

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

Who are you:	Agent
Name:	Tom & Pat Redmond
Reference:	ARKLPF-164216
Submission Made	November 11, 2025 5:22 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.2 County Development Plan Strategy for Arklow
- A.3 Factors Influencing Future Development Options
- A.4 Overall Strategy

Local Planning Framework PART B Settlement Specific Objectives.

- B.3 Housing Development
- B.8 Physical Infrastructure
- B.9 Zoning & Land Use
- B.10 Specific Local Objectives

Maps:

- Land Use Map
- Roads & Transportation Strategy Maps

Appendices:

- Draft Local Transport Plan
- Infrastructure Assessment, Phasing and Implementation

Upload a File (optional)

BMC - Arklow LAP Submission - Variation No. 5.pdf, 3.32MB

Draft Arklow Local Planning Framework Local

DRAFT
ARKLOW
LOCAL PLANNING FRAMEWORK
2025



Submission

On behalf of

Tom & Pat Redmond

November 2025



63 York Road,
Dun Laoghaire
Co. Dublin
www.brockmcclure.ie



Table of Contents

1	EXECUTIVE SUMMARY	3
2	INTRODUCTION	5
2.1	CLIENT’S BACKGROUND.....	5
2.2	CLIENT’S LANDHOLDING	5
3	STATUTORY PLANNING CONTEXT	7
3.1	NATIONAL PLANNING FRAMEWORK – PROJECT IRELAND 2040	7
3.2	NPF IMPLEMENTATION: HOUSING GROWTH REQUIREMENTS, GUIDELINES FOR PLANNING AUTHORITIES 2025	8
3.3	REGIONAL SPATIAL AND ECONOMIC STRATEGY FOR EASTERN AND MIDLAND REGIONAL ASSEMBLY (RSES)	9
3.4	WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028	10
3.5	ARKLOW AND ENVIRONS LOCAL AREA PLAN 2018-2024	11
4	SUBMISSION – KEY ISSUES TO BE ADDRESSED	14
4.1	POPULATION AND HOUSING	14
4.2	RESIDENTIAL ZONING.....	16
4.3	KEY FINDINGS	19
4.4	SOUTHERN PORT ACCESS ROAD.....	20
4.5	LOCAL TRANSPORT PLAN OBJECTIVES	22
4.6	OVERVIEW OF SLO4 – TINAHASK UPPER – MONEY LITTLE AND MONEY BIG	24
5	REZONING REQUEST	27
5.1	SITE HISTORY	27
5.2	STRATEGICALLY LOCATED LANDS.....	28
5.3	ACCESSIBLE, SERVICED, READILY AVAILABLE LANDS	28
6	REQUESTED AMENDMENTS TO SLO4 – TINAHASK UPPER – MONEY LITTLE & MONEY BIG	30
7	CONCLUSION	33





1 Executive Summary

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin have been instructed by our client, **Tom & Pat Redmond, Unit 4B Ballyloughan Business Park, Arklow Road, Gorey, Co. Wexford**, to make this submission in response to the notification by Wicklow County Council of publication of the Draft Arklow Local Planning Framework 2025.

We note the relevant submission date is **12 November 2025** in this case and this Submission is lodged within that timeframe.

On 1st October 2025, Wicklow County Council (WCC) published the Draft Arklow Local Planning Framework (LPF) 2025. Our client welcomes the opportunity to provide a submission and to engage on the future direction of the Town and we trust our input will be considered during the formulation of the final Plan and future development of Arklow.

This submission has been prepared to assist WCC in aligning the Draft LPF with the strategic housing, infrastructure and growth objectives of the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Eastern & Midland Region, which identify Arklow as a key regional growth town.

Our clients' lands at Tinahask Upper, Money Little and Money Big (SLO4) represent a strategic, fully serviced, and immediately developable landbank that is critical to the delivery of:

1. The Southern Port Access Road (SPAR) – a key piece of strategic transport infrastructure necessary to unlock the southern expansion of Arklow and alleviate traffic congestion in the town core;
2. The next phase of residential development to meet the housing delivery targets for Arklow; and
3. The creation of a balanced and sustainable community supported by active open space, educational, and local retail facilities in accordance with proper planning and sustainable development principles.

This submission formally requests that the Planning Authority:

- **Review and update the housing yield allocations for Arklow to ensure they are evidence-based and aligned with the latest NPF, RSES, and ESRI growth projections;**
- **Zone sufficient lands within the LPF to meet Arklow's identified housing and infrastructure delivery needs; and**
- **Rezone the southern portion of the subject lands at Tinahask Upper from 'RN2 – New Residential Priority 2' to 'RN1 – New Residential Priority 1' to enable timely delivery of housing and the SPAR within the lifetime of the LPF.**

The rezoning of the SLO4 lands is not a speculative request but a strategic necessity. These lands represent the only logical and technically feasible location to deliver the SPAR corridor, which is recognised as critical enabling infrastructure for Arklow's long-term development and for unlocking sustainable southward expansion of the town.

Without the SPAR, future development to the south will remain constrained, and existing congestion on the Wexford Road and through the town centre will continue to worsen. The completion of the SPAR through the SLO4 lands will therefore facilitate both residential growth and essential traffic relief, delivering direct and measurable public benefits.

Furthermore, the subject lands are fully serviced, with capacity available for immediate connection to water, wastewater, and electricity infrastructure, and are located contiguous to the built-up area. They are already integrated within the approved Action Area Plan 2 (AAP2) and the permitted Phase 1 Large-



Scale Residential Development (LRD) on the northern portion of the site (Reg. Ref. 24/325), confirming the site's suitability, deliverability, and alignment with the Council's established development framework.

Rezoning the lands to RN1 will ensure continuity between the existing and future phases, prevent piecemeal development, and maintain consistency with the agreed AAP2 phasing principles and approved planning conditions. This will also enable the early delivery of key community infrastructure, including active open space, school lands, and local services, all within a coherent, infrastructure-led framework.

For the reasons set out above, our clients respectfully request that the Council amend the Draft LPF zoning map as follows:

To illustrate the subject lands at Tinahask Upper (SLO4) rezoned from zoning objective RN2 – New Residential Priority 2 to zoning objective RN1 – New Residential Priority 1.

Reason: In the interests of proper planning and sustainable development, to facilitate the delivery of the Southern Port Access Road, provide for immediate residential development, and enable the achievement of Arklow's housing growth targets in a coordinated, infrastructure-led manner consistent with the NPF, RSES, and the approved AAP2 framework.

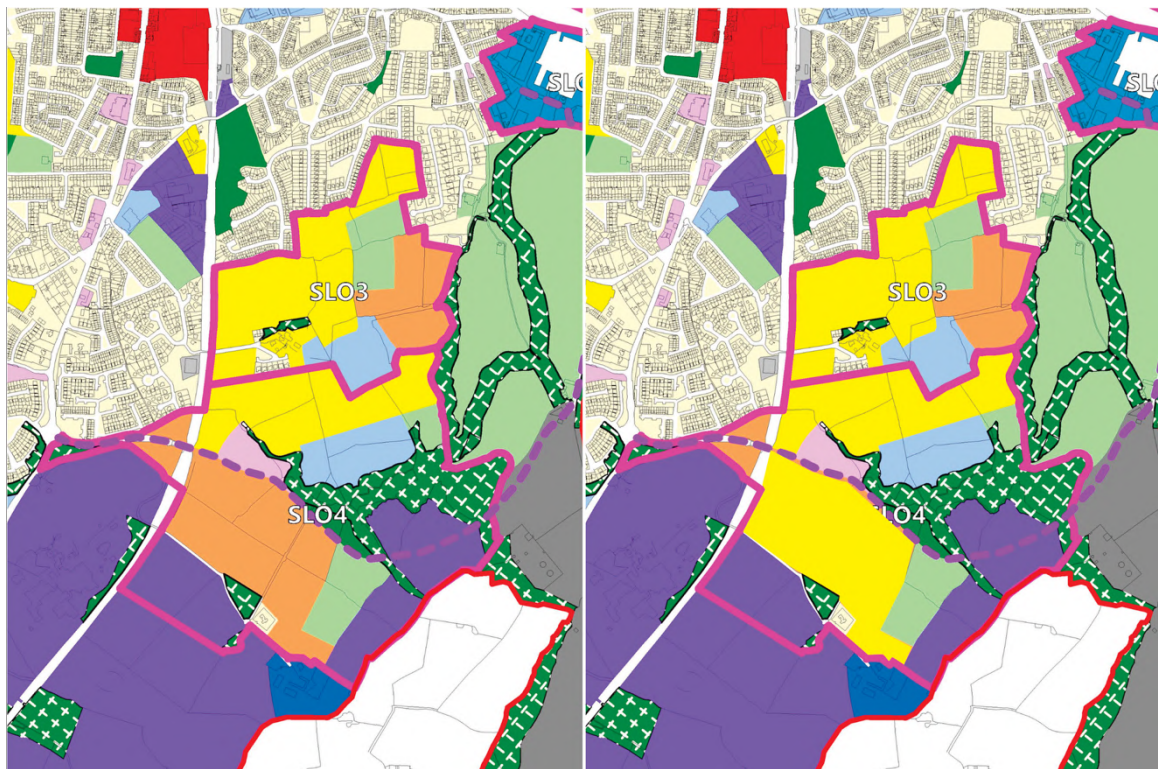


Figure 1 - Draft LPF Zoning vs Requested Zoning as part of this Submission

2 Introduction

Our client welcomes the opportunity to provide a submission on the Draft Arklow Local Planning Framework 2025, and we trust that our input will be considered prior to the adoption of the final LPF.

2.1 Client's Background

Tom & Pat Redmond have been at the forefront of land planning and development for over 30 years. They have a proven track record of delivering projects on time and to the highest standards in key locations specialising in residential schemes including Local Authority housing projects and commercial builds. In this time of a national housing crisis and new targets for housing delivery, it is imperative that the developments proposed by our clients are supported through planning policy so that new units can be delivered.

They are hugely active in County Wicklow and neighbouring County Wexford, with housing schemes such as Meadow Gate, Wicklow (95 units), Oak Springs, Wicklow (45 units), Millquarter, Gorey (159 units) completed and 97 units underway along with 29 no. units at Bracken Demense, Roundwood also underway. Several schemes are also progressing to pre-planning or planning stage with the Council.

Our clients have received planning permission for a Large-Scale Residential Development (LRD) application for the northern portion of the subject lands under Reg. Ref. 24/325. Permission was granted on 21 January 2025 for a 7-year permission for the construction of 476 no. residential units (in the form of houses, apartments and duplexes), communal and public open spaces (both active and passive spaces incl. 13 no. local parks), a mixed-use neighbourhood centre building consisting of 2 no. retail units, a community centre and office space and a 2 storey childcare facility along with the provision of access to lands reserved for a secondary school and the partial construction of the Port Access Road and all associated works.



Figure 2 - Permitted Site Layout Plan Ref. 24/325 for the northern portion of lands

2.2 Client's Landholding

This submission, in respect of the Draft Arklow LPF is made in so far as it relates to our client's land parcel at Tinahask Upper, Money Little and Money Big, Arklow, Co. Wicklow.

Tinahask Upper

The lands are generally located to the south of Arklow town, Co. Wicklow at Tinahask Upper, Money Little and Money Big, Arklow on an overall site area of approximately 38.58 ha. The lands are bound to

the north by the existing AAP1 lands, to the east by the golf club and quarry site, to the south by open farmlands and to the west by a railway line. Access to the lands is currently provided by an access road and railway bridge from the Knockmore roundabout on Northwood Road.



Figure 3 – Ownership Map with Tinahask Upper site outline in Red

The subject lands also form part of the Action Area Plan 2, approved by Wicklow County Council on 11th July 2023.



Figure 4 – AAP1 and AAP2 lands outlined with our client's ownership denoted in Red



3 Statutory Planning Context

3.1 National Planning Framework – Project Ireland 2040

The National Planning Framework (NPF) is the Government's high-level strategic plan for shaping the future growth and development of our country out to the year 2040.

The NPF sets out that the Eastern and Midland part of Ireland will, by 2040, be a Region of around 3 million people, at least 470,000 additional people between 2022 and 2040 / approx. 690,000 additional people over 2016-2040 (NPO 3).

The NPF acknowledges that the strategic location of County Wicklow, proximate to the Capital, has in part, resulted in a significant development in a region characterised by the dominance of Dublin. The Mid-East has experienced high levels of population growth in recent decades, at more than twice the national growth rate. Census data indicated that this pattern is continuing with population growth in the Mid-East exceeding the national average rates in the 2016 – 2022 period.

Section 2.6 of the NPF states the following in relating to compact and sustainable growth:

“An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference.”

The following National Policy Objectives are of relevance:

- NPO 7 –** *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.”*
- NPO 11 –** *“Planned growth at a settlement level shall be determined at development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.”*
- NPO 14 –** *“Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.”*
- NPO 20 –** *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”*
- NPO 24 –** *“Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid overdevelopment, while sustaining vibrant rural communities.”*
- NPO 27 –** *“Continue to support programmes for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Uisce Éireann and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.”*
- NPO 43 –** *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*
- NPO 101 –** *“Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.”*





NPO 102 – *“When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.”*

To conclude this section, it is respectfully requested that Wicklow County Council have due regard to the above National Planning Framework objectives in the context of both Arklow’s strategic role within the region and the subject lands at Tinahask Upper, Money Little and Money Big. The NPF sets a clear direction for compact, sequential, and sustainable urban growth, focusing on the regeneration of existing settlements, the efficient use of serviced lands, and the timely delivery of critical infrastructure.

In this regard, the subject lands represent a prime opportunity to directly advance these national policy priorities. The lands are:

- ▶ strategically located,
- ▶ fully serviced,
- ▶ capable of supporting compact urban expansion within the existing footprint of Arklow, in line with NPO 7 and NPO 43.

The delivery of the Southern Port Access Route through these lands would not only alleviate congestion and enhance accessibility but would also facilitate balanced development and economic growth in accordance with NPO 11, NPO 14, and NPO 20.

Accordingly, the integration of these lands within a Priority 1 residential zoning framework would enable the town to meet its housing growth targets in a sustainable manner, consistent with the principles of the NPF. Such an approach would ensure that development in Arklow is both plan-led and infrastructure-driven, reinforcing its function as a vibrant, well-connected, and resilient settlement that contributes meaningfully to the regional and national growth agenda set out under Project Ireland 2040.

3.2 **NPF Implementation: Housing Growth Requirements, Guidelines for Planning Authorities 2025**

The Department of Housing, Local Government and Heritage published these Guidelines in July 2025 with an immediate Government’s call to action for local authorities to identify suitable lands for rezoning for residential use. These Guidelines mark a significant shift in national housing policy implementation, translating the revised National Planning Framework targets into actionable obligations for local authorities. Specifically, the Minister has directed each Planning Authority to review their Development Plans to ensure consistency with new national housing targets set by the NPF First Revision.

At the county level, Wicklow County Council is now required to review the Wicklow County Development Plan against new annual housing targets set. Notably, and as published in the new Guidelines, the new targets identified for the county extend to an annual growth target for the delivery of residential units of 2,068 between 2025 and 2034 and 931 between 2035 and 2040. This is in contrast to the existing annual 2020 housing required which was 745 and the adopted Development Plan annual housing target 1,411.

Section 2.3 and Policy and Objective 2 of the Guidelines specifically requires Planning Authorities to address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement i.e. Wicklow County Council should ensure that at the least, a minimum of lands zoned to accommodate 3,102 units per annum for the lifetime of current County Development Plan.

In addition, section 2.4 of the Guidelines require Planning Authorities in all instances to prepare a ‘Settlement Capacity Audit’ to identify lands with development potential in the short, medium to long term and zone / tier lands accordingly, particularly considering that the forthcoming Development Plan will have a 10-year lifespan.

In this context, it is imperative that Wicklow County Council has full regard to these Guidelines during the finalisation of the Arklow Local Planning Framework. The LPF must actively reflect the revised housing growth targets and demonstrate a clear, implementable pathway for their delivery. Arklow, as a key growth town within the County, is ideally positioned to contribute significantly to meeting these





revised targets, particularly given its strategic location, transport links, and availability of serviced, development-ready land such as that at Tinahask Upper, Money Little, and Money Big.

We therefore strongly urge the Planning Authority to adopt a proactive and forward-thinking approach in updating the LPF, ensuring that sufficient lands are zoned for residential use to meet both immediate and long-term housing demand. Aligning the LPF with these national directives will not only ensure statutory compliance but will also strengthen Arklow's role as a sustainable, compact, and well-connected urban settlement capable of delivering much-needed housing, supporting population growth, and underpinning economic resilience in line with the Government's national housing and infrastructure objectives.

3.3 Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)

The *Regional Spatial and Economic Strategy for Eastern and Midland Regional Assembly (RSES)* was published and adopted in 2019.

Arklow Town is considered to be within the 'Core Region' of the Eastern and Midland Regional Assembly (EMRA) and is earmarked for commensurate growth to become more self-sustaining and to attract high quality knowledge-based employment at strategic locations.

The RSES states that Core Region Key Towns *"have capacity and future growth potential to accommodate above average growth coupled with requisite investment in employment creation, services, amenities and sustainable transport."*

A noted growth enabler for the settlements in the Core Region includes *"Commensurate population and employment growth in Key Towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be within the existing built up area of settlements."*

Population Projections

Specific regional and county population projections to 2026 and 2031 are provided for each region in the "Implementation Roadmap for the National Planning Framework", which sets a growth trajectory for each area to be applied in the core strategies of all subsequent Development Plans and associated variations.

The overarching objective is to manage an adequate supply of land to 2026 and beyond that to 2031. The Regional Spatial and Economic Strategy for the Eastern and Midland Region specifically states the following:

"... the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes. Therefore, in planning for future growth, it will be important for planning authorities to set out and monitor the service capacity and likely rate of completion of development on zoned lands, both brownfield and greenfield as well as elsewhere, having regard to local conditions and trends."

In this respect, we note that population projections and associated zoned land supply are often considered to be maximum numbers to be allowed through the planning system rather than being a minimum effective supply to maintain sustainable levels of growth. Should housing allocation figures be taken as a maximum by Local Authorities, housing supply could be severely constrained, as longstanding market barriers and on-site constraints are often not adequately considered in the conversion rates of permitted housing to completed and occupied units.

In a review of the annual returns by the Dublin Housing Task Force (Department of Housing, Planning and Local Government) over the last 4 years, recent trends suggest that the average estimated conversion rate for residential units permitted, is in the region of 25%. Therefore, in order to deliver the number of completed and occupied units required in any given area, approximately three times as many units will need to be permitted to ensure adequate delivery of housing supply. By extension, this has obvious connections with the provision of zoned land to ensure adequate availability of residential sites.



We respectfully request the Planning Authority to have regard to the above in the formulation of the final LPF by ensuring that the accuracy as well as the basis of the population projections are fully considered, accurately presented using the latest Census 2022 figures; using the latest NPF and set out in the Plan and that the zoning of well placed lands in close proximity to public transport services is identified in the next stage of the plan making process.

3.4 Wicklow County Development Plan 2022-2028

Arklow is identified as a Level 3 - Self Sustaining Growth Town along with Greystones – Delgany and Blessington all three of these towns are targeted to accommodate 25% of the population increase in the county within the lifetime of the plan.

Core Strategy

The population target up until Q2 2028 for Arklow is identified below at 15,419.

Level	Settlement	Population 2016	Population target Q2 2028	% of total County growth to Q2 2028 by tier	
1	Bray	29,646	38,565	KEY TOWNS	49%
2	Wicklow - Rathnew	14,114	18,515		
3	Arklow	13,226	15,419	SELF SUSTAINING GROWTH TOWNS	25%
	Greystones - Delgany	18,021	21,727		
	Blessington	5,234	6,145		

Figure 5 – Wicklow County Settlement / Aggregate Settlement Population Targets 2016 – Q2 2028

As identified above the population is set to increase by 2,193 people from 2016 -2028. The Plan notes the infrastructure deficiencies in Arklow and Blessington, both of which were targeted for significant growth. However, since the adoption of the County Development Plan the Arklow WWTP has been completed by Uisce Éireann and there are no infrastructure deficiencies pertaining to development in Arklow.

We refer to the quantum of residential development in Arklow set out in table 3.5 of the development plan which is outlined below for the convenience of the planning authority. The Plan envisions an increase of 790 units from Q3 2022 – Q2 2028 and estimates that 100 units were completed from 2021 – Q2 2022.

Level	Settlement	Housing Stock 2016	Completions 2017-2020	Estimated completions 2021-Q2 2022	Housing Growth Q3 2022-Q2 2028	Housing Growth Q3 2028-Q4 2031	Total Housing Growth 2016-2031
3	Arklow	5,406	165	100	790	166	1,221
	Greystones - Delgany	6,766	875	400	508	170	1,953

Figure 4 – CDP Table 3.5 Arklow Settlement / Aggregate Settlement Housing Targets Q2 2028 – Q4 2031

The Core Strategy records the population of Arklow Town (Census, 2016) at 13,226; with only a minor increase for the 2022 Census to 13,399 or 173 additional people in this 6 year period. This is significantly below the 8.1% national average growth for the State.

The County Development Plan sets a population target of 15,419 to the end of 2028. Factoring in house completions in the town up to the 2022, the Development Plan estimates that the 2028 population target will require an additional 790 residential units from Q3 2022 to Q3 2028, which equates to 132 no. units per annum. This is the largest housing growth projection for any town in the County outside of Bray and Wicklow-Rathnew.

However, it is noted that since the start of Q3 2022, when the County Development Plan came into force, limited commencement notices have been lodged in the whole of Arklow.

Therefore, as it stands, approx. 788 additional residential units are to be provided in Arklow between now and Q3 of 2028, which is equivalent to 158 residential units per annum.

As it stands, given the current commencement rates, unit delivery will fall far short of that target.

To achieve the housing and population growth targets in the County Development Plan Q2 2028 of approx. 790 units in Arklow it is considered appropriate that the subject lands are brought forward as Priority 1 – Residential. We therefore conclude that there are no barriers to residential development at the Tinahask Upper lands. Having regard to the ‘sequential approach’, the subject site is readily available, deliverable and serviceable.

3.5 Arklow and Environs Local Area Plan 2018-2024

The LAP identifies Arklow as a ‘Level 3 – Large Growth Town II’ which is considered a priority town to accommodate a large amount of population growth. We request the Planning Authority to update the Town’s designation as a ‘Level 3 - Self Sustaining Growth Town’ as per the Wicklow County Development Plan 2022-2028 and to take into account that the Town is a ‘Core Region’ within the EMRA.

Core Strategy

The 2018-2024 set out much more ambitious housing and population growth targets than the current LPF as follows:

	Population (Existing / Target)	Housing Stock (Existing / Requirement)	Unit Growth Requirement
2016	13,313	5,396	
2022	19,494	7,509	+2,113
2025	21,247	9,838	+4,442
2028	23,000	11,185	+5,789

Table 1 - Arklow LAP 2018-2024 Core Strategy

Zoning

The subject lands are zoned ‘MU – Mixed Use’ to be developed as a mixed use residential (R20 & R28), employment (E1), local shops and services (LSS), community (CE) and open space zones (AOS, OS1). The objectives of these zonings are as follows:

- R20 “New Residential: To provide for new residential development at densities up to 20 units per hectare.”
- R28 “New Residential: To provide for new residential development at densities up to 28 units per hectare.”
- E1 “Employment: To provide for the development of enterprise and employment.”
- LSS “Local Shops & Services: To provide for small scale local neighbourhood shops and services.”
- CE “Community & Education: To provide for civic, community and educational facilities.”
- AOS “Active Open Space: To preserve, improve and provide for recreational public and private open space.”

- OS1 “Open Space: To preserve, improve and provide for parks, recreational public and private open space, green corridors and ecological buffer zones.”

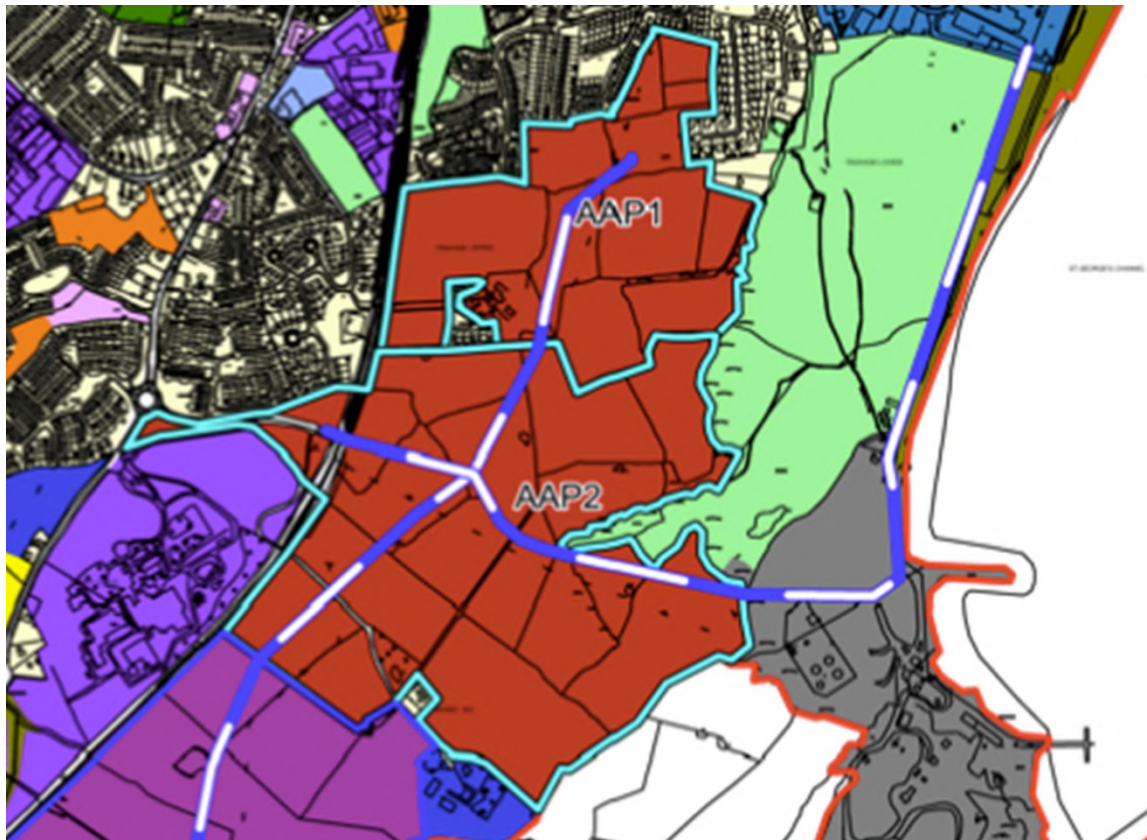


Figure 6 – Existing Zoning Map within Arklow and Environs LAP 2018-2024

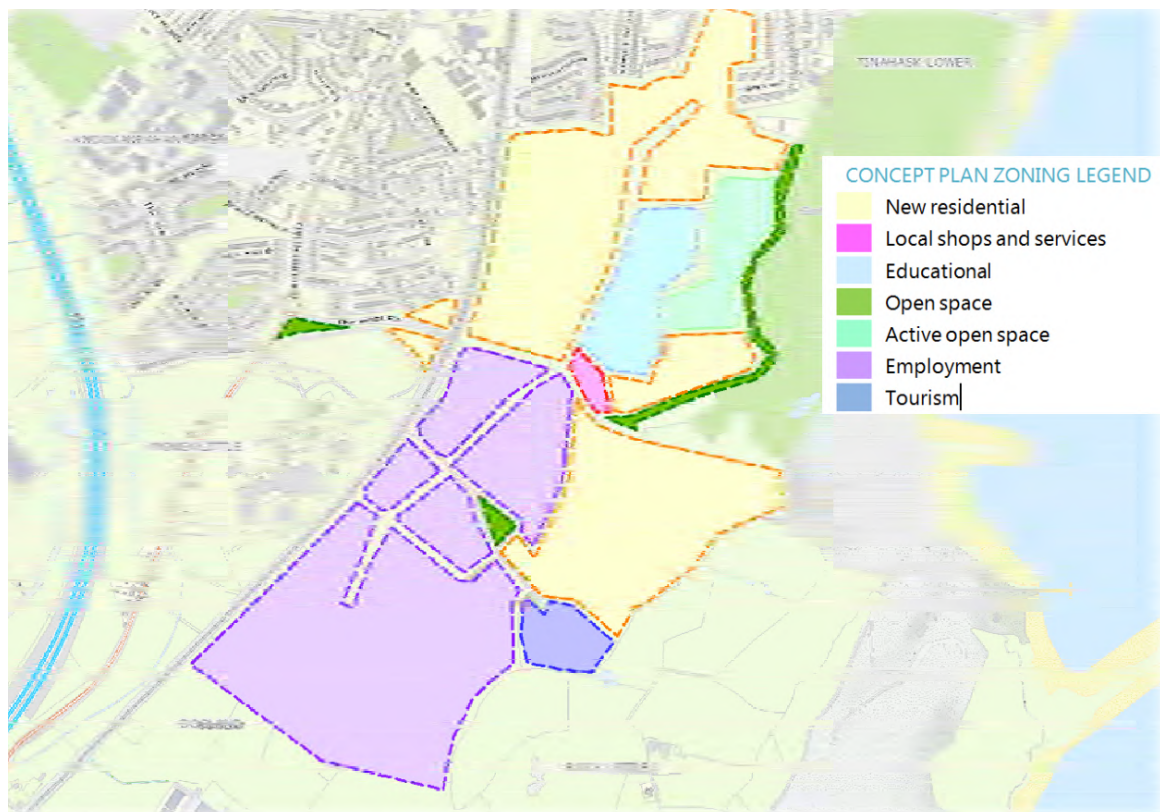


Figure 7 – AAP1 & AAP2 Concept Plan



It is noted that as part of the current Arklow LAP, our client's design team prepared and agreed an Action Area Plan with Wicklow County Council on 11 July 2023 as follows:

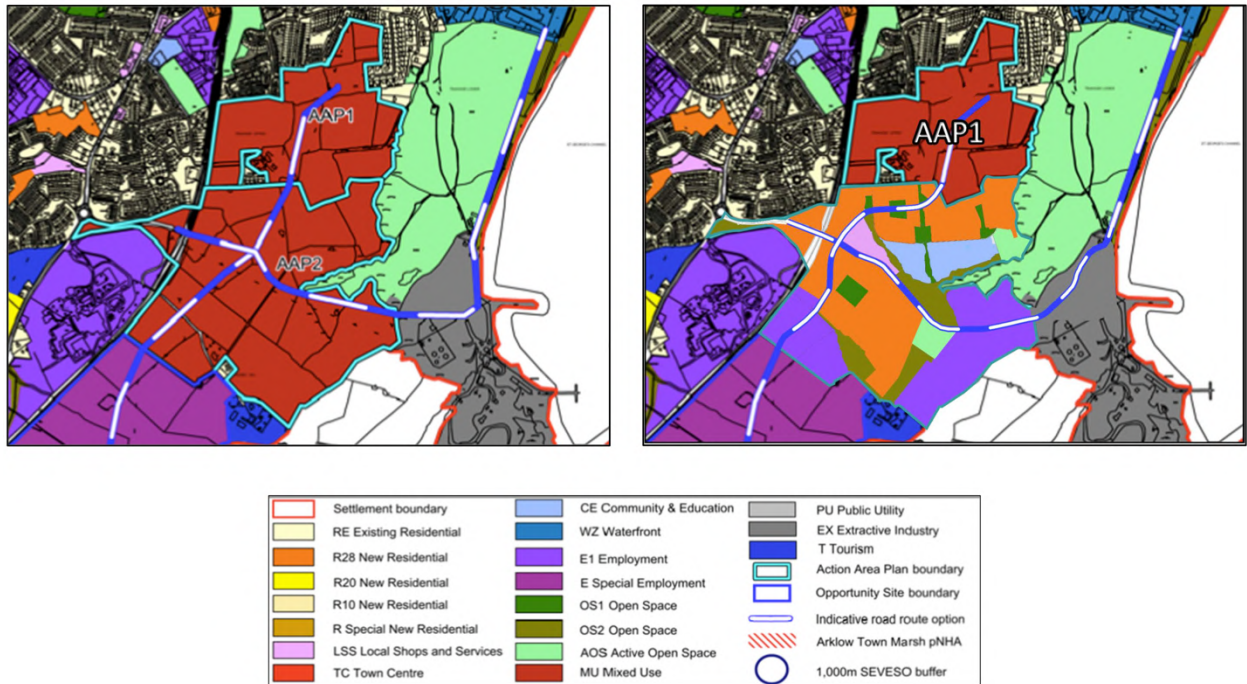


Figure 8 - LAP zoning vs Agreed AAP2 zoning objectives



4 Submission – Key Issues to be Addressed

4.1 Population and Housing

The Draft Arklow LPF sets out the population and housing targets for the settlement in accordance with the 2022 County Development Plan as follows:

Arklow	2016 Census	2022 Census	Q2 2028 Target	2031 Target
Population	13,226	13,399	15,419	16,441
Housing	5,406	5,585	6,461	6,627

Table 2 - Population / Housing Growth Targets for Arklow as per Draft LPF

The table above sets out that from the recorded Census 2022, the projected population growth is 3,042 people and 1,042 houses to the end of the lifetime of the LPF.

It is important to note that these projections were initially derived from the 2016 Census, which informed the Wicklow County Development Plan 2022-2028, setting growth targets for population and housing needs up to 2031. This plan set population and housing growth targets up to 2031.

Since then, no adjustments have been made to account for more recent data, particularly the Census 2022 figures, which are critical for recalculating population and housing needs. They fail to incorporate the most recent Census 2022 data and do not reflect the updated National Planning Framework (NPF) Implementation: Housing Growth Requirements – Guidelines for Planning Authorities (July 2025), which establish more ambitious and necessary housing delivery targets for all local authorities. Furthermore, the zoning mapping underpinning the Draft LPF does not appear to take account of permitted or commenced developments, resulting in an incomplete and potentially misleading picture of future housing capacity.

The continued reliance on obsolete 2016-based projections is wholly unacceptable in the current national housing context. Ireland is in the midst of an unprecedented housing crisis, and the role of local planning authorities is to respond proactively with robust, evidence-based and ambitious housing targets. Instead, the Draft LPF proposes growth figures that are less ambitious than those of the current Arklow Local Area Plan, representing a step backwards at a time when every available mechanism should be used to accelerate housing supply.

Whilst we appreciate that the Draft LAP must be cognisant of the Core Strategy of the Development Plan, the plan making process provides for an opportunity to address this matter and the Planning Authority is required to set out clear and evidence – based analysis which accurately identifies a correct housing yield requirement for the settlement.

Given the availability of updated data from Census 2022, we strongly urge Wicklow County Council to reevaluate the Draft LPF's methodology for projecting population and housing growth. An accurate approach would incorporate the most recent Census 2022 figures and reflect the updated national growth targets and the urgency of current housing demand. This adjustment would ensure that the LPF is aligned with current population trends and housing needs, helping to support sustainable and responsive planning in the settlement.

It is deeply concerning that Wicklow County Council has proceeded to prepare and publish the Draft Arklow LPF before updating the County Development Plan Core Strategy to reflect the most recent national guidance and population data. This sequencing is entirely backwards and risks embedding outdated and inaccurate targets into a statutory local framework that will guide development for years to come.

At the Ordinary Council Meeting of 6 October 2025, the Chief Executive, Ms. O’Gorman, acknowledged that a variation of the County Development Plan will be required later this year to update the Core Strategy in line with the new NPF Implementation Guidelines. This admission reinforces the fact that the LPF is being brought forward prematurely, based on superseded data and an obsolete Core Strategy.



It is entirely illogical and procedurally inefficient for the Council to first adopt an LPF grounded in outdated population and housing figures, only to later have to revisit and vary both the CDP and every subsequently adopted LAP/LPF to bring them into alignment with the updated national and regional targets. This fragmented and reactive approach adds unnecessary complexity, administrative burden, and uncertainty for the development sector.

In our professional opinion, the proper and logical course of action would have been to first update the County Development Plan Core Strategy in accordance with the NPF Implementation Guidelines (July 2025) and Census 2022 data. Only then should the Council proceed to prepare and adopt the Draft LPF and subsequent LAPs, ensuring that all local frameworks are coherent, data-led, and policy-aligned from the outset. Proceeding otherwise not only undermines the integrity of the LPF process but also risks delaying much-needed housing delivery due to the inevitable requirement for subsequent variations and corrections.

Accordingly, we strongly urge Wicklow County Council that prior to the adoption of the Draft Arklow LPF the County Development Plan Core Strategy is formally updated. This must be done now before the LPF is adopted to ensure that all planning frameworks within County Wicklow are aligned with the latest national housing targets and demographic realities. Anything less represents a piecemeal and inefficient approach to plan-making that is incompatible with the urgency of Ireland's housing situation.

Section 2.4 of the Draft LPF states that it will ensure:

“adequate zoned land and supporting objectives to allow for the housing targets, as set out in the County Development Plan prevailing at the time of the adoption of this LPF, to be met.

The lands that are needed to be zoned to meet the current target will be zoned ‘New Residential’ and identified in this LPF as ‘New Residential Priority 1’ lands.

In order to ensure an adequate future supply of housing lands, should the need arise for their development having regard to any changes to housing targets that might arise during the lifetime of this LPF with particular regard to the new housing targets for County Wicklow set out in the ‘NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities’ issued by the Minister under Section 28 of the Planning & Development Act (July 2025), additional lands shall be zoned - ‘New Residential’ and identified as ‘New Residential Priority 2’ which shall only be considered for consent where it can be shown that such development would accord with the Core Strategy targets after the activation of Priority 1 lands.

It is our professional planning opinion that this approach is overly restrictive for promoting an increased supply of residential development. The requirement to exhaust Priority 1 lands before Priority 2 will significantly hinder the timely delivery of housing, as certain Priority 1 sites might face development constraints, such as ownership complexities, infrastructure requirements, or other site-specific challenges. Consequently, this restriction on Priority 2 lands could prevent critical residential areas from being developed within the LPF's lifetime, potentially and again, leading to a shortfall in meeting housing growth targets. This sequential approach ignores the realities of land delivery and contradicts national guidance, which emphasizes flexibility and responsiveness in zoning to ensure a continuous pipeline of housing.

We therefore call on the Planning Authority to abandon or significantly revise this phasing mechanism and to adopt a more flexible, evidence-led approach to the release of RN2 lands. This will ensure that sites capable of delivering housing within the plan period are not artificially constrained by inactive or unserviceable Priority 1 lands.

We refer the Planning Authority to the Development Plan Guidelines for Planning Authorities, 2022, wherein Section 4.4.1 states the following:

“It is a policy and objective of these Guidelines that zoned housing land in an existing development plan, that is serviced and can be developed for housing within the life of the new development plan under preparation, should not be subject to de-zoning.

Should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended best practice that a phased approach be taken to





prioritise the preferred sequence of development of such sites. However, **phasing should be applied where there is a sound planning rationale for doing so**, based on factors such as site location, the availability or proximity of, or capacity to provide, off-site services, facilities or infrastructure. This should also be viewed in the context of the urgent need to increase housing supply.

Phasing may not be necessary where the planning judgement is that unconstrained zoned and serviced housing sites are of broadly equivalent merit for development purposes in a particular settlement or area at the plan-making stage. In all cases, whether phasing is applied or not, **development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.**

It is also best practice that in cases where land is zoned and has remained undeveloped and unserved through one or more development plan cycles, with no prospect of being serviced within the six-year life of the development plan that is under preparation, alternative approaches must be considered:- (i) alternative zoning objectives or (ii) discontinuing the objective.”

Further, Section 4.4.3 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.

Ireland faces a national housing crisis that demands ambitious, proactive, and flexible planning at every level of government. The Draft Arklow LPF, as currently written, fails to reflect national policy direction, undermines delivery potential, and sets unacceptably low growth targets that fall short of the town’s capacity and strategic importance within County Wicklow.

A planning framework that reverts to outdated projections, ignores updated Census and NPF data, and restricts active, serviceable residential lands cannot be justified. Arklow has the potential to accommodate significant, sustainable growth and the LPF must be revised to ensure that the town plays a leading role in addressing Ireland’s urgent housing needs.

We are in a period of crisis in terms of housing delivery nationally and the conservative approach to zoning allocations and phasing of suitable sites for development by Wicklow County Council is a fundamentally inappropriate approach to plan making.

4.2 Residential Zoning

Section 3 of Part B of the LPF sets out that:

“Limited residential development has occurred in the settlement of Arklow under the previous two Local Area Plans due in part to the economic downturn and in the case of the most recent plan due to the lack of waste water treatment infrastructure. Census data shows that Arklow has a declining population of 0-5 year olds in the settlement, likely due to lack of new household formations in the settlement, and shows a slow population growth rate noting that the 2018 LAP was framed around a population target of 19,494 people by 2022. The 2022 Census results show a population at just 13,399, an increase of just 1.8% over 6 years (0.3% pa).”

It is an aim of the LPF to focus new residential development into the existing serviced built up envelope of the settlement on ‘Town Centre’, ‘Waterfront Zone’ and ‘Existing Residential’ zoned sites. This is supportive of compact growth principles however, we would note that a minimum of 30% of the targeted housing growth shall be directed into the built-up area of the settlement. In order to ensure however that overall housing and population targets are not exceeded to any significant degree, the amount of land zoned for the housing development outside of the built up envelope of any existing settlement shall not exceed 70% of the total housing target for that settlement. Using this guideline, approximately 312 of the projected 1,042 residential units required by 2031 would need to be developed



within the existing built-up area. The remaining 730 units, which must adhere to the 70% limit, would be allocated for development in peripheral or greenfield areas around the settlement.

The final LPF must deliver on the potential to realise opportunities available to the town to cater for families and social and affordable housing. Families generally seek to secure housing where there are locational advantages that offer open space, a back garden and general sense of place. Town Centre sites are not appropriate for this offering and the market needs to ensure that appropriate locations within close proximity of the town are selected and brought forward. For these areas outside the built-up area, the Draft Plan has identified the following:

- *“Edge of centre locations will be considered the priority location for such new greenfield residential development and will generally be zoned as ‘New Residential - Priority 1’ (zoned RN1). These sites are generally within a 15 minute walk of the Arklow Main Street and/or a 15 minute walk of Arklow Train Station.*
- *More ‘out of centre’ housing sites (zoned ‘New Residential – Priority 2 – RN2) will only be considered where Objective ARK 18 is satisfied and other basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area.*
- *In order to be cognisant of extant permissions and / or the key role that some sites will play in the delivery of essential infrastructure, it may be necessary for some ‘out of centre’ sites to remain as Priority 1.*
- *New residential areas may be subject to ‘Specific Local Objectives’ (SLO) designation – the purpose of the SLO is to guide developers as to the land use / infrastructure / phasing requirements for the lands... and development objectives applicable to three new residential neighbourhoods in Arklow, including supporting physical, social and community infrastructure.”*

It is evident that Wicklow County Council’s approach is fundamentally backwards. The current zoning designations and housing targets have been drawn up without the benefit of up-to-date population data (e.g., Census 2022), updated national housing targets, or a comprehensive settlement capacity audit. By advancing this process based on outdated figures, the Planning Authority is effectively restricting Arklow’s growth potential at a time when ambitious, flexible planning is required.

This is especially concerning given that the LPF targets just 30% of the housing requirement to be located within the existing built-up area of the settlement, while the remaining 70% is allocated to peripheral or greenfield sites. The underlying assumption is that the town’s development potential is inherently constrained within the existing envelope. However, this assumption fails to recognize the broader development potential of key peripheral sites and outlying areas, which could accommodate far more housing than currently projected.

Moreover, the specific zoning designations within the LPF particularly the differentiation between Priority 1 and Priority 2 sites lack clear, evidence-based reasoning. It appears that no Settlement Capacity Audit has been undertaken, which is a critical flaw in the zoning process. Without such an audit, there is no objective basis to justify why certain sites are zoned Priority 1 while others are relegated to Priority 2. This could lead to the unnecessary restriction of development-ready sites, thus limiting the potential for future residential development in critical areas, while delaying housing delivery.

The failure to address infrastructure readiness, environmental constraints, and accessibility in zoning decisions means that viable, serviceable sites may be underutilized, and land with serious constraints may be prioritized. This scenario is counterproductive and prevents Arklow from reaching its full growth potential within the LPF timeframe.

To this end, we highlight that the planning authority has not provided a clear, evidence-based rationale for the specific zoning designations assigned to each site within the Draft LPF. Best planning practices dictate that zoning decisions, especially those that will have a significant impact on housing delivery, should be informed by a thorough, data-driven Settlement Capacity Audit. This type of audit would assess the capacity of each site to support sustainable development, taking into account factors such as infrastructure readiness, accessibility, environmental constraints, and proximity to essential services.

Without this evidence-based approach, the zoning allocations appear arbitrary and lack the transparency necessary for stakeholders to understand why certain lands were designated as Priority 1

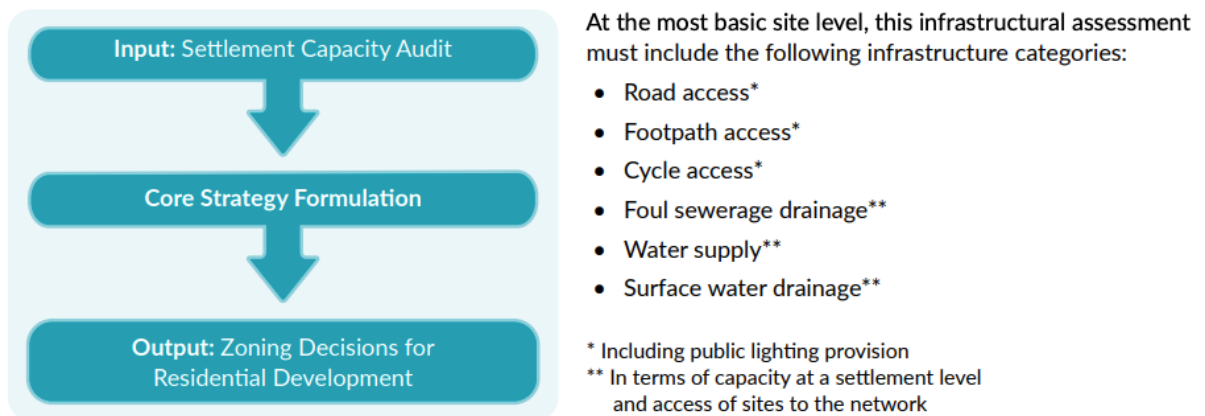
while others were deferred to Priority 2. This lack of justification raises concerns that certain viable sites may remain undeveloped simply because they were not prioritised, which could inhibit the timely delivery of housing and undermine the LAP's overall objectives. Whilst we acknowledge that the Planning Authority prepared an Infrastructure Assessment & Implementation Programme, the Planning Authority did not provide a site-specific analysis of each zoned site, as would be required.

There are clear requirements for the preparation of a Settlement Capacity Audit under the Section 28 Ministerial Guidelines 'Development Plans – Guidelines for Planning Authorities'.

We note specifically that section 3.2.2. of the Development Plan Guidelines for Planning Authorities sets out that "A Settlement Capacity Audit should also be undertaken to identify zoned services/serviceable lands with residential development potential". Furthermore, Section 4.5.2 of the Guidelines outlined that a Settlement Capacity Audit "distinguishes between lands that are 'Served' (Tier 1) and those that are Serviceable' (Tier 2). This is to ensure that **an informed decision can be made as to whether or not to zone land or sites in particular settlement for residential development....**" The Guidelines importantly go on to state the following in Appendix A:

"A Settlement Capacity Audit is now a key research task of the development plan preparation process to be undertaken by a planning authority. The work should seek to identify and map zoned residential (and mixed-use zoned) lands with residential development potential. This will include (i) lands within the existing built up area (ii) serviced greenfield 'Tier 1' tranches of land and (iii) serviceable greenfield 'Tier 2' lands."

The zoning of lands subject of the LPF has not been carried out in accordance with a comprehensive and supporting Settlement Capacity Audit.



Further, of the 8 sites currently zoned as Residential – Priority 1, it is worth highlighting that 3 of the sites have an existing valid planning permission, some of which have already commenced or are in the process of commencing. The presence of active permissions on these sites demonstrates a level of certainty in their development potential, which should be taken into account when considering the overall housing delivery strategy.

However, it should also be noted that 3 of the sites within the Priority 1 zoning category lack any associated planning history or have permitted development for a small portion of the lands (i.e. SLO3 and SLO5). This raises concerns about the viability of these sites contributing to the housing supply in the short to medium term as these sites have been zoned for residential in many cases, for over a decade. The absence of any planning history on these sites could indicate that they may not be as readily developable as the sites with existing permissions, or they may face additional barriers to development.

This issue further emphasises the need for the Planning Authority to reconsider the overall distribution and allocation of land, particularly in relation to the balance between Priority 1 and Priority 2 sites, to ensure that there are enough viable and appropriately zoned lands to meet the housing targets. The current Draft LPF approach is not in compliance with the Development Plan Guidelines which states that:

“development plans must build in sufficient flexibility to ensure that housing development not progressing on one or more sites cannot operate to prevent other suitable sites that may be developed within the life of the development plan, from coming forward.”

In light of this, we strongly urge the Planning Authority to ensure that sufficient flexibility is incorporated into the final Plan. The strict sequencing of Priority 1 and then Priority 2 site activation, as currently proposed, risks unnecessary delays in housing delivery, particularly if the development of Priority 1 lands with planning history faces any unforeseen obstacles. The guidelines clearly advocate for a more adaptable approach that allows other sites such as suitable Priority 2 sites to be brought forward earlier if the progress of Priority 1 sites is hindered.

Given the urgency of addressing the significant housing demand in the area, we respectfully request that the Planning Authority take these concerns into account and amend the Draft LAP to reflect a more balanced and realistic approach to residential zoned land allocation. This should include a thorough reassessment of the Priority 1 and Priority 2 site distribution by way of an evidence-based Settlement Capacity Audit, ensuring that sufficient Priority 1 lands are allocated to meet the housing target. We believe that, in light of recent planning history, a number of sites currently zoned as Priority 2 could be re-designated as Priority 1, providing a more immediate and viable solution to the overall national housing shortfall. Such adjustments would ensure that the LAP supports the timely delivery of the housing that is urgently needed, while also aligning with the spirit of the Development Plan Guidelines, which emphasise flexibility and the importance of adaptability in land allocation strategies.

In addition, we remind the Planning Authority of the requirement stipulated by Section 2.3 and Policy and Objective 2 of the NPF Implementation Guidelines, 2025 which specifically requires Planning Authorities to address the scope for additional provision of up to 50% in excess of the baseline housing growth requirement; i.e. if the Planning Authority is satisfied that the housing growth requirement for Arklow up to 2031 is 1,042, then there should be sufficient zoned lands to accommodate at least 1,563. It is therefore incumbent on the Planning Authority to ensure that there is sufficient, viable, and deliverable Priority 1 land to meet both baseline and additional growth capacity. We also note that several long-zoned RN1/Priority 1 lands outside defined SLO areas have not progressed over multiple plan cycles, further illustrating that zoning alone does not guarantee delivery and should prompt a reassessment of their status.

In our professional planning opinion, the lack of a comprehensive Settlement Capacity Audit and the failure to update zoning allocations based on the most current demographic and infrastructure data severely undermines the credibility and deliverability of the Draft Arklow LPF. Without an objective, evidence-based methodology, the zoning process remains arbitrary and could lead to inefficient land use, potentially restricting housing supply rather than supporting it.

We therefore strongly urge the Planning Authority to pause the adoption of the Draft LPF until a comprehensive Settlement Capacity Audit has been carried out. This audit should thoroughly assess the development potential of all residential sites (RN1 and RN2), taking into account up-to-date infrastructure assessments and Census 2022 data. This process will ensure that the LPF is transparent, robust, and aligned with current housing needs, ultimately helping to unlock Arklow’s true growth potential and addressing the urgent need for residential development in the region.

4.3 Key Findings

From the assessment of population figures and projections for Arklow, and of the nature and quantum of residential development land zoned in the Draft LPF document we draw the following conclusions:

- Planning for Arklow must be firmly grounded in the population growth trajectory set out in national and regional policy, ensuring that sufficient lands are zoned not only to accommodate growth within the plan period, but also to safeguard capacity beyond it. This must be informed by an evidence-based, sequential and infrastructure-led approach to zoning decisions, ensuring long-term sustainability and compliance with statutory planning guidance.
- Our assessment of lands currently designated New Residential – Priority 1 highlights a clear disconnect between theoretical zoning capacity and actual delivery potential on the ground. While targets and zoning provisions exist on paper, the pace of real development activity in

Arklow demonstrates that some currently zoned lands are unlikely to contribute to the required housing output within the plan timeframe. This divergence emphasises the need to reassess and rationalise the current land-use strategy.

- The forthcoming LPF for the town must address the current under provision of housing through a strategic designation of land that can, in reality, ‘immediately’ deliver new homes to address the population forecasts and certainly over the LPF plan period. This is easily achievable by way of the appropriate designation and zoning of land that is (a) within the town development boundary, (b) accessible, and (c) serviced.

We respectfully urge the Planning Authority to reconsider the reduced growth trajectory currently proposed. Instead, the LPF should adopt a more ambitious, future-proofed approach in line with the Revised National Planning Framework, enabling Arklow to realise its full strategic potential, particularly in light of significant planned infrastructure investment, improved connectivity, and its established role as a key growth centre in the region.

Such an approach will support a balanced and sustainable urban expansion, generating long-term economic, social and community benefits, and ensuring that Arklow remains competitive and resilient.

However, it is our view that the Draft LPF as published has failed to:

- Incorporate accurate and up-to-date population growth assumptions and housing delivery forecasts;
- Provide a sufficient quantity and mix of appropriately zoned residential lands capable of supporting both baseline and contingency growth requirements; and
- Allocate our client’s lands an appropriate residential zoning designation, despite their clear suitability, strategic location, and readiness to deliver new homes.

4.4 Southern Port Access Road

Section A3.2 of the Draft LPF clearly recognises the critical role of the Southern Port Access Road (SPAR) in addressing long-standing traffic and accessibility challenges in Arklow. It notes:

*“A significant impediment to accessibility and public realm improvements in the town centre (particularly in and around Lower Main Street) and the south quay / harbour / Tinahask area, as well as on the Nineteen Arches Bridge, is the presence of significant flows of commercial traffic and HGVs in these areas... As per previous development plans and transport studies for Arklow the identified solution to this issue lies in the construction of a **Southern Port Access Road** from Knockmore to the south of the town into the south quay / harbour area, connecting into the Roadstone Quarry. This route has been examined further in the Draft LTP and it has confirmed that **this is a necessary and high priority project.**”*

The Draft LTP reinforces this position, listing the delivery of the SPAR, traversing our client’s lands, as a key short-to-medium-term transport objective required to unlock wider town centre public realm improvements and remove HGV traffic from constrained heritage areas.

Section A3.2.1 of the Draft LPF states that:

*“With respect to the identified priority need in the Draft LTP for a **Southern Port Access Route** to address serious traffic issues in the town centre / harbour / south quays areas, **it is considered that the lands that would partially deliver the route / be opened up by the route should be identified as Phase 1 / Priority 1 lands for development in the lifetime of this LPF.**”*

This position is fully consistent with the Draft LPF’s wider objectives, including:

Objective ARK 74: *“Within the Town Centre to support and promote the enhancement of the public realm by:*

- *Supporting the development of the Southern Port Access Route to facilitate the reduction of HGV traffic from the town centre...”*

Objective ARK 82: *“Support and promote the development of the following new regional / distributor roads and road improvements:*

- *The Southern Port Access Road (SPAR) to (a) facilitate development in SLO4 (Tinahask – Money Big) and (b) provide a more suitable road network for larger vehicles and reduce reliance on the South Quays and Nineteen Arches Bridge for HGV movement and (c) ensuring safer conditions are provided for active travel improvement in Arklow Town Centre, the Nineteen Arches Bridge and along South Quay.
The design of the road including its final alignment and boundary treatments shall take into account its proximity to the coastline whilst ensuring minimal impact on Arklow Golf Club and the Roadstone Quarry.*
- *To require as part of the development of SLO4 (Tinahask – Money Big) the development of the distributor road access to SLO3 (Abbeylands – Tinahask) to the north and to the employment zoned lands to the south...”*

In addition, we note that Section 9.4 of the accompanying Local Transport Plan for the Arklow LPF recommends the delivery of the SPAR in the short-medium term i.e. up to 2031.

Having regard to the classification of the SPAR as an unequivocally ‘necessary and high priority project’ in Arklow for the alleviation of traffic in the wider area. Given its strategic importance and the fact that the route runs through the Tinahask – Money Big lands (SLO4), it is imperative that appropriate residential zoning and phasing is applied to ensure that the road corridor can be delivered at the earliest stage.

It is noted that the lands proposed to be zoned RN1 within SLO4 have permission for the entire extent of this zoning to provide 476 no. residential and a limited portion of the SPAR to allow access into the development. The permitted development will also provide a distributor road to the SLO3 lands opening them up for development. As such, it was clearly outlined in the planning application that the remainder of the SPAR to the Roadstone Quarry would be provided as part of Phase 2 of residential development of the southern portion of the lands currently zoned RN2.

Given the urgent policy priority assigned to the SPAR and its essential function in unlocking both mobility benefits and residential/employment development, the LPF must follow through on its own stated strategic position, namely, that *“the lands that would partially deliver the route / be opened up by the route should be identified as Phase 1 / Priority 1 lands for development in the lifetime of this LPF.”* As such, it is imperative that the southern portion of the lands within SLO4 are provided the appropriate RN1 zoning rather than RN2.

Accordingly, the southern portion of SLO4 must be upgraded to RN1 (Priority 1) zoning rather than RN2 to ensure the coordinated, timely and feasible delivery of the full SPAR alignment.

Failure to apply RN1 zoning to these lands would:

- contradict the LPF’s stated transport and development strategy,
- delay a regionally significant road project,
- perpetuate existing town centre congestion and HGV dominance, and
- undermine the town’s ability to achieve compact growth, active travel enhancements, and sustainable development outcomes.

In summary, the SPAR cannot be delivered in accordance with acknowledged priority timelines unless the entirety of the SLO4 lands required for its delivery are zoned RN1. We therefore request that the LPF be amended to reflect this requirement.

4.5 Local Transport Plan Objectives

The accompanying Local Transport Plan (LTP) sets out a comprehensive programme of active travel and public transport interventions for Arklow across short-term (to 2028), medium-term (to 2031) and long-term (to 2042) horizons. These proposals are highly relevant to our client’s lands, particularly given the strong emphasis on sustainable mobility, modal shift, and infrastructure-led development. The relevant provisions of the LTP as they relate to our clients lands are set out below:

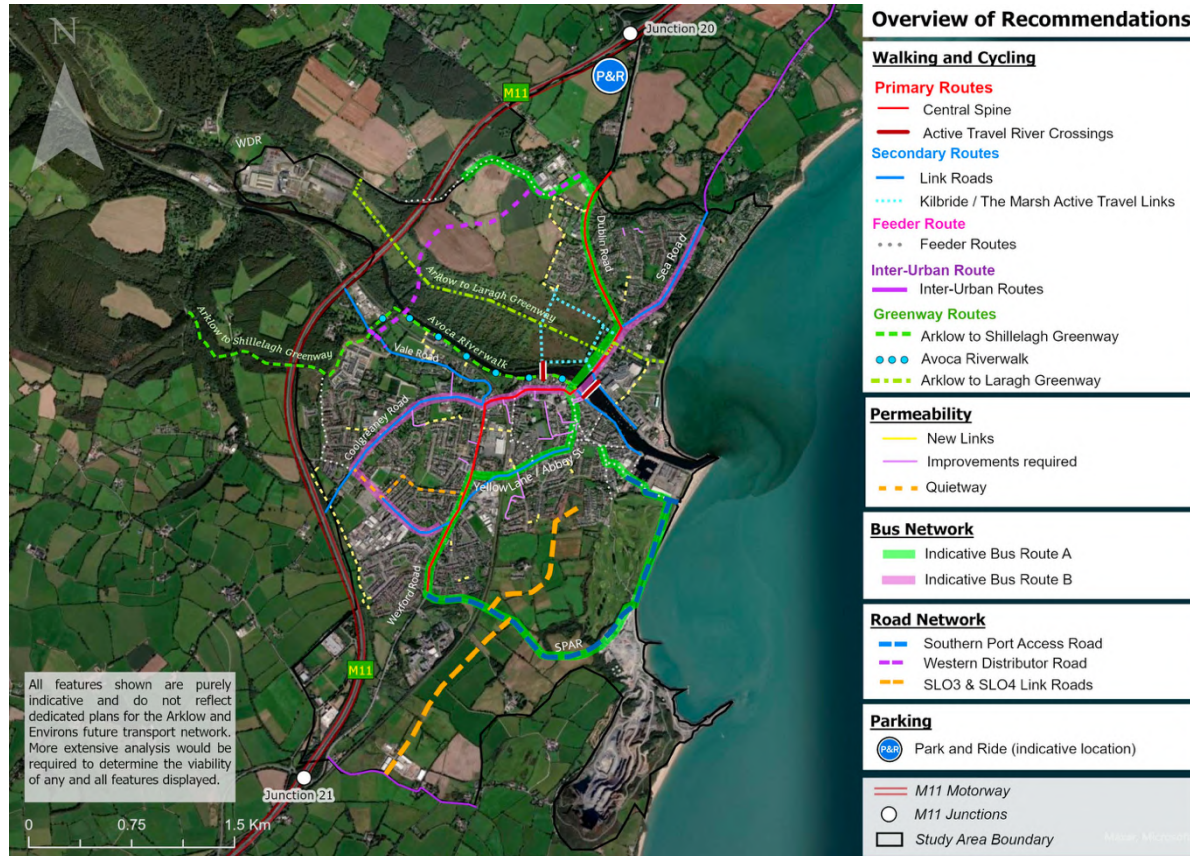


Figure 9 - Overview of Proposed LTP Recommendations

The LTP confirms a number of key transport priorities, including:

- Delivery of the SPAR in the short-to-medium term, identified as a “primary route” that will incorporate dedicated active travel facilities as part of its design.
- Provision of two new town bus services, including Route A, which is proposed to connect South Quay to Kilbride Industrial Estate via the SPAR, and is identified as a desirable medium-term objective.

The SPAR therefore functions not only as a strategic vehicular bypass, but also as a core spine for active travel and future public transport, supporting key objectives of the NPF, RSES and the National Sustainable Mobility Policy.



Figure 10 - LTP Indicative Town Bus Services for Arklow

The SPAR is required to be delivered in tandem with development on the lands through which it passes. Our client's lands play a critical enabling role in securing this infrastructure and associated sustainable transport measures.

Having regard to the overall importance of the SPAR for alleviating traffic in the Town Centre and wider Arklow area and the potential for a bus route to run through the SPAR, all in the medium term, it is imperative that an appropriate zoning and Priority 1 designation is applied to the southern portion of the residential zoned lands (RN2) as the SPAR would be provided in tandem with the residential development of the southern portion of these lands. Otherwise, having regard to the RN2 zoning designation of these lands and the strict requirement that 75% of Priority 1 lands shall be delivered before RN2 lands can be activated, there is no opportunity for the delivery of the SPAR in the short to medium term in this regard. In effect, the LPF currently plans for infrastructure without enabling its delivery.

The Draft LPF acknowledges the necessity for short to medium-term infrastructure improvements to enhance connectivity, promote active travel, and bolster public transport within this area. The inclusion of these improvements suggests a recognition of the strategic importance of these lands for the town's overall development and infrastructure network.

However, by not envisioning any development potential for these lands within the lifetime of the plan (RN2 designation), the Council seems to be sending mixed signals. On one hand, the identified improvements indicate that the area is ripe for development and essential for enhancing the town's connectivity and sustainability. On the other hand, the lack of development potential undermines these very objectives, delaying the benefits that such infrastructure would bring to the community.

Our client is keen to understand the reasoning behind this apparent contradiction. We seek clarification on how the identified short to medium-term improvements align with the broader development goals

of the plan. **Specifically, we request that Wicklow County Council provide a detailed explanation of how these measures are expected to function effectively without concurrent development.**

Moreover, we propose that the Council reconsider the development potential of these lands within the plan's lifetime (redesignation as RN1). Integrating development with the planned permeability, active travel, and public transport measures will not only enhance the area's functionality but also contribute to the overall strategic objectives of sustainable growth and improved urban living standards.

We urge the Planning Authority to provide clear and coherent planning strategies that align infrastructure improvements with development potential. This approach will ensure that Arklow can fully realise the benefits of its strategic assets and planned investments, fostering a well-connected, sustainable, and thriving community.

4.6 Overview of SLO4 – Tinahask Upper – Money Little and Money Big

The Draft LPF includes a number of Specific Local Objectives for parcels of land, with an objective:

“to guide developers as to the aspirations of the LPF regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for ‘mixed use’ to give more detail on the development objectives for these lands. A masterplan for an entire SLO area may be required to be submitted as part of the first application within an SLO.

For a number of the SLOs concept sketches are shown in this LPF. These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs.”

The acknowledgement that SLO concept sketches are flexible is welcomes and necessary to ensure that concept plans evolve in response to detailed technical studies, topographical constraints, phasing considerations and design development.

Our client's landholding is included as 'SLO4 – Tinahask Upper – Money Little and Money Big' as follows:

This SLO is located on the south side of the town, in the townlands of Tinahask Upper, Money Little and Money Big. The site is bounded to the north by SLO3, to the east by the golf club and quarry site, to the south by open farmlands and to the west by the railway line. Access to this land is currently provided by an access road and railway bridge from the Knockmore roundabout.

This SLO area measures c. 70ha and shall be developed as a mixed use area comprising of c. 27.2ha of new residential development (c. 11.7ha RN1 and 15.5ha RN2), c. 9.75ha of new employment (E1), c. 1.75ha for local shops and services (LSS), c. 4.5ha for community and education use (CE) and c. 16.35ha of open space areas (c. 4.75ha AOS, c. 1.1ha OS1 and c. 10.5ha OS2).

An 'Action Area Plan' (masterplan) under the previous LAP has already been agreed for these lands and consent has already been secured for the development of a 19.3ha area of this SLO, comprising the development of: 476 no. residential units on the RN1 lands; public open spaces including a new public park; a local shops and services zone comprising retail units, a community centre and office space; a childcare facility and temporary upgrade works to the existing railway bridge and construction of part of the Port Access Road.

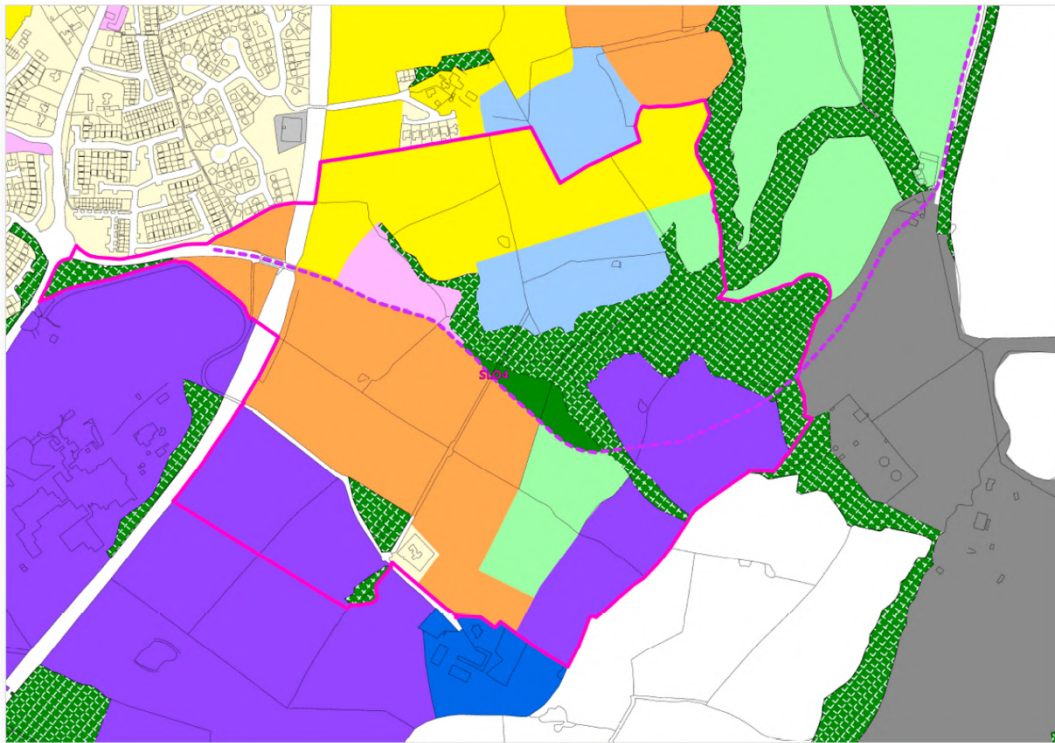


Figure 11 - SLO4 Zoning Map

A Concept Plan for the development of SLO4 is also included in the Draft LPF as follows:

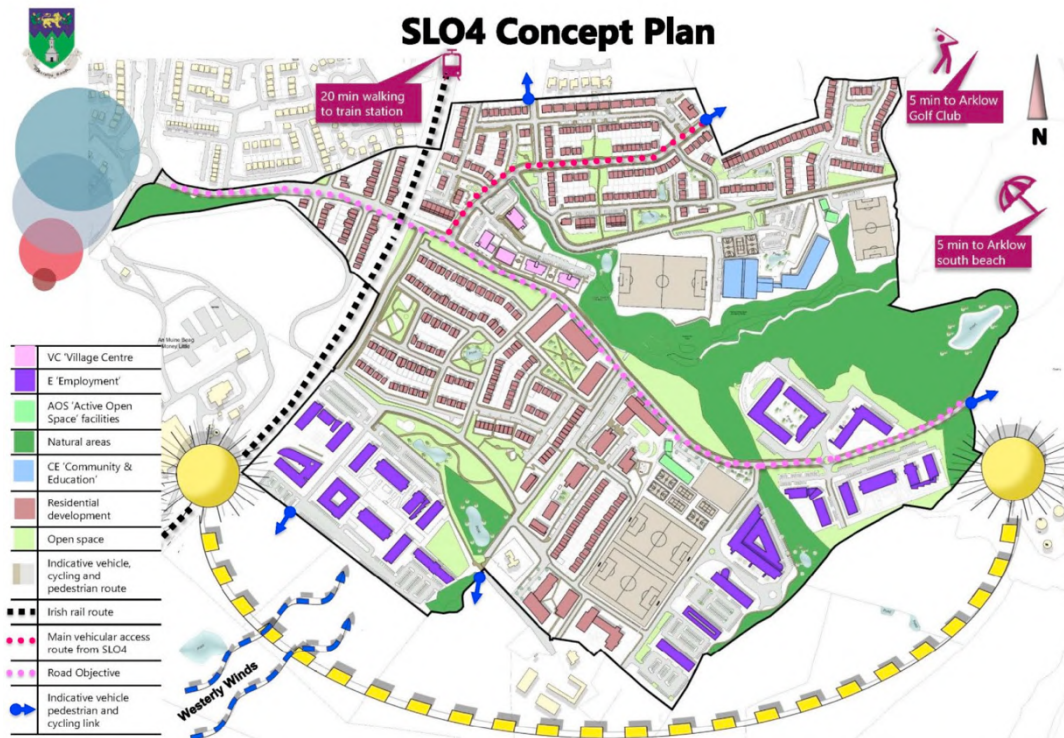


Figure 12 – SLO4 Concept Plan

We welcome the inclusion of a concept plan for SLO4 in the Draft LPF, which provides a strategic development framework for this important growth area. However, we emphasise that future phases of development must allow for reasonable flexibility, particularly in light of topographical variations across the site; engineering and infrastructure solutions yet to be finalised; evolving best practice in urban



design and sustainability standards, and; phasing requirements linked to the delivery of the SPAR and active travel corridors.

Accordingly, we support the designation of the drawing as a “Concept Plan” and request that the LPF continue to recognise the need for adaptive and responsive design solutions to ensure the optimal and deliverable development of the lands.



5 Rezoning Request

As set out at the beginning of this submission, our client controls approx. 38.58 ha of lands within SLO4 at Tinahask Upper – Money Little and Money Big. The northern portion of the lands have an active permission for the delivery of 476 no. residential units, a childcare facility and a neighbourhood centre and are lands which are zoned RN1. The southern portion of their lands are zoned RN2 under the draft LPF. This southern portion of lands is considered to be significantly opportune for the delivery of not only housing but also the Southern Port Access Route.

The southern portion of the landholding is, however, identified as Residential – Priority 2 (RN2) under the Draft LPF. This southern area represents a critical and sequentially appropriate development parcel which directly adjoins the already permitted Phase 1 area, is capable of delivering further residential units at scale, is essential to completing the SPAR in full, and supports the functioning of the permitted neighbourhood centre and childcare facility.

Given its strategic role in enabling housing delivery, strategic road infrastructure, active travel corridors, public transport connectivity, and community services, it is both logical and necessary that the southern portion of the lands be rezoned as Residential – Priority 1 (RN1).

This section presents the planning rationale for this request and demonstrates why the subject lands are ideally positioned to deliver sustainable, timely, and policy-aligned growth in Arklow.

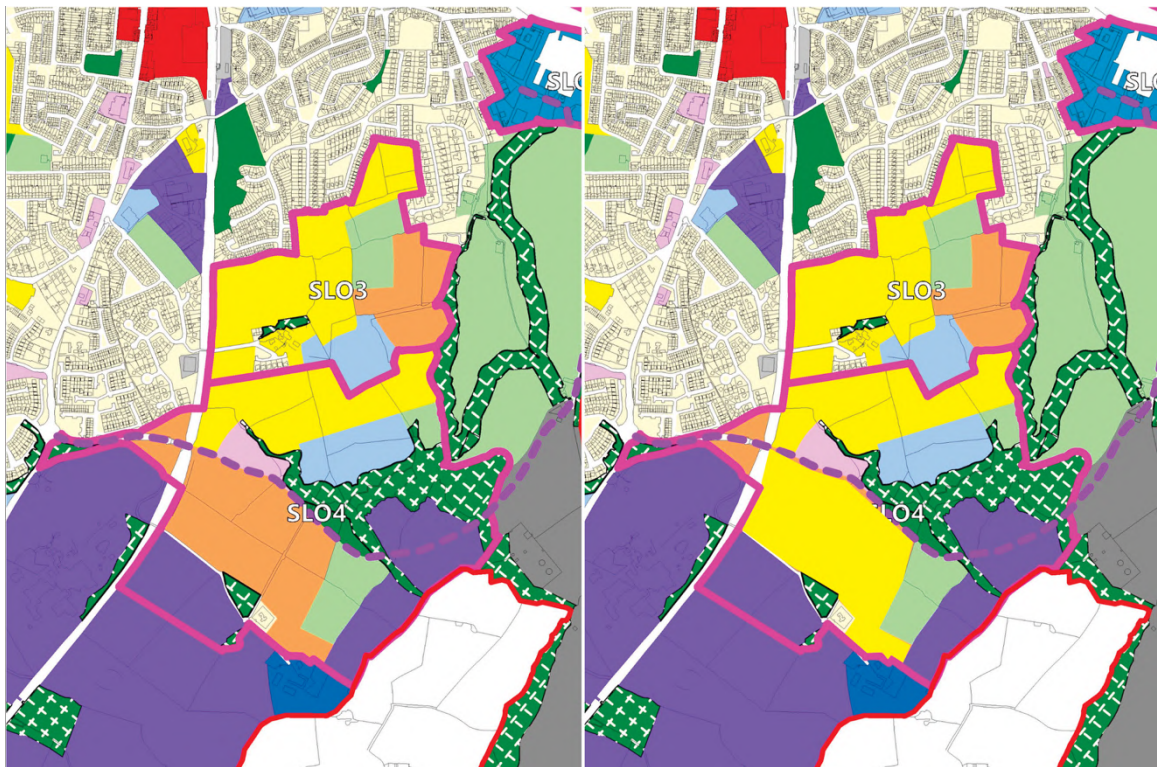


Figure 13 - Draft LPF Zoning vs Requested Zoning as part of this Submission

5.1 Site History

This section details the recent and relevant history for the lands at Tinahask – Money Little and Money Big. The lands in our client's ownership have a demonstrable track record of active progression and investment.

Since purchasing the lands, our clients have taken significant steps to bring forward development on these lands.

Over the course of 2022, our clients assembled and instructed a full multidisciplinary design team to prepare and agree an Action Area Plan for the lands as required by the 2018-2024 Arklow LAP. Following an extensive and construction engagement process with Wicklow County Council, the AAP2 was approved by the Planning Authority on 11 July 2023. This approval established a shared vision and agreed



spatial framework for the coordinated development of the lands, including the phased delivery of residential development, open space, and transport infrastructure.

Parallel to the Action Area Plan process, the design team were also actively working on the preparation of a planning application for the development of the northern portion of the AAP2 lands (north of the SPAR). Extensive engagement was held with the Planning Authority to shape the development through the LRD process.

On 13 July 2023, a S247 Meeting was held with WCC presenting a draft outline of the proposed development. Comments and feedback from this meeting were considered and incorporated by the Design Team and a S32B Meeting was held on 9 February 2024. The LRD Opinion issued on 11 March 2024. The LRD planning application was then submitted on 26 July 2025, registered under Ref. 24/325 for development consisting of 476 no. residential units, a childcare facility, a neighbourhood centre and part of the Southern Port Access Route. Following a further information request and response, a decision to grant permission for development was issued on 11 December 2024 with the final grant then following on 21 January 2025.

Since the grant of permission, the project team has been progressing all necessary pre-commencement compliance submissions to ensure that construction can commence at the earliest possible opportunity. This includes successful agreement of the scheme naming under Condition 32 on 28 July 2025, a key enabling step for service and utility coordination. As soon as all pre-commencement conditions are discharged, our client intends to mobilise on site and begin construction.

It is also important to emphasise that the applicant intends to immediately progress the design and planning of Phase 2, comprising the lands to the south of the SPAR, once the Phase 1 compliance process is completed. This second phase is essential to the overall delivery strategy for the lands and is not simply an extension of the first phase. Phase 2 will complete and reinforce the planned neighbourhood by delivering additional homes, expanding and integrating open space and amenity networks, supporting the viability of the neighbourhood centre and childcare facility, and completing the SPAR.

For these reasons, it is essential that the subject lands are afforded an appropriate zoning designation that reflects their strategic importance and allows for uninterrupted development sequencing. Assigning these lands a Priority 2 designation would be counterproductive and would undermine both the coordinated delivery of housing and the timely completion of critical infrastructure identified within the LPF.

In light of the detailed history, the clear delivery trajectory already established, and the strategic importance of these lands in supporting compact growth, placemaking, active travel connectivity and the completion of the SPAR, we respectfully request that the southern portion of the subject lands be zoned Residential – Priority 1 under the Arklow LPF

5.2 Strategically Located Lands

The subject lands hold strategic importance due to the location and potential for alleviating Town Centre traffic and removing HGVs from the centre through the delivery of the SPAR. The SPAR will also help to realise the LTP's objective to provide a bus route through the SPAR and as such the entire SLO4 development could significantly contribute to the delivery of transit-oriented development principles.

5.3 Accessible, Serviced, Readily Available Lands

The subject lands possess the essential characteristics for immediate and sequential development, being highly accessible, serviced, and capable of efficient delivery within the plan period. The locational attributes and infrastructure context mean they represent one of the most development-ready strategic landbanks in the Arklow area.

Accessibility

The lands benefit from established and emerging access infrastructure. Presently, access is provided via the existing road and railway bridge connection from the Knockmore roundabout. In addition, the permitted Phase 1 development includes delivery of a section of the Southern Port Access Route, which





will further enhance access and connectivity. This road infrastructure forms part of a wider strategic transport objective for the town and will ultimately serve as a key movement corridor linking the port, the N19 and surrounding lands.

Crucially, the lands immediately north of the subject landbank, within SLO3, currently lack the necessary access arrangements to enable their development in the short to medium term. The Draft LPF itself acknowledges this dependency, stating that principal vehicular access to SLO3 is to be provided via the SLO4 lands (Tinahask Upper / Money Big). In effect, the delivery of the subject lands including the associated section of SPAR is a prerequisite to unlocking future development to the north.

The sequencing of development at this location is therefore entirely logical and consistent with good planning practice. Progressing the subject lands first ensures orderly expansion southward, provides the necessary access and service corridors for adjacent zoned lands, and avoids the creation of isolated or inaccessible development pockets. This approach aligns with principles of sequential growth and infrastructure-led planning as embedded in national, regional, and local policy.

Services

The subject lands also benefit from direct access to essential services. The permitted Phase 1 scheme includes delivery of all core utility infrastructure, including water, wastewater, surface water drainage, and utility networks, with capacity designed to facilitate future phases. As such, the subject lands can be readily serviced through existing and planned infrastructure already approved and established on adjoining lands.

This represents a significant advantage over other zoned lands in Arklow which either have limited serviceability, uncertain delivery timelines, or require substantial upfront investment before development can commence. The subject lands therefore offer a clear and efficient pathway to early delivery, with no reliance on speculative or future upgrades.

Readily Available

Taken together, the accessibility, servicing arrangements and approved enabling works demonstrate that the subject lands are immediately capable of development. Construction on Phase 1 is expected to commence shortly, and Phase 2 can follow seamlessly, ensuring continuity in delivery and maximising the efficiency of construction and service installation activities.

This development pipeline is unique in the context of Arklow, where there are limited locations with equivalent planning certainty, infrastructural readiness, and developer commitment. Designating the lands as Residential – Priority 1 will support uninterrupted delivery momentum and ensure that the LPF can meet its housing and infrastructure ambitions in a timely and sustainable manner.

The rezoning of the subject lands to Residential – Priority 1 is not only justified on the basis of accessibility and serviceability, but is also essential in meeting Arklow's mandated housing delivery targets and realising the strategic transport benefits associated with the SPAR.

By enabling both strategic housing delivery and the realisation of town-wide mobility benefits, the rezoning of these lands offers dual and mutually reinforcing public gains. It ensures that investment in transport infrastructure is aligned with development activity, maximises public value, and accelerates the transition toward a more compact, sustainable, and well-connected urban structure.

Accordingly, the rezoning of these lands to Residential – Priority 1 represents sound planning practice and is essential to securing the delivery of both housing and strategic transport infrastructure within the lifetime of the Arklow LPF.



6 Requested Amendments to SLO4 – Tinahask Upper – Money Little & Money Big

The SLO4 objectives in the Draft LPF are set out as follows:

SLO 4 Tinahask Upper, Money Little & Money Big Objectives

- The development of this SLO shall be contingent on the provision of new road infrastructure which required to be located on the SLO4 lands, namely (a) the improvement of the access road from the Knockmore roundabout to the railway line and the improvement of the railway overbridge, (b) a new distributor road from the railway overbridge into SLO4, and through SLO4 into SLO3 to the north and (c) the development of the western part of the future Southern Port Access Road located within the SLO4 area.
- Such road provision and improvements shall be subject to detailed design and phasing, based on the quantum of development that is planned to occur in each phase of the development, subject to the provision that no more than 250 dwellings may be occupied in SLO4 prior to
 - the improvement of the existing link road and railway bridge from the Knockmore roundabout leading into this area and
 - the full provision and operation of the new distributor road through this SLO which connects directly into SLO3 to the north.
- A minimum area of 4.5ha of Active Open Space (AOS) shall be laid out for active sports uses in a range of track, pitch and court types suitable for a variety of sports, including necessary car parking, lighting and changing facilities. In this regard:
 - The AOS north of the SPAR shall be developed and operational upon occupation of 50% of any residential development on the RN1 lands and prior to the occupation of any residential development on the RN2 lands north of the SPAR;
 - The AOS south of the SPAR shall be developed and operational upon occupation of 50% of any residential development on the RN2 lands south of the SPAR.
- Open Space shall be provided as part of residential developments in the area in accordance with County Development Plan standards and laid out as informal parks and walks. Within these areas, at least 3 equipped children's play areas measuring at least 0.2ha each shall be provided in tandem with residential development; one to the north of the SPAR and two to the south. These play spaces shall be in the form of a playground and/or MUGA (Multi Use Games Area) and should cater for a variety of age groups including teenagers.
- A minimum of 4ha shall be reserved for the provision of schools (CE Community and Education Zone). No more than 250 dwellings may be occupied in this SLO until the CE lands have been transferred to the relevant authorities or otherwise made available for the provision of a school.
- Local shops and services (LSS zone), to service both the future resident and working population of the SLO area, of a scale that is commensurate with the needs of the future population shall be provided. This local centre shall comprise of:
 - a small group of shops including 1 medium size foodstore / general grocery store (not a supermarket), and
 - other such retail and non-retail services as shall be determined as warranted following the carrying out of a Retail Impact Assessment.
 - this local shops and services zone shall be permitted, constructed and operational, prior to the occupation of the final 25% of any residential development on the RN1 lands and prior to the commencement of any development south of the SPAR.
- 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 150 units), each containing materially different house designs within an overall unified theme.
- 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.

Comment

The SLO4 objectives contained within the Draft LPF are comprehensive and reflect the intended sequencing of infrastructure and development across these lands. In principle, our client is broadly supportive of the stated objectives, as they align with the overall vision for a coordinated, infrastructure-led approach to development within this strategic growth area.

We note that the majority of the Draft LPF SLO4 provisions are consistent with the framework previously agreed through the Action Area Plan (AAP2) and subsequently reinforced through the grant of permission for the initial phase of development on the northern portion of the site. This planning history which includes a fully approved and live permission provides a clear and robust delivery structure, including phasing, infrastructure commitments, and community and amenity provision.

However, in order to ensure consistency, certainty and alignment with the already approved delivery programme, we respectfully request that the Draft LPF wording for SLO4 be refined so that it directly reflects the phasing requirements established under both the approved AAP2 and the conditions attached to the permitted LRD scheme. Maintaining this alignment is essential to avoid conflicting or duplicative triggers and to ensure that development can proceed in an orderly and timely manner in accordance with commitments already agreed with the Planning Authority.

In this regard, we specifically highlight the following key phasing conditions attached to the permitted development:

- Condition No. 12:

No more than 400 dwellings may be occupied until the upgrade of the existing railway bridge has been completed to the satisfaction of the Planning Authority, unless otherwise agreed in writing.

- Condition No. 13:

No more than 50% of residential units may be occupied until the Community & Education (CE) lands have been transferred or otherwise made available for school provision.

These conditions directly reflect the AAP2 phasing strategy and are fundamental delivery triggers already accepted and endorsed through the statutory planning process. As such, we request that they be mirrored in the adopted SLO4 objectives to ensure consistency and avoid unnecessary duplication or contradiction between policy and an existing planning permission.

The permitted AAP2 sets out a clear, infrastructure-first sequencing of development north of the SPAR (Phase 1) and south of the SPAR (Phase 2), including triggers for:

- delivery of the SPAR (as part of Phase 2) and distributor road network (as part of both Phase 1 and Phase 2)
- upgrade of the railway bridge (no more than 400 units to be occupied in advance of upgrade)
- phased provision of active and passive open space (both Phases)
- timely delivery of childcare and community facilities (as part of Phase 1)
- transfer of CE lands (as part of Phase 1)
- structured delivery of the neighbourhood centre and retail services (as part of Phase 1)

This AAP2 and associated LRD approval represent the most detailed and up-to-date technical and design assessment of the lands, prepared in close consultation with the Planning Authority and approved through both plan-led and project-led processes. Importantly, they also represent the most advanced and realistic delivery pathway for this strategic expansion area of Arklow.

We therefore request that the LPF adopt a wording approach that:

- confirms the primacy of the approved AAP2 phasing strategy and LRD conditions, and
- provides flexibility to ensure that development proceeds in accordance with agreed and permission-based triggers where already established.

This approach will ensure coherence between the adopted plan and live permissions, support an orderly and infrastructure-led development sequence, and avoid any potential regulatory ambiguity that may delay delivery of new homes and critical transport infrastructure including the Southern Port Access Route.

In conclusion, while the intent of the Draft SLO4 objectives is supported, the adopted wording must ensure alignment with the existing, approved and deliverable development framework. We therefore



request that the Draft LPF is amended to confirm that phasing and delivery triggers within SLO4 will be consistent with, and not override or conflict with, the approved AAP2 and relevant planning conditions.





7 Conclusion

Having reviewed the content of this submission, the Planning Authority is now formally requested to give full consideration to the strategic importance of the subject lands at Tinahask Upper, Money Little, and Money Big (SLO4) in the context of the Draft Arklow Local Planning Framework (LPF) 2025 and to make the necessary amendments to the Draft LPF prior to its final adoption.

The evidence presented throughout this submission demonstrates that these lands represent a critical and deliverable component of Arklow's future growth strategy. They are fully serviced, accessible, and immediately available for development, forming an integral part of the approved Action Area Plan 2 (AAP2) and the permitted Phase 1 Large-Scale Residential Development (Reg. Ref. 24/325) on the adjoining northern lands.

Reclassifying the southern portion of the SLO4 lands from 'RN2 – New Residential Priority 2' to 'RN1 – New Residential Priority 1' is both a logical and essential amendment to ensure the sequential, infrastructure-led development of this strategic area. Such rezoning will enable:

- The timely delivery of the Southern Port Access Road, which is a critical short-to-medium term objective of both the LPF and the Local Transport Plan, providing significant traffic relief for Arklow town centre and improving regional connectivity;
- The orderly progression of residential development, ensuring that much-needed housing can be delivered within the lifetime of the LPF to meet national and regional housing targets set out in the NPF, RSES, and County Development Plan;
- The coordinated delivery of supporting community and social infrastructure, including active open space, educational facilities, and local services, consistent with the principles of compact growth and sustainable neighbourhood design.

Failure to rezone the subject lands risks creating a planning and infrastructure bottleneck whereby the SPAR, despite being identified as a high-priority project, could not be delivered within the plan period due to the restrictive RN2 designation. This would, in turn, delay both critical infrastructure delivery and housing supply, contrary to the stated aims of the Draft LPF and wider regional policy frameworks.

Accordingly, we respectfully request that Wicklow County Council amend the Draft LPF zoning map as follows:

To illustrate the subject lands at Tinahask Upper (SLO4) rezoned from zoning objective RN2 – New Residential Priority 2 to zoning objective RN1 – New Residential Priority 1.

Reason: *In the interests of proper planning and sustainable development, to facilitate the delivery of the Southern Port Access Road, provide for immediate residential development, and enable the achievement of Arklow's housing growth targets in a coordinated, infrastructure-led manner consistent with the NPF, RSES, and the approved AAP2 framework.*

Our client remains committed to working collaboratively with the Council to bring forward a high-quality, well-planned residential and infrastructural development that will make a meaningful contribution to the sustainable growth and vitality of Arklow.

