



Arklow Local Area Plan Submission - Report

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Reference:	ARKLAP-150104
Submission Made	March 28, 2024 4:42 PM

Topic

Compact Growth - Housing – Population Growth

Submission

Please refer to submission attached.

Topic

Infrastructure - Sustainable Movement – Transportation

Submission

Please refer to submission attached.

Topic

Other topics for you to have your say on! - Environmental Assessment - Plan Implementation -Plan Delivery

Submission

Please refer to submission attached.

File

Lands at Tinahask Upper - Pre-Draft Arklow LAP Submission.pdf, 1.06MB

Draft Local Area Plan Submission – Issues Paper Stage



On behalf of

Tom & Pat Redmond

March 2024



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1 Introduction

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin have been instructed by our client, **Tom & Pat Redmond**, [REDACTED] **Gorey, Co. Wexford**, to make this submission in response to the notification by Wicklow County Council of its intention to prepare the Draft Arklow and Environs Local Area Plan.

We note the relevant submission date is **2nd April 2024** in this case and this Submission is lodged within that timeframe.

On 1st March 2024 Wicklow County Council (WCC) commenced a review of the current Arklow Town and Environs Local Area Plan 2018-2024 and preparation of a new Arklow and Environs Local Area Plan (LAP). Our client welcomes the opportunity to provide a submission on this review and to engage on the future direction of the Town and we trust our input will be considered during the formulation of the new Plan and future development of Arklow.

Whilst we acknowledge that at this stage of the process, it is not possible to consider matters relating to zoning and specific policy objectives, this submission is simply requesting the Council to consider the optimal, sustainable uses of these strategically located lands within our clients ownership in Arklow and to consider the optimal, sustainable uses of their lands and to take this into account in terms of the National Policy mandate relating to the delivery of housing units.

Our client welcomes the opportunity to provide a submission on the Pre-Draft LAP and looks forward to future engagement with the Planning Authority throughout the plan making process.

1.1 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.

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 including the subject lands in Arklow, outlined below.

Our client is currently progressing a Large-Scale Residential Development (LRD) application for the northern portion of the subject lands and has recently completed a pre-planning planning meeting with Wicklow County Council under Section 32D of the Planning & Development Act, 2000 (as amended) and received an Opinion on 11th March 2024 under Ref. LRD PP23/129.

1.2 Client's Landholding

This submission, in respect of the Pre-Draft Issues Paper for the Arklow and Environs LAP 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 c. 38.58 ha. The lands are bound to the north by AAP1, 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 1 – 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. Further details on the Action Area Plan are detailed below.



Figure 2 – AAP1 and AAP2 lands outlined with our client's ownership denoted in Red





2 Statutory Planning Context

2.1 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 2.85 million people, at least half a million more than today. It is identified that progressing the sustainable development of new development on infill and brownfield sites for housing and particularly those close to public transport corridors is key to enabling growth such as the site at Mariner’s Point.

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 document goes onto state the following in relation to infill and brownfield development:

*“The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas. **This is applicable to all scales of settlement, from the largest city, to the smallest village.**”*

National Policy Objective 72a – *“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.”*

National Policy Objective 72b – *“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.”*

The National Planning Framework signals a shift in Government policy towards **securing more compact and sustainable urban development, which requires at least half of new homes within Ireland’s cities to be provided within the existing urban envelope.**

The subject site, is a greenfield, infill site within the settlement boundary of Arklow surrounded by existing and future residential development and is consistent with the policies and intentions of the National Planning Framework.

2.2 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)* contains a specific objective (RPO 4.3) which sets out the following in relation to **Consolidating and Re-Intensification:**

*“RPO 4.3: Support **the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs** and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”*

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.

In order to achieve ‘compact smart growth’, Arklow has been designated within the RSES for the preparation of a Local Transport Plan (LTP) which shall include transport priorities in terms of public transport infrastructure and services, cycle investments, improvements to the pedestrian environment and road enhancements. We ask that the Planning Authority take into account this requirement and prepare a Local Transport Plan to inform and form part of the policies and objectives of the Draft Arklow and Environs LAP.





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 a 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 next stage of the Local Area Plan process 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; and set out in the Plan and that the zoning of well placed, infill/brownfield lands in close proximity to public transport services is identified in the next stage of the plan making process.

2.3 Wicklow County Development Plan 2022-2028

Under the Wicklow County Development Plan 2022-2028, there have been no zoning changes made to lands within the Arklow Area.

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 3 – Wicklow Settlement / Aggregate Settlement Population Targets 2016 – Q2 2028





As identified above the population is set to increase by 2193 people from 2016 -2028. The plan notes the infrastructure deficiencies in Arklow and Blessington, both of which were targeted for significant growth.

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, no commencement notices have been lodged in the whole of Arklow.

Therefore, as it stands, c. 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. The Arklow LAP came into force in March 2018 and has a 6 year life until March 2024. Under the Core Strategy targets, Arklow is expected to deliver c. 240 units from the commencement of the new County Development Plan in 2022 to the end of the current LAP in March next year. 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 790 units in Arklow it is considered appropriate that this site is brought forward. 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.

2.4 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.

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.”

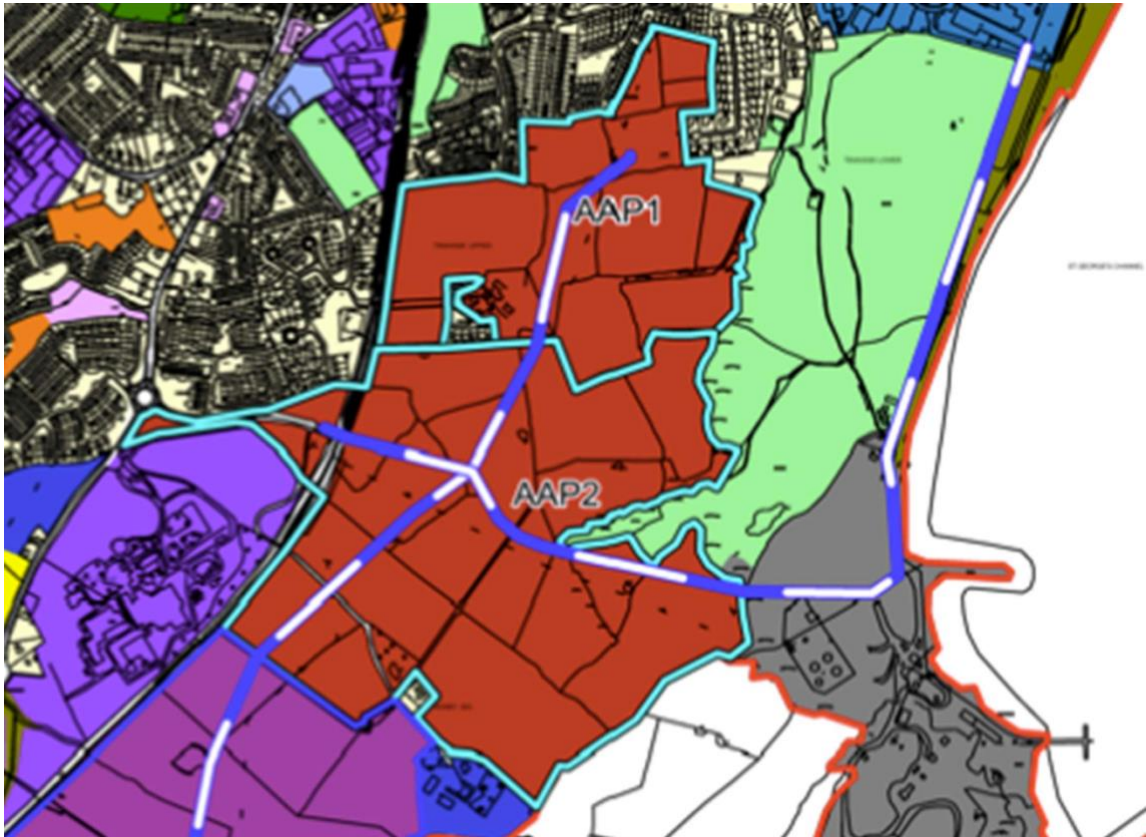


Figure 5 – Existing Zoning Map within Arklow and Environs LAP 2018-2024

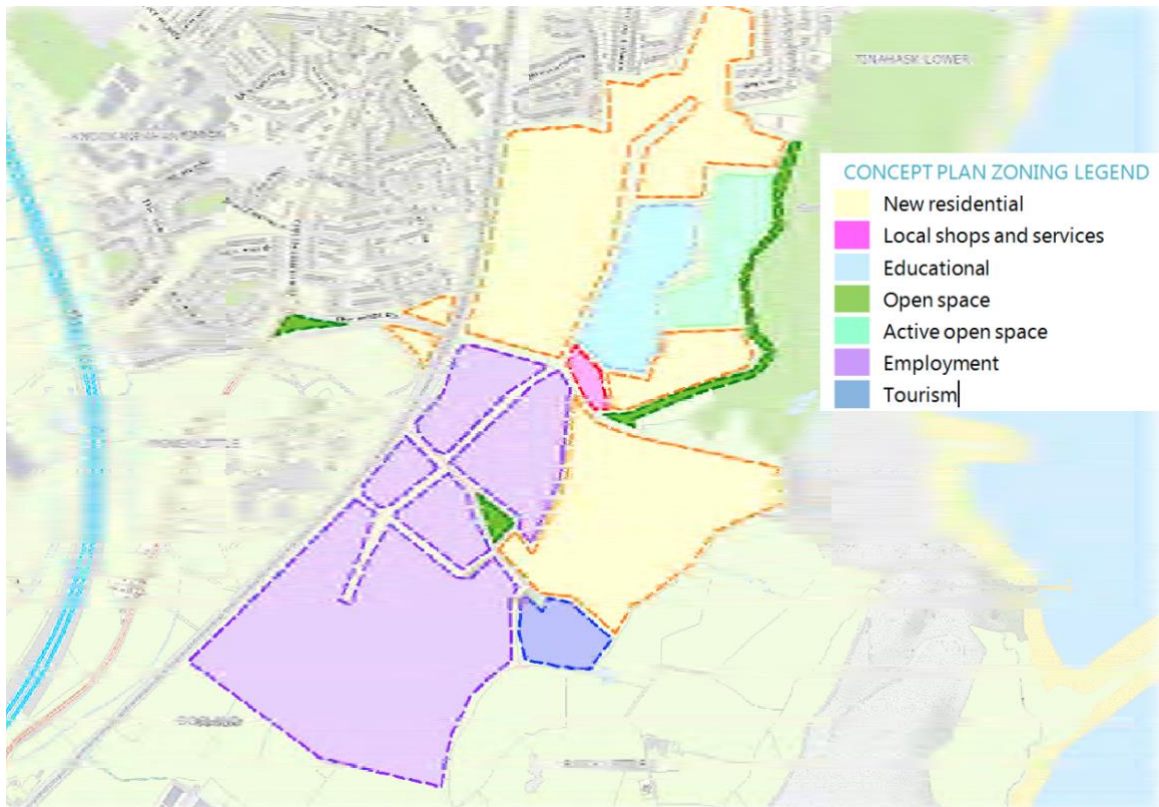


Figure 6 – AAP1 & AAP2 Concept Plan





3 Submission

Our client looks forward to a new LAP for Arklow and its Environs that follows best practice Guidelines, takes full account of current strategic planning policy and generally promotes the sustainable development of the town, so that it can fulfil its ambitious role in the overall County hierarchy.

We have taken the opportunity to respond to themes highlighted in the Council’s Issues Paper, as follows:

3.1 Theme 1: Housing – Population – Compact Growth

As noted in the Issues Paper, Arklow will need c. 1,221 new homes to be built between now and 2031. To facilitate compact growth, 30% of new homes need to be in the existing built-up area and town / village centres. Wicklow County Council are required to identify and reserve an appropriate amount of land in the best locations to meet this housing target. These homes must be provided for in a sustainable manner, aligning with the provisions of the Core Strategy of the County Development Plan, and having regard to established and sustainable settlement patterns and the natural environment.

Where should higher densities be located? How do we deliver higher densities?

RECOMMENDATION: We note the lack of an urban bus service within Arklow and the fact that the existing public transport services within Arklow are not high-frequency services and therefore, under the provisions of the County Development Plan and the Sustainable Residential and Compact Settlement Guidelines, suitably intense residential development shall be brought forwards on the most suitably located sites in the Arklow area.

The subject lands are located c. 2 km south of Arklow’s Main Street. The closest bus stop, on Wexford Road is located 550 m (8 – minute walk) from the subject site entrance. This stop is serviced by Bus route no. 2 (Wexford – Dublin Airport) and route no. 740A (Wexford – Dublin City & Airport) each operating at an hourly frequency.

These distances to public transport stops fall outside of the scope for the requirement of a minimum of 50 units per hectare density. Therefore, under the County Development Plan, the subject lands are classed as an ‘Outer Suburban / Greenfield Site: Minimum density of 35-50 dwellings per hectare.’

We ask the Planning Authority to contain appropriate policies and objectives to ensure that future residential development strikes a balance between respecting the surrounding environment while ensuring that it is suitably intense in line with the existing locational attributes to high-capacity public transportation.

Where should we deliver our new housing without contributing to urban sprawl?

RECOMMENDATION: To achieve the housing and population growth targets in the County Development Plan Q2 2028 of 790 units in Arklow and the Pre-Draft Issues Paper target of 1,221 homes by 2031, it is considered appropriate that the subject lands are the most appropriate location for the development of a significant quantum of new housing.

Having regard to the ‘sequential approach’, the subject site is readily available, deliverable, serviceable and most importantly our client is willing to and has a proven track record of implementing received grants of permission.

Further, it is noted that any future development on the subject lands will provide a direct road network and access into AAP1 lands which are located closer to Arklow Town. Albeit, there is currently no access point available from the existing built up area to the AAP1 lands. Therefore, development on AAP1 lands cannot commence until the principle vehicular access is provided through the ‘Port Access Road’ as part of the objectives of the AAP2 lands.

The subject lands are immediately adjacent to and contiguous with the existing built up area of Arklow and will enable the extension out and from the town centre in line with sequential approach principles. The proposed development and phasing strategy will develop outwards from the town centre with these lands being the closest greenfield lands to the centre and public transport routes.





It is therefore considered that the subject lands can deliver quality residential development on a serviced / serviceable site in accordance with the ‘sequential approach’ extending outwards from the town centre core area developing the closest greenfield lands and would ensure a cohesive and efficient use of the lands. There is a clear opportunity for efficient and suitably intense housing to be brought forward on this site which will ultimately form part of a much wider existing residential offering forming a natural extension of Arklow Town.

3.2 Theme 5: Infrastructure – Sustainable Movement – Transportation

The Issues Paper highlights that the provision of adequate infrastructure is critical to facilitate and sustain growth. It acknowledges that Arklow has a range of strategic transport infrastructure including the port. The continued improvement of the local transportation network, including the provision of footpaths, cycle lanes, traffic management proposals, etc. are important consideration for incorporation into the Plan.

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

RECOMMENDATION: As noted above in relation to Theme 1, to allow for compact urban growth and higher density forms of development, the introduction of a high-frequency urban bus service and an increase in bus stops is required in Arklow Town.

We ask that the Planning Authority take into account the requirement of the RSES and prepare a Local Transport Plan to inform and form part of the policies and objectives of the Draft Arklow and Environs LAP.

We recommend that the Draft LAP includes policies and objectives to deliver compact growth and higher density residential development alongside new road and public transport infrastructure.

3.3 Theme 6: Other Issues

Area Action Plan 2

The subject lands at Tinahask Upper, are included within the Action Area Plan 2 Boundary, which has been approved by Wicklow County Council on. We ask that Wicklow County Council take into account the provisions of the approved Action Area Plan and incorporate into the forthcoming Arklow and Environs Local Area Plan.

We direct the attention to several changes relating to zoning and Port Access Road as approved. Further, the Arklow and Environs LAP 2018-2024 states the following on page 57:

“Action Area Plans are zoned ‘MU’ Mixed Use in the Land Use Map and the position, location and size of the land use zoning shown on the concept maps in the written statement are indicative only and may altered in light of eventual road and service layouts, detailed design and topography, subject to compliance with the criteria set out for the Action Area Plans.”

Having considered the above provision, we note that at the preliminary design stage of the process, changes were made to the original zoning on the subject site to provide a more viable route for the Port Access Road through the AAP2 lands, along with minor changes to the Residential and Open Space zonings that allow for the development potential on the lands to be maximised. The minor changes to the relief road route and zoning on the site was driven by the site topography and other minor constraints.

The previous zoning of the site and zoning changes submitted in the Area Action Plan approved by Wicklow County Council on 11th July 2023 are shown below:



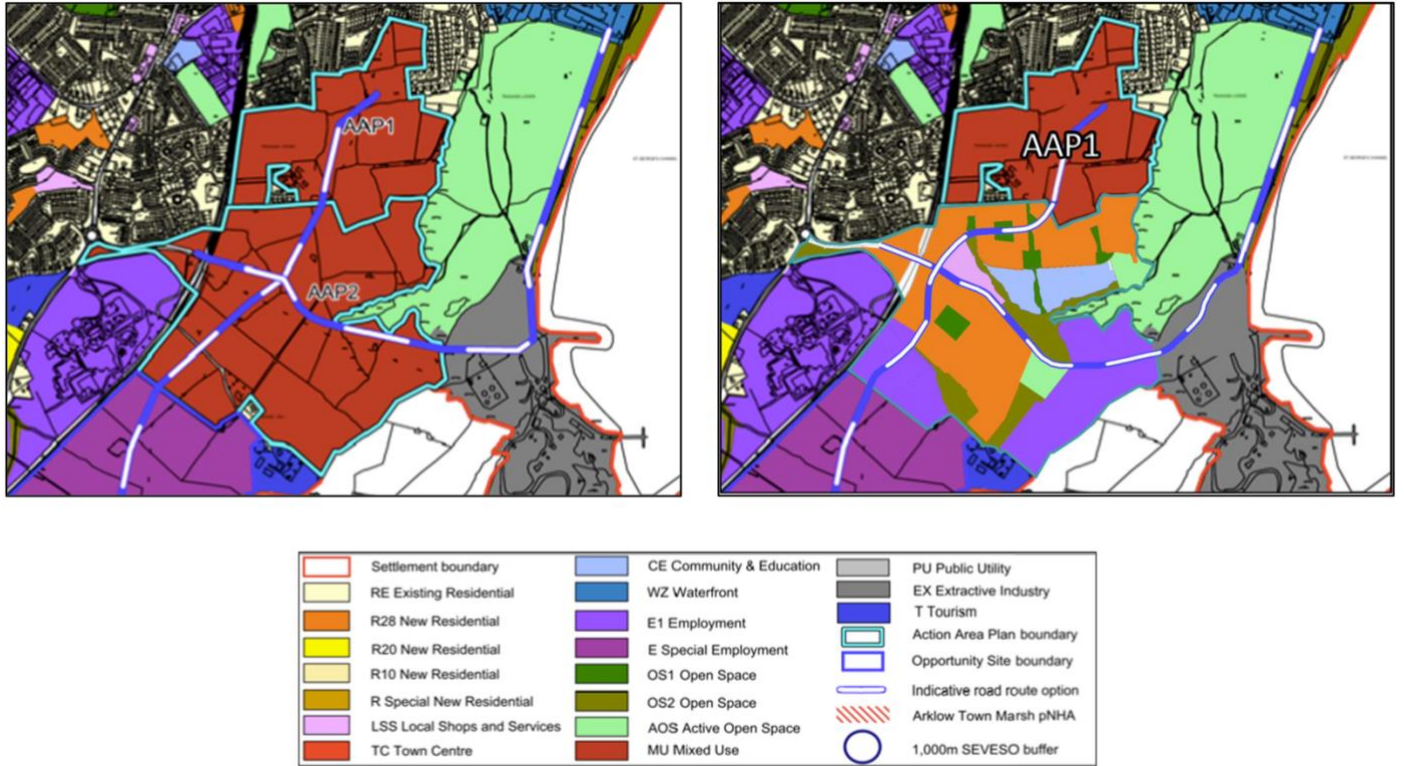


Figure 7 – Existing and Approved AAP Zoning Map

We ask that the forthcoming Draft Arklow Town and Environs Local Area Plan 2024 is fully aligned with the provisions and land use zoning of the approved Area Action Plan which contain minor adjustments and further details on the Action Area Plan 2 objectives. The adjustments do not contradict or preclude development occurring in the manner envisaged by the Local Area Plan or Development Plan and allows for the orderly development of the lands in a phased and integrated manner as approved by Wicklow County Council on 11th July 2023.



4 Conclusion

Our client welcomes the publication of the Pre-Draft Public Consultation Issues Paper for the Arklow Town and Environs Local Area Plan and the opportunity to comment on the future development of Arklow.

Our client emphasises their availability to meet Wicklow County Council to discuss any issues arising in the foregoing relating to their subject lands.

We trust that the matters outlined above will be taken into consideration as part of the preparation of the Draft Arklow Town and Environs Local Area Plan.

We confirm we act for **Tom & Pat Redmond** and request that all future correspondence in relation to this matter be directed to this office.

