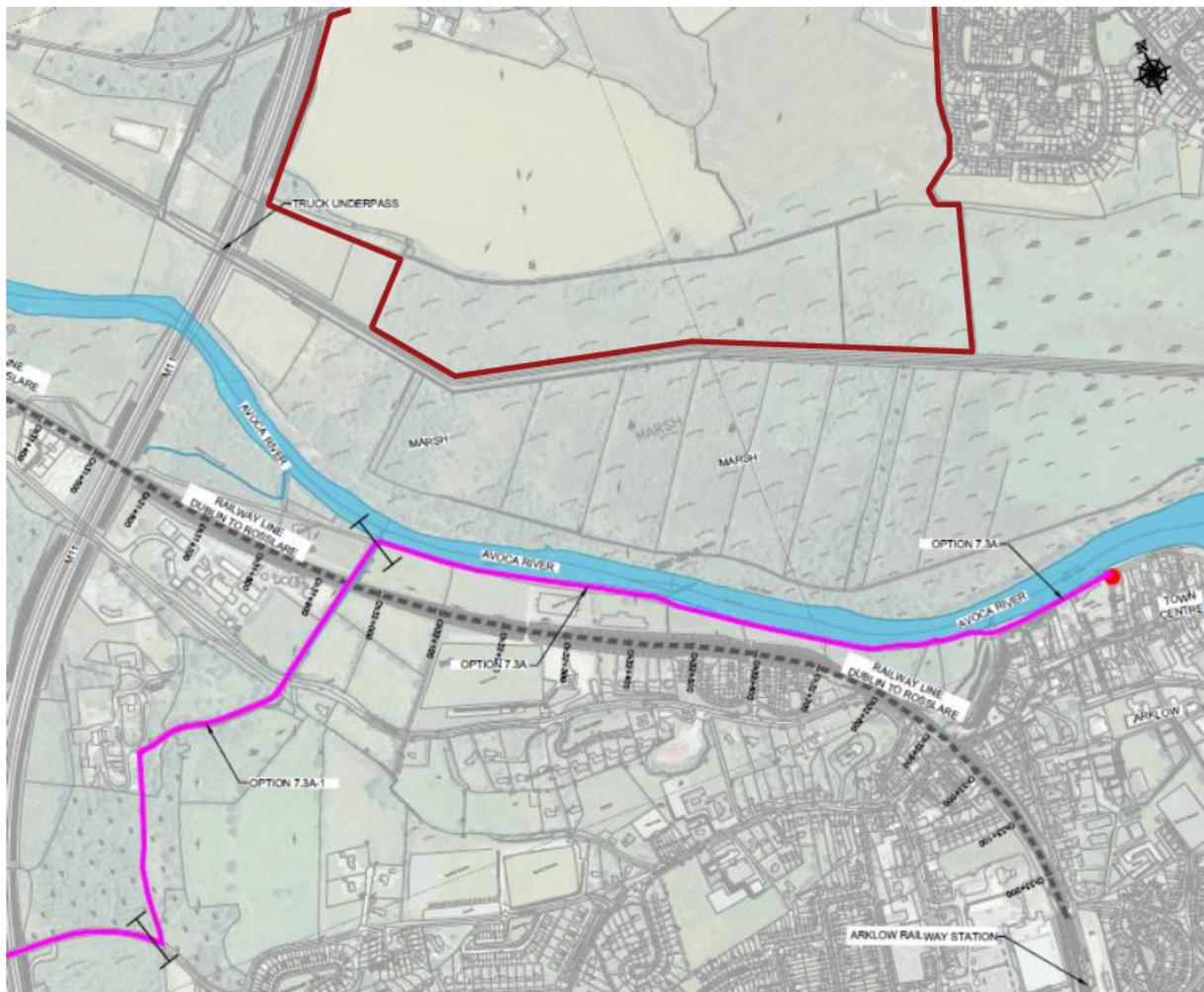


Figure 8. Arklow to Shillelagh Greenway – Emerging Preferred Route (site boundary shown in red)

2.5 Recent Relevant Planning Activity

- 2.5.1 The Kildare & Wicklow Education & Training Board (KWETB) have recently received a grant of planning permission (Ref. 22/213) for a new school campus in accordance with the objectives of AAP3 in the Arklow LAP, within the masterplan lands. This proposal includes for the construction of a new access road from the existing Avoca River Park Access Road, which is intended to form part of the future IT5 Western Distributor Route alignment, itself one of the objectives of the current Arklow Local Area Plan.

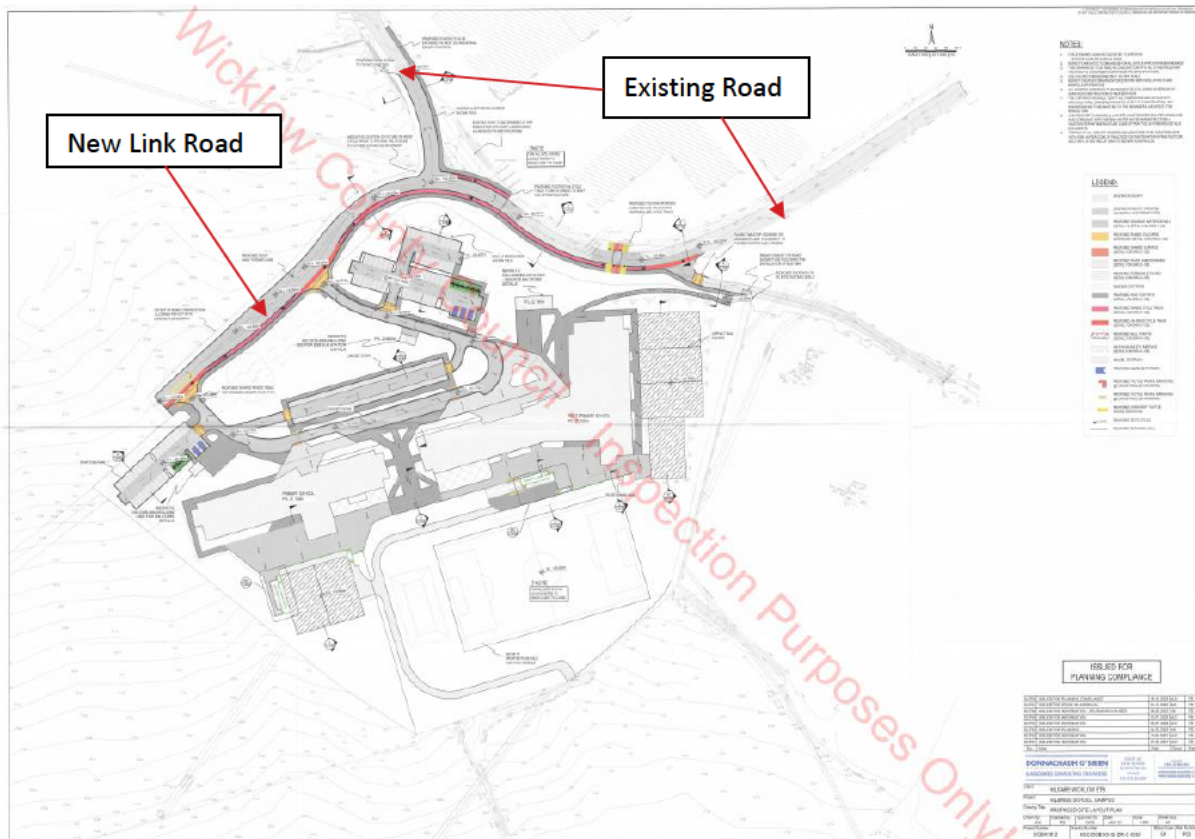


Figure 9. Proposed School Campus Development and new road on IT5 indicative alignment (Source: Wicklow County Council)

2.5.2 A planning application has been submitted by Certain Assets of Dawnhill and Windhill Limited to Wicklow County Council (WCC) as of October 2023 for 86 no. residential units within the overall masterplan lands as part of an initial phase of development (Ref. 23/745). The site is located to the south of the educational campus site and is an initial phase of residential development within the overall masterplan lands. This application is currently at Further Information stage and a decision is expected in April of 2024. This application has been developed to complement the adjacent educational campus indicated in Figure 1 above with both sites sharing the internal spine road, and will include a further extension of this spine road in a south-westerly direction (as identified as Objective IT5 in the Arklow LAP).





Figure 10. Proposed 86-unit application – site context

2.5.3 The proposed development will also include for a temporary pedestrian and cyclist connection through to the R772, Dublin Road via Avondale Crescent, which will subsequently be upgraded to route along the existing Arklow Marsh walkway, and segregated cycle facilities on the internal road network, as indicated below.



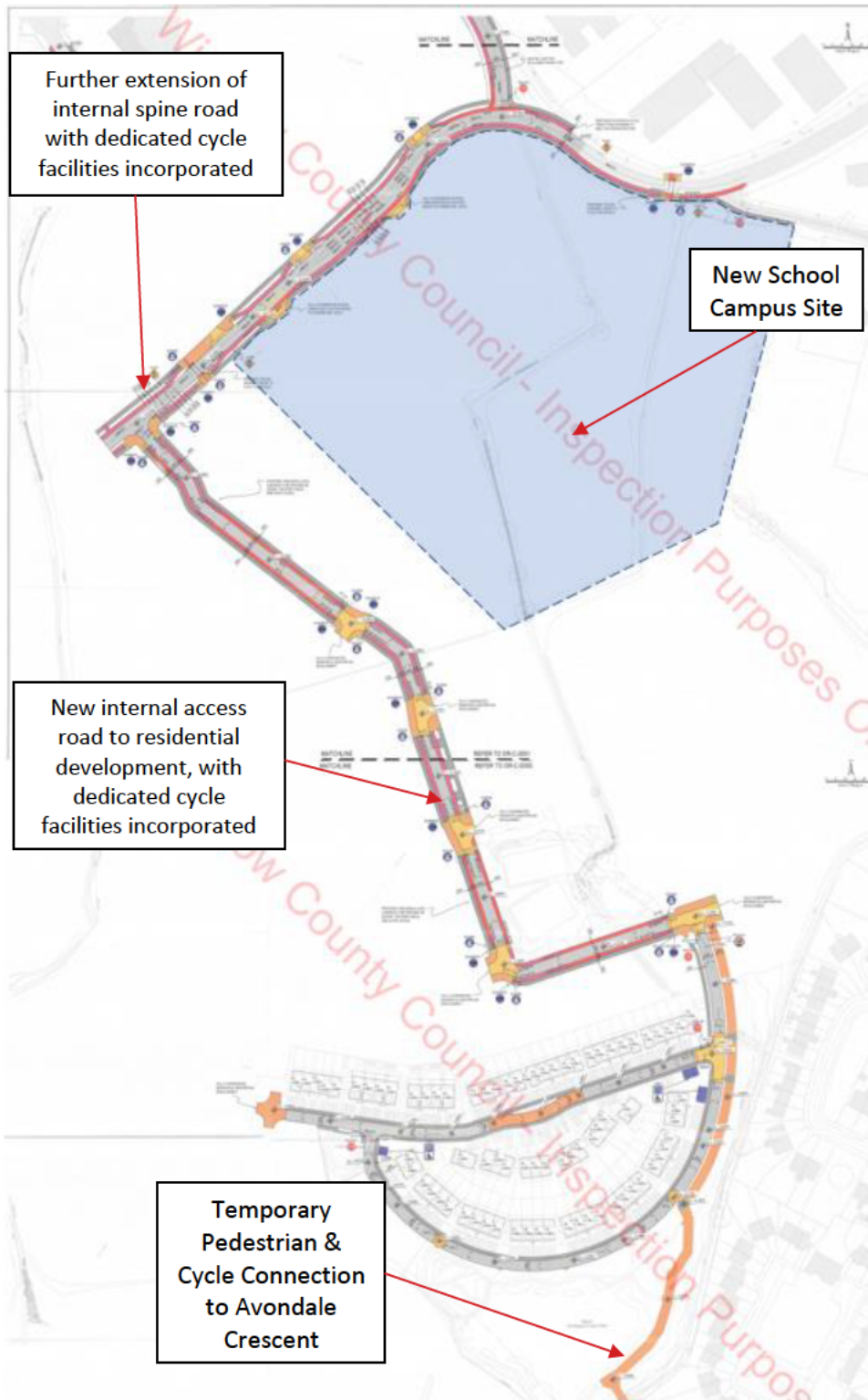


Figure 11. Proposed Phase 1 residential development



3. SITE ANALYSIS

3.1 Census SAPS info – Arklow Town

3.1.1 The CSO provides commuting profile data from Census 2022 as part of the Small Area Population Statistics (SAPS) dataset, which includes information regarding mode share, journey time to work, etc. for the entire country. Arklow is recorded as having a population of 13,399 people as per the 2022 Census.

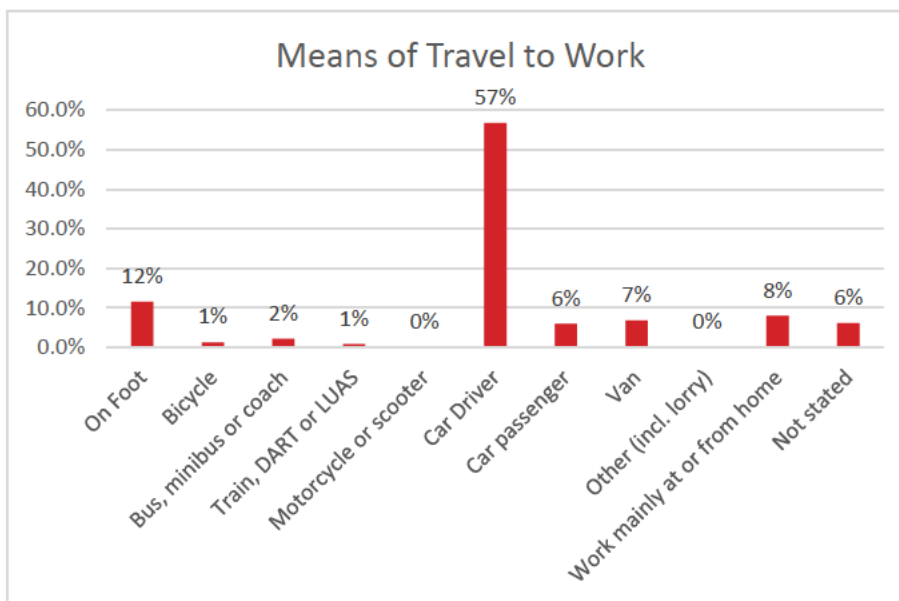


Figure 12. Mode Share – Journey to Work (Census 2022)

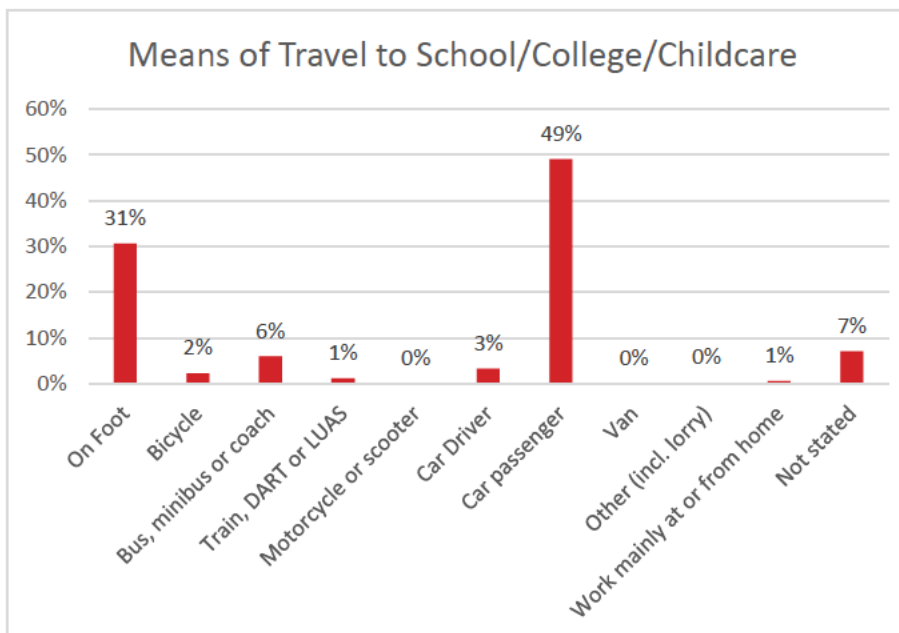


Figure 13. Mode Share – Journey to School/College/Childcare (Census 2022)

3.1.2 The above figures illustrate that approximately 39% of journeys to education or childcare are made on foot, by bicycle or by bus, with approximately 15% of journeys to work by the same means.

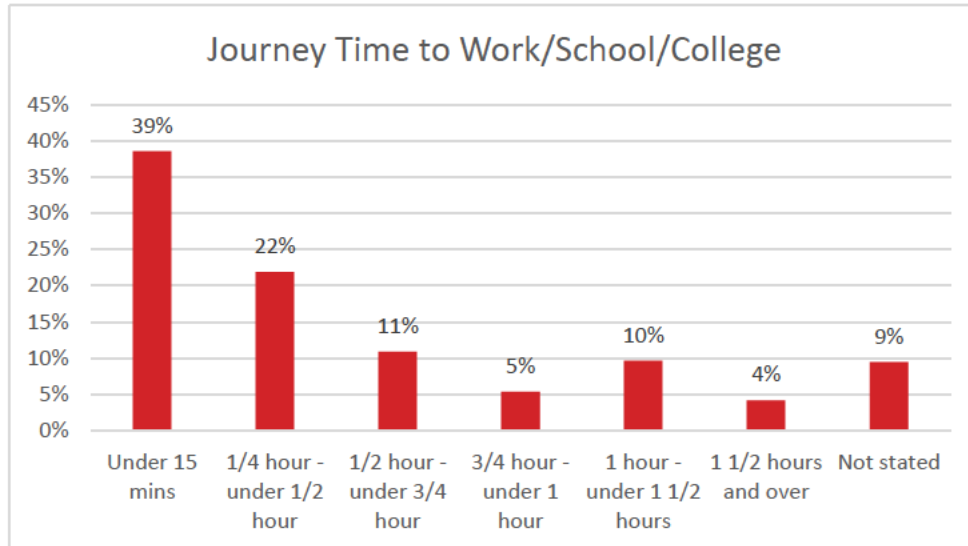


Figure 14. Journey time to work/school/college (Census 2022)

3.1.3 The indicated journey times, with approximately 39% being below 15 minutes, indicates that there is strong potential to effect a mode shift towards walking and cycling through the provision of high-quality infrastructure, providing complementary land uses in zoned lands to encourage short distance local trips and by ensuring permeability and connectivity is provided throughout developments to ensure that walking and cycling remain more attractive travel choices.

4. INTEGRATING LAND USE & TRANSPORT

4.1 Masterplan Approach

4.1.1 The intended land-use zoning for the lands as per the current Arklow LAP comprises mixed residential, community and open space uses. This includes for the provision of a school campus, local shops and services and active sports and children’s play areas.

4.1.2 The masterplan as prepared for the Kilbride lands includes for the implementation of a wide range of community facilities across the various phases. The first phase, to comprise an initial 762 units, will be implemented in conjunction with local shops, a crèche and other services. Phase 2a will comprise an additional 363 residential units, an active sports area and additional parks, playgrounds and open spaces. The masterplan approach will provide initial access from the L6179 and the continued implementation of phased internal road infrastructure that will in turn facilitate a potential future Avoca River crossing outlined within Objective IT5 of the Arklow LAP, with the central spine road extended in each phase/sub-phase of development within the overall lands, ultimately reaching as far as the extent of the masterplan lands along the southern site boundary.

- 4.1.3 The adjacent permitted educational campus will provide wider community benefit to both the AAP3 lands and also to existing residential areas along the Dublin Road and Sea Road, in particular benefitting second-level students as there are no such educational facilities to the north of the Avoca River, and second-level school trips are more readily made by walking, cycling and public transport when compared to primary school trips.
- 4.1.4 The consolidation of complementary land uses, and the planned pedestrian/cycle connectivity to the Avoca Marsh trail to the south east of the site, will be of benefit not just to the AAP3 lands, but to the wider built up area to the north of the Avoca River, offering locally-based facilities/amenities and services that are within sufficiently short distances so as to encourage walking and cycling trips. In tandem with this, the pedestrian and cycle connectivity proposed in the initial phases will ensure that local shops and services are easily reached by these active modes.
- 4.1.5 The figures below indicate walking and cycling catchments from the proposed pedestrian and cyclists connection to the R772 Ferrybank Road.

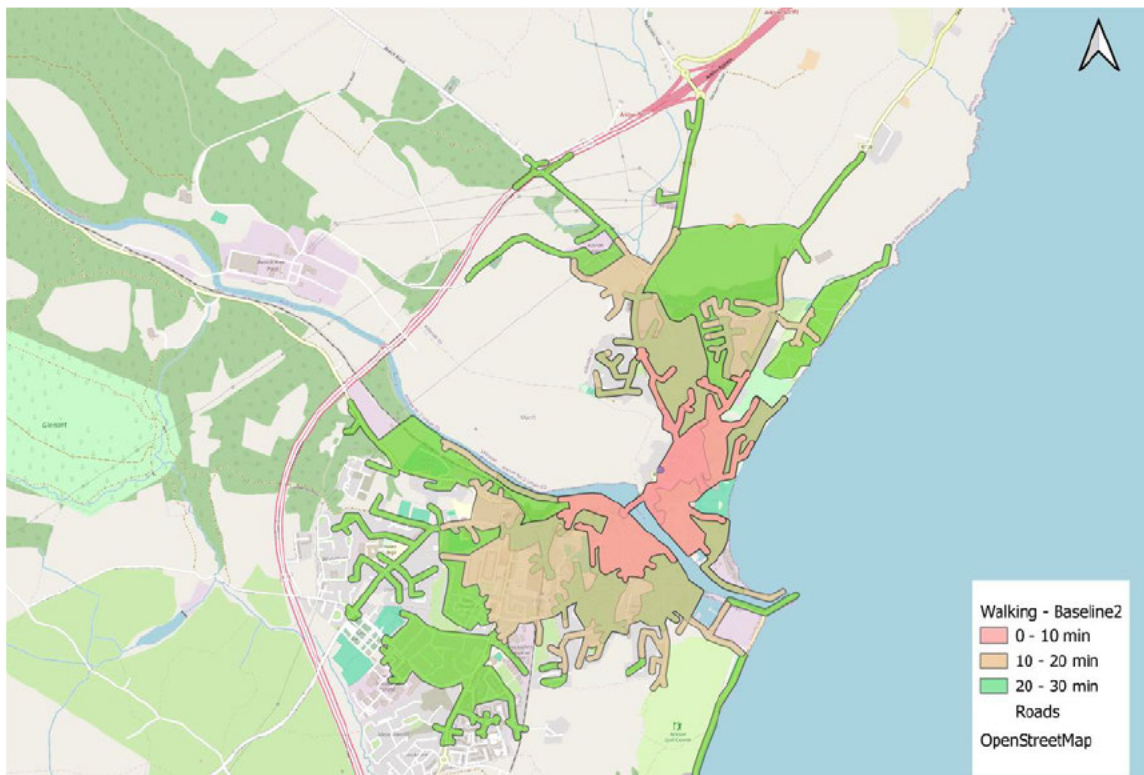


Figure 15. Walking catchment from Avoca Marsh entrance to Ferrybank Road

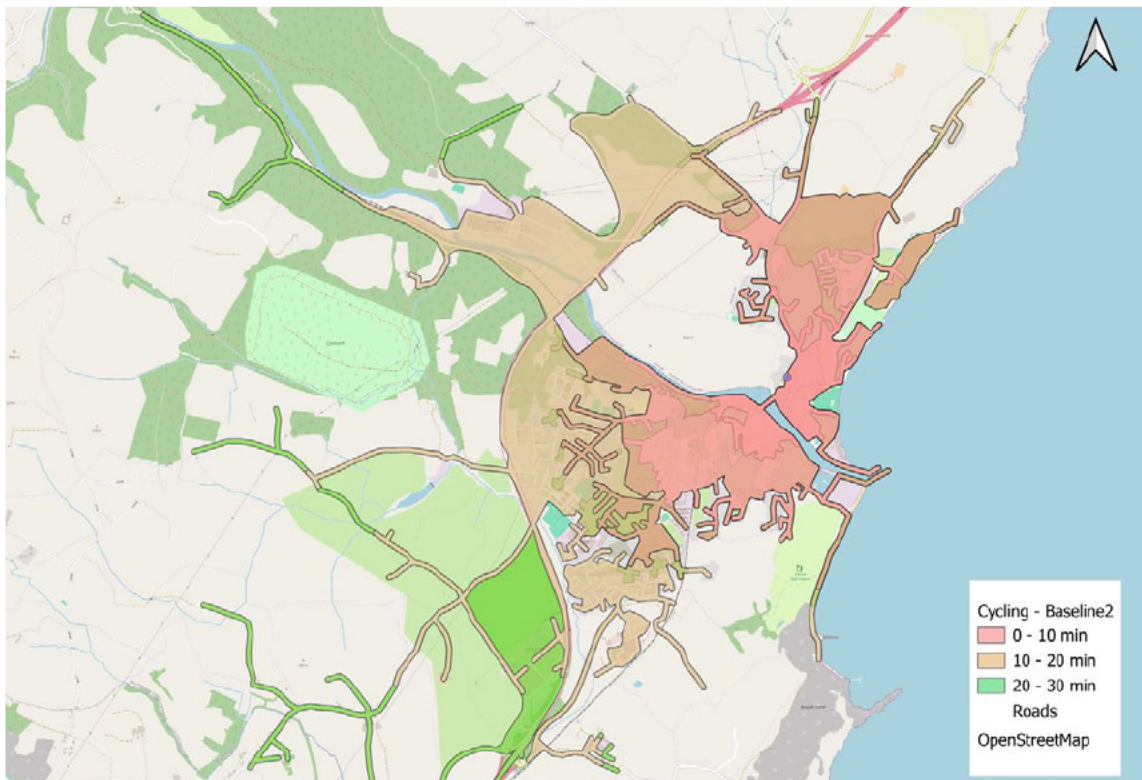


Figure 16. Cycling catchment from Avoca Marsh entrance to Ferrybank Road

4.1.6 The catchments are based on 10, 20 and 30-minute travel times, respectively. The above figures illustrate that the proposed new pedestrian and cycle connectivity through the Avoca Marsh included in the recent planning application for residential development within the masterplan lands significantly increases the catchment area that can be reached by walking and cycling, encompassing the vast majority of Arklow town centre, the Bridgewater Shopping Centre, the railway station and the north and south quay areas all easily reached on foot and by bicycle. This demonstrates the value of including these connections within the scheme design and the proposed dedicated cycle facilities within the Kilbride lands road network will further increase the attractiveness of walking and cycling for trips into the town centre that can be readily made in a short time as opposed to by private car.

4.2 Current Transport Policy

4.2.1 Both the National Investment Framework for Transport in Ireland (NIFTI) and the Climate Action Plan (CAP) set out sustainably-led principles for transport investment in Ireland.

4.2.2 NIFTI advocates an approach based on the prioritisation of active and sustainable modes in tandem with optimising the efficiency of the transport network, thereby reducing the need for new infrastructure where not appropriate.

4.2.3 The CAP is based on the 'Avoid/Shift/Improve' approach –

- Avoid – integrating land-use and transport within developed communities, which reduces the need to travel longer distances by non-sustainable modes;

- Shift – prioritisation of active travel and public transport use, and design features such as enhanced pedestrian and cycle facilities and increased permeability support these modes; and
- Improve – Low-carbon, more efficient vehicle use, EV parking, etc.

4.2.4 The masterplan-led development of the Kilbride lands as proposed ensures that land-use and transport are integrated across all phases, with extensive, high-quality pedestrian and cyclist facilities and connections throughout.

4.3 Historical and Future Role of Western Distributor Route

4.3.1 The Western Distributor Route, outlined as Objective IT5 within the current Arklow LAP is intended to provide additional connectivity through the AAP3 lands for subsequent development, to facilitate an additional river crossing and to provide onward connectivity to the Vale Road, Lamberton Avenue and the Coolgreaney Road to the south. The WDR is also intended to alleviate traffic congestion on the existing Nineteen Arches Bridge, which is the single river crossing within Arklow town and represents a constraint on cross-river movement, with the use of the M11 the only alternative option for connectivity between the north and south of the town. The WDR also allows for a future additional interchange on the M11 as identified as Objective IT6 in the current LAP and as a Strategic Roads Objective in the Wicklow County Development Plan (2022-2028).

4.3.2 The WDR fulfils a wide range of local and strategic requirements –

- It forms part of initial access to the Educational Campus and the Kilbride lands, from the L6179 to the north;
- It will connect to a potential new bridge crossing of the Avoca River when implemented, and onwards to connect to existing roads to the south-west of Arklow Town;
- It will provide additional resilience and capacity on the transport network (for all modes) within Arklow and support opportunities to reallocate road space within the town centre core; and
- It will be suitable to accommodate local bus services within Arklow Town, which are currently under consideration.

4.3.3 As the Arklow LAP update process commences, the Western Distributor Route will remain key in terms of fulfilling a number of roles, as outlined above. The delivery/funding mechanism and planning route for an additional Avoca River crossing is yet to be determined. In the short-term, the local objective to develop the Kilbride lands can be fulfilled, providing access from the L6179 with the phased implementation of the northern portion of Western Distributor Route as far as the southern site boundary with the Avoca Marsh. Ensuring high-quality pedestrian and cycle connects from the southern site extents through to the Nineteen Arches Bridge close to Arklow Town Centre, and consolidation of complementary mixed uses within the Kilbride lands will ensure that short-distance trips are conducive to walking and cycling as the mode of choice.

4.3.4 In the longer-term, the additional Avoca River crossing can complement the WDR and fulfil a wider range of strategic objectives for the wider Arklow area, improving regional connectivity, providing additional resilience and improving permeability and connectivity.



- 4.3.5 As outlined above, recent planning applications within the AAP3 lands will see the phased implementation of a portion of the WDR, along a centrally-based alignment which maximises the potential catchment of walking and cycling modes and any potential future local bus services that may utilise the route.



APPROVAL

Version	Name		Position	Date	Modifications
1	Author	Clifford Killeen	Associate Director	26/03/2024	First draft
	Checked by	Clifford Killeen	Associate Director	26/03/2024	
	Approved by	Andrew Archer	Director	26/03/2024	
2	Author	Clifford Killeen	Associate Director	28/03/2024	Final Draft
	Checked by	Clifford Killeen	Associate Director	28/03/2024	
	Approved by	Andrew Archer	Director	28/03/2024	
3	Author	Clifford Killeen	Associate Director	02/04/2024	Final
	Checked by	Clifford Killeen	Associate Director	02/04/2024	
	Approved by	Andrew Archer	Director	02/04/2024	

