



Who are you:	Agent
Name:	P&B Bermingham
Reference:	ARKLPF-201930
Submission Made	November 11, 2025 8:26 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

Local Planning Framework PART B Settlement Specific Objectives.

- B.3 Housing Development
- B.9 Zoning & Land Use

Maps:

- Land Use Map

- Key Green Infrastructure Map

Appendices:

- Green Infrastructure Audit

Maps:

Please find attached a submission on behalf of P&B Bermingham in relation to lands at Vale Road, Yardlands Td., Arklow

Upload a File (optional)

Vale Road, Yardlands LAP Submission - Final.pdf, 6.09MB

Variation No 5
Administrative Officer
Planning Section
Wicklow Co. Council
Station Road
Wicklow Town

Date: 10.11.2025

Variation No. 5 to the County Development Plan 2022-2028

Arklow Local Planning Framework

Re: Lands at Vale Road, Yardland Td., Arklow, Co. Wicklow

A Chara,

In relation to the above, we have been engaged by the landowners, P&B Bermingham [REDACTED]
[REDACTED] to prepare a submission on the preparation of the Draft Local Area Plan for Arklow and in particular
lands at Vale Road, Yardland Td., Arklow, Co. Wicklow.

1. Introduction

Under the 2018-2024 Arklow Local Area Plan, the subject lands are presently zoned "R28 New Residential",
which allows for new residential development with no restrictions.

The draft Arklow Local Planning framework now proposes that these lands be rezoned as "RN2" where it
stipulates that permission will only be considered when *"At least 75% of Priority 1 new residential lands (RN1)
have been activated (i.e. consent obtained and development initiated)"*

and "OS2", Natural Areas, to protect and enhance existing open, undeveloped lands.

There has been a serious lack of residential development in Arklow over the past 15 years while awaiting the construction of the new Waste Water Treatment Plant and now it is proposed to further restrict development on this ready to go serviced site within the town which goes against the current housing need and demand at both a national and local level.

As a result, **the landowner requests that these lands are now all zoned as RN(1)** which is in keeping with the existing zoning and permits a flexible and positive approach to securing permission for new residential homes within the built-up environment of the town with development achievable within the lifetime of this plan.

It should be noted that the majority of lands zoned for RN(1) are confined to 2 large un-serviced sites that require extensive infrastructure works to provide roads and provision of water and foul services and there is no guarantee these can be delivered during the lifetime of this plan.

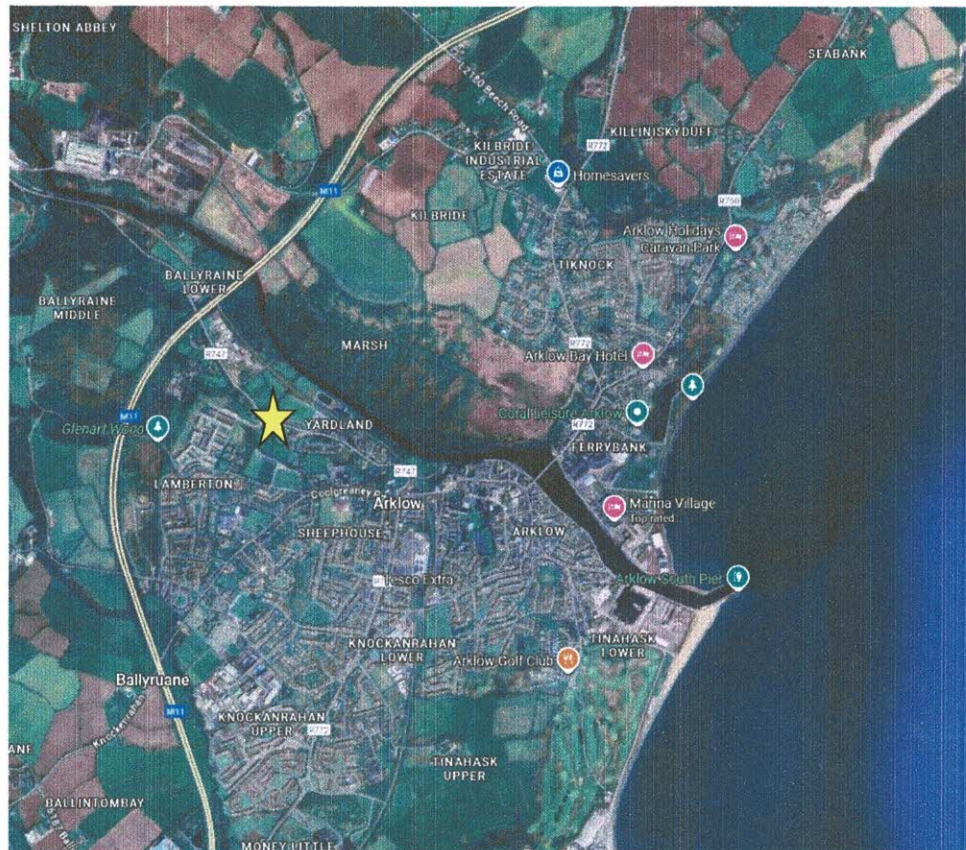
This submission will now set out the reasons and justification for the lands to be zoned “RN(1)”

2. Site Location

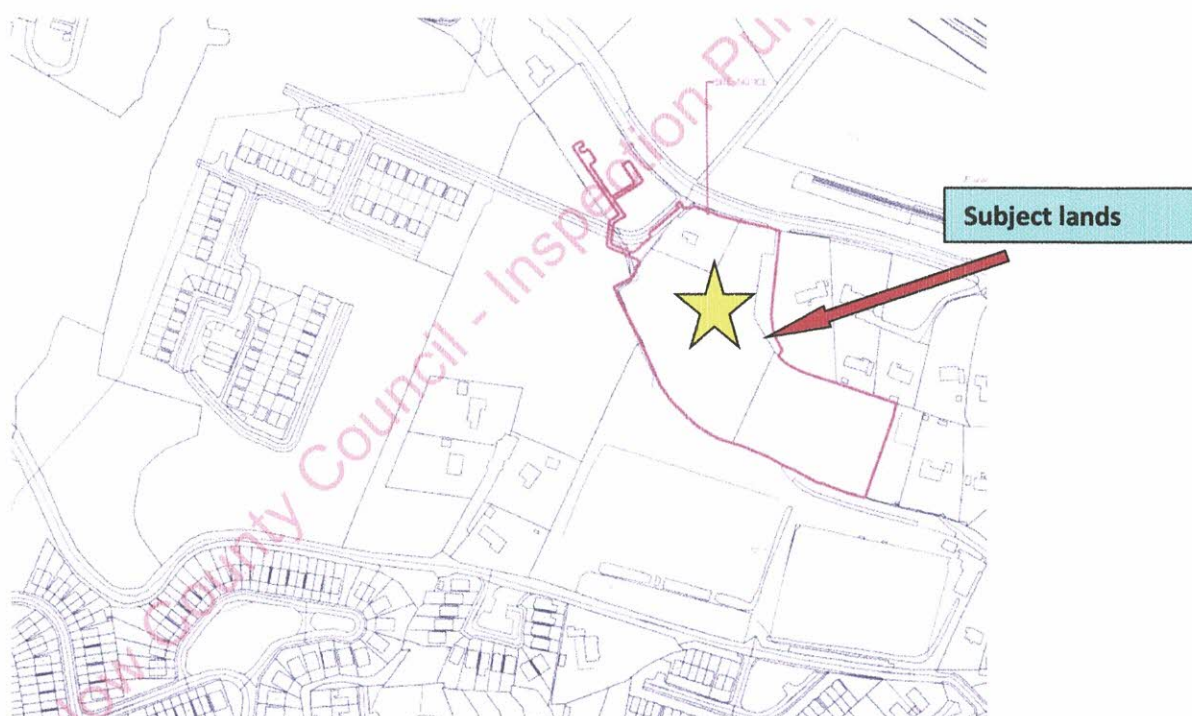
The 1.99-hectare greenfield site is located to the west of the town at Vale Road, Yardland Td., Arklow.

The site borders the Vale road to the north, residential houses to the east, sports fields to the south and the new Heatherside residential development to the west. It is currently zoned “R28 New Residential” under the 2018-2024 Arklow Local Area Plan with direct road access and mains services connection from Heatherside estate in place.

It is close to the church, schools and local shops and development with completion is achievable within the lifetime of the plan.



Site Location (Google Maps)



Subject Site @ Vale Road, Yardland Td., Arklow

3. Planning & Zoning History

The lands have been the subject to the following planning applications over the past 20 years.

PRR: 07/610038

Permission was **Granted** for 42 houses on the subject site. The economic downturn at that time prevented the development commencing.

PRR: 12/610005

Time Extension was **Granted** for 42 houses on the subject site. The wait for a new waste water treatment plant prevented the development commencing.

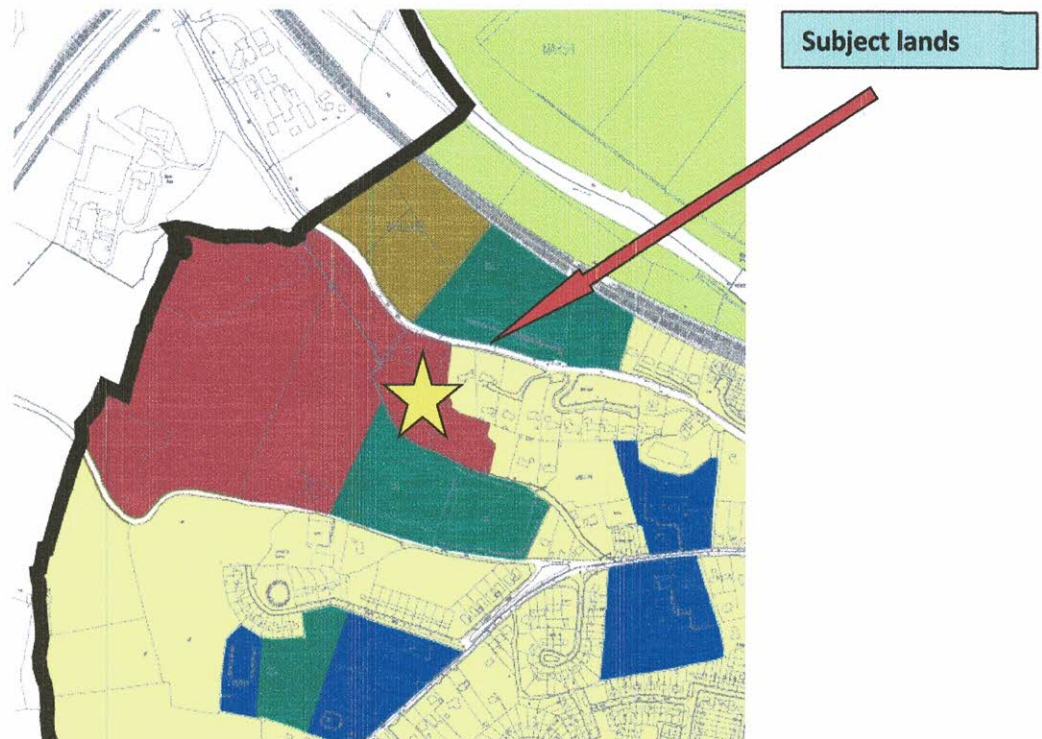
PRR: 22/1387 -

Permission was **Refused** for 49 houses on the subject site. It must be noted that the refusal reasons related to waste water connection and the failure by the applicant to fully address the further information request. The commissioning of the Waste Water Treatment Plant and a new design proposal for the site can overcome all the refusal reasons. With the treatment plant only being commissioned in 2025, Heatherside estate is to now connect to the mains foul line and the subject site will connect to same.

It should be noted that in previous local area plans, the subject site has always been zoned residential with no restrictions in place. As a result, it makes no sense to now freeze development on the site at a time when more housing is required.

Arklow Town Development 2005-2011

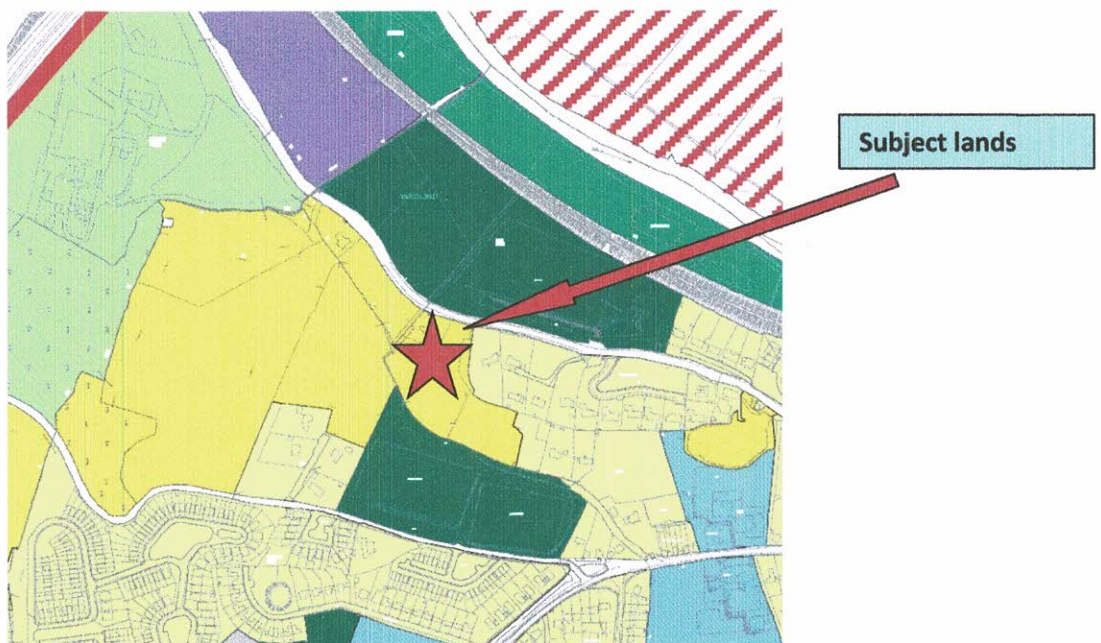
Under the 2005 – 2011 Arklow town development plan, the subject site was zoned “RB, New Residential “



2005-2011 land use zoning map

Arklow Environs Local Area Plan 2011-2017

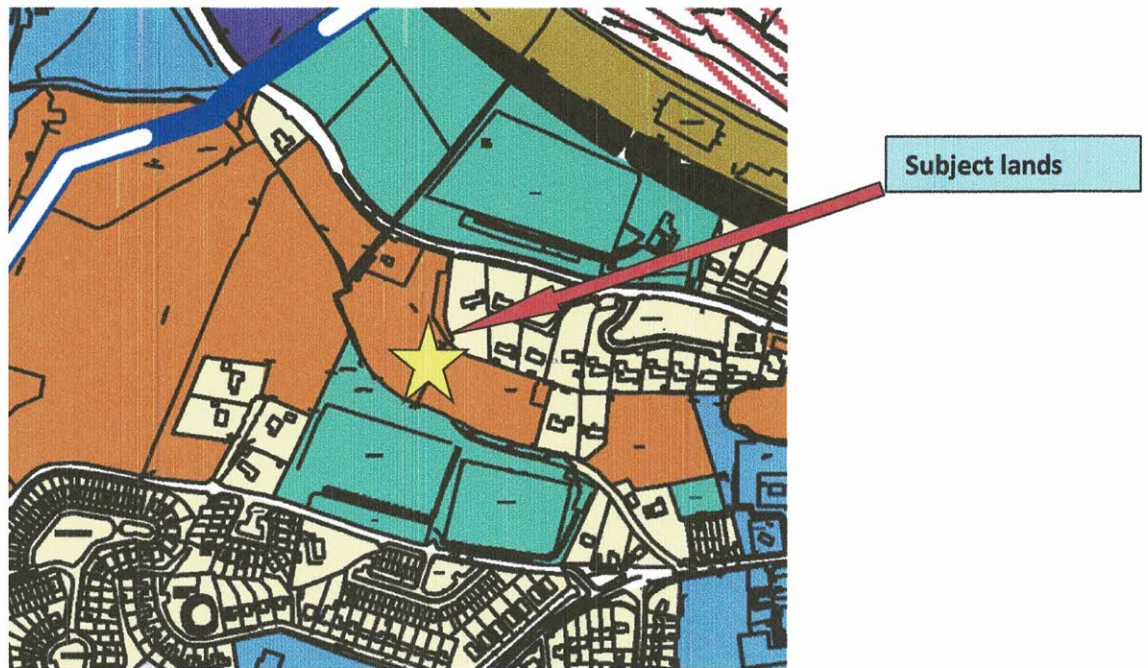
Under the 2011 – 2017 environs local area plan, the subject site was zoned “ New Residential “, to provide for new residential development



2011-2017 land use zoning map

Arklow Environs Local Area Plan 2018-2024

Under the 2018 – 2024 environs local area plan, the subject site was zoned “R28, New Residential “, to provide for new residential development at a density up to 28 units/ha.



2018-2024 land use zoning map

Arklow Environs Local Area Plan 2025-2028

Under the 2025 – 2028 environs local area framework, it is proposed to split the subject site into two separate land use zones,

1. **RN(2), New Residential**, to provide for new residential development after

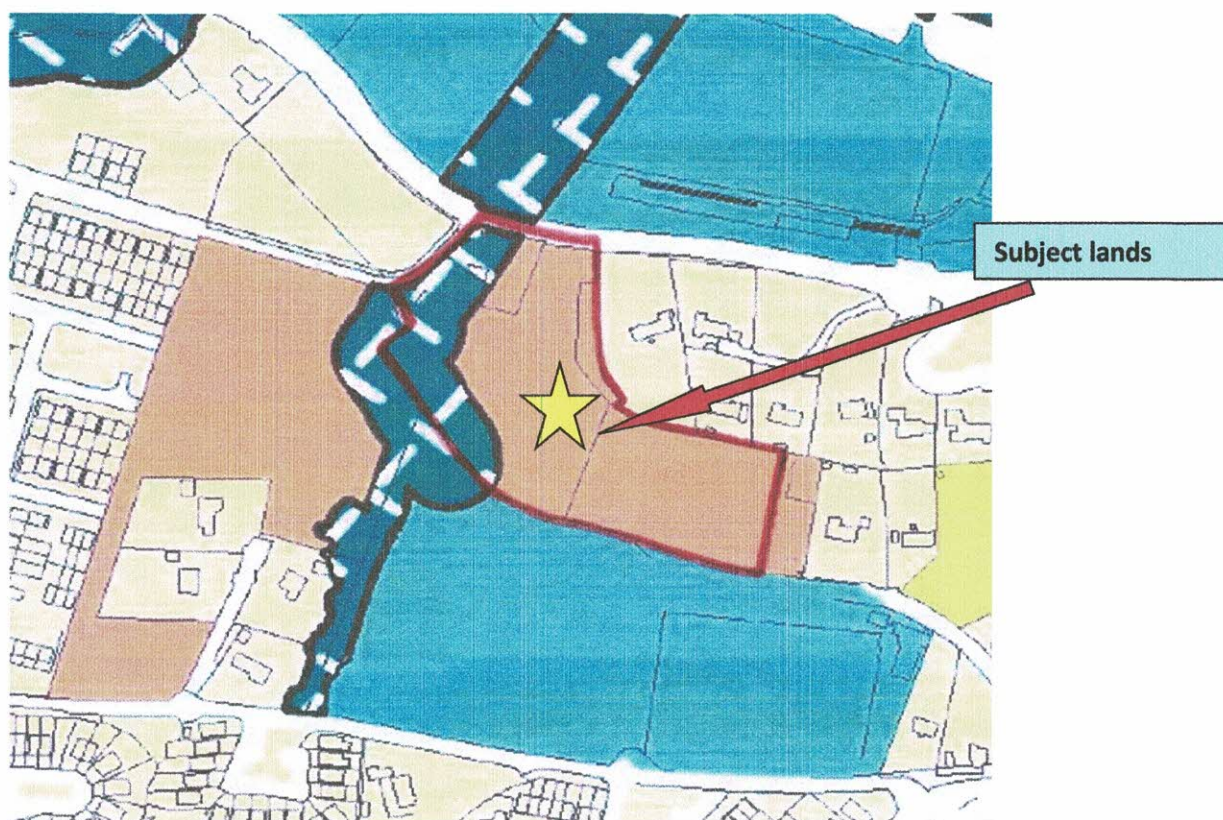
“At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated)”

2. **OS2, Natural Areas**, to protect and enhance existing open, undeveloped lands.

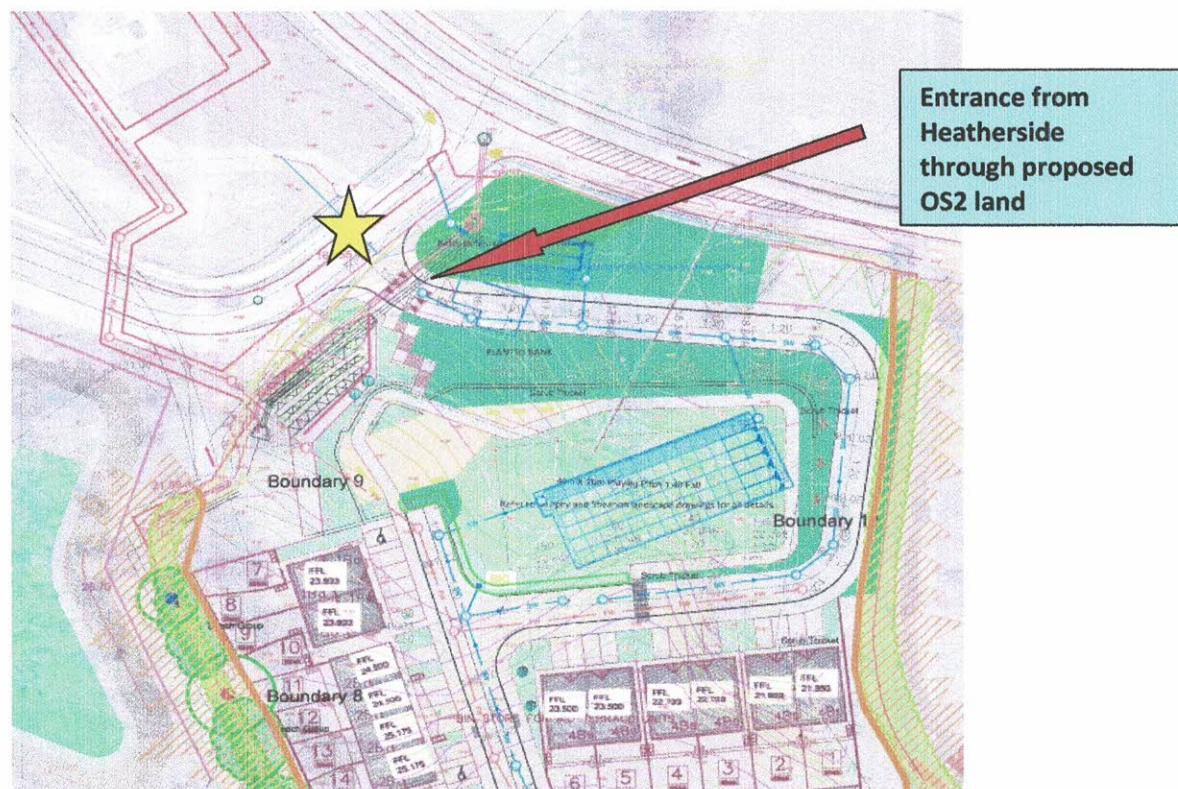
In relation to the proposed land use zoning for OS2 Natural Areas, please note the following:

- By rezoning this section of land, it is eliminating an agreed access onto Heatherside estate and forcing the site to open another entrance onto the Vale Road which will impact traffic safety.
- One existing entrance serving Heatherside and the subject lands reflects proper planning & development of this site particularly in view of improving road safety and reducing traffic hazards. (Refer to PRR22/1387)

- It will reduce the housing density at a time when Government policy is to increase densities on zoned serviced lands.



Draft Zoning @ Vale Road, Yardland Td. Arklow



PRR: 22/1387 Site Layout plan entrance

4. National Planning Policy

The National Planning Framework (NPF)

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.

Under Section 6.6 of the NPF a core principle to guide the delivery of future housing states,

"Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure"

It states under section 10 that, *"The tiered approach to zoning will continue to differentiate between zoned land that is available for development and zoned land that requires significant further investment in services for infrastructure for development to be realised."*

The National Policy objective 101 states,

"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."

- The subject site is zoned and serviced and is not reliant on new or upgraded infrastructure.

The National Policy objective 102 states,

"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 Policy objective 103 states,

"When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development."

- The majority of lands zoned RN1 located at SLO4 & SLO5 are wholly reliant on Irish Water to deliver new water and waste connections.
- Our client's site is fully serviced with direct road access from Heatherside estate and ready to go should permission be approved.

NPF Implementation: Housing Growth Requirements

The purpose of the Housing Growth Requirements issued in July 2025 states,

"Further to the approval of the Revised National Planning Framework (NPF) in April 2025, there is now a need for development plans to be updated to reflect the requirements of the NPF in respect of housing."

Policy and objective 2 states that,

"It is a policy and objective of these Guidelines that 'additional provision' of up to 50% over and above the housing growth requirement for each local authority set out in Appendix 1 is reflected within the relevant City or County Development Plan, subject to consistency with the policies and objectives of the National Planning Framework"

			2025 to 2034	2035 to 2040
Local Authority	Existing Annual 2020 Housing Requirement (Housing Supply Target)	Adopted Development Plan - Annual Housing Requirement (Housing Supply Target)	New Annual New Housing Growth Requirement to 2034	New Annual New Housing Growth Requirement 2035 to 2040
Carlow County Council	406	518	518	507
Cavan County Council	479	666	666	599
Clare County Council	550	960	985	687
Cork City Council	2,032	2,706	2,706	2,539
Cork County Council	2,437	3,769	3,837	3,045
Donegal County Council	965	1,280	1,283	1,206
Dublin City Council	4,861	8,196	8,196	6,075
Dun Laoghaire Rathdown	1,908	3,085	3,585	2,384
Fingal County Council	1,717	2,738	3,153	2,146
Galway City Council	754	739	790	942
Galway County Council	1,831	1,790	2,008	2,288
Kerry County Council	690	1,167	1,167	862
Kildare County Council	1,535	1,524	2,755	1,918
Kilkenny County Council	618	775	948	772
Laois County Council	468	666	1,244	585
Leitrim County Council	124	201	201	155
Limerick City & County Council	2,193	2,599	2,599	2,740
Longford County Council	333	428	428	416
Louth County Council	956	1,380	1,677	1,195
Mayo County Council	501	542	1,111	626
Meath County Council	1,090	2,826	2,942	1,362
Monaghan County Council	306	330	751	382
Offaly County Council	439	663	891	549
Roscommon County Council	285	392	392	356
Sligo County Council	468	672	672	585
South Dublin County Council	1,932	2,596	3,270	2,414
Tipperary County Council	605	1,008	1,008	756
Waterford City & County Council	705	804	1,144	881
Westmeath County Council	548	983	983	685
Wexford County Council	578	1,072	1,622	722
Wicklow County Council	745	1,411	2,068	931
Total	33,059	48,484	55,598	41,312

Appendix 1 NPF Housing Growth Requirements issued in July 2025

The above 2025 figures show an increase of nearly 50% on 2020 data on which the 2022-2028 county development plan core strategy was based so it is imperative that the Arklow Local Area Framework allows for no restrictions between RN1 & RN2 lands especially when the majority of proposed RN1 lands are on un-serviced lands.

5. Housing for All

Under the Government's Housing for All policy, under section 3 'Pathways to Increasing New Housing Supply', it states,

"It may be necessary for a Local Authority to zone more serviced land in a development plan than would equate to meeting precisely the projected housing demand for that settlement, to provide choice in sites locally and to avoid restricting the supply of new housing development through inactivity on a particular landholding"

- By zoning the subject site RN1, it provides choice and avoids restricting supply through and over reliance on all the lands in SLO4 & SLO5.

6. Wicklow County Development Plan (CDP) 2022-2028 Policy

Arklow is defined as a level 3 "self-sustaining growth town" under the Wicklow Settlement Hierarchy with towns in level 3 targeted for growth rates of 25-30% with 790 new homes targeted by 2028.

Table 3.4 Wicklow Settlement / Aggregate Settlement Population Targets 2016, Q2 2028

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		

CDP 2022-2028

Table 3.5 Wicklow Settlement / Aggregate Settlement Housing Targets to Q2 2028 and Q4 2031

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
1	Bray	11,232	165	100	4,026	771	5,062
2	Wicklow - Rathnew	5,456	650	200	1,267	275	2,392
3	Arklow	5,406	165	100	790	166	1,221
	Greystones - Delgany	6,766	875	400	508	170	1,953
	Blessington	1,914	5	40	393	81	519

CDP 2022-2028

It should be noted that these figures and targets are based on 2016 census figures and should now be projected upwards as the NPF Housing Growth Requirements issued in July 2025 states,

“Planning Authorities should initially assess the current adopted development plan and review the core strategy and associated settlement strategy and zoning objectives against the objectives of these Guidelines.”

Please see the table below showing the approved new residential developments approved and live within Arklow presently.

Address	Planning	Existing Built Environment	No. of Units	Comment
Yellow Lane	20/1210	Tier 1	32	Private
North Quay	23/381	Tier 1	34	Private
Alps	24/84	Tier 1	99	Private
Kilbride	23/756	Tier 2 (SLO5)	86	Private
Moneylands	24/325	Tier 2 (SLO4)	476	Private
Abbeylands	24/352	Tier 2 (SLO3)	74	Local Authority
Emoclew Road	25/60199	Tier 1	38	Private
Total			839	
			203 (24%)	Tier 1 lands
			636 (76%)	Tier 2 lands

- **It should be noted that none of these developments have been commenced or completed so the activation rate is 0%.**
- The lands at Moneylands accounts for over 50% of the units (7-year permission)
- 76% of approved units are on un-serviced lands outside the existing built-up area of Arklow

Based on the current activation rate of 0% for approved lands, RN2 land would remain sterilised and undeveloped for several years.

As a result, the Draft Local Area Plan should be increasing housing availability by eliminating the RN2 criteria altogether to ensure there is suitable “ready to go” serviced land available for development now.

We note that recent Government directive to local authorities in relation to the National Planning Framework and the delivery of housing, has recommended to local authorities of moving RN2 lands to RN1 zoning and in particular lands that are on the periphery of townlands and are serviced.

The landowner welcomes this proactive approach as their subject site represents Tier 1 land and is a ‘ready to go’ development site located sequentially to the existing footprint to the west of the town and should be identified as a high priority for development.

Under Chapter 3, Core Strategy of the CDP 2022-2028, the zoning principles state the following,

Principle 1: Compact Growth, states that *“a minimum 30% housing growth targeted in any settlement is to be delivered within the existing built-up footprint of the settlement.”* and it further states that *“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.”*

- By allowing the subject site to be included as RN1 zoning, it will help to increase the minimum housing growth target within the existing built-up footprint of the settlement towards the 30% minimum standard

Principle 2: Delivery of Population & Housing Targets, states that,

“Town centre regeneration / infill / brownfield developments normally located within the existing built-up part of the settlement, generally on lands zoned ‘town centre’, ‘village centre’, ‘primary area’, ‘existing residential’ and other similarly zoned, already developed lands will be prioritised and promoted in the first instance for new housing development.”

- The subject site is located within the existing built-up part of the settlement and has for the past twenty years been zoned new residential.

Principle 3: Higher Densities, states that,

“It is an objective of the Council to encourage higher residential densities at suitable locations, particularly in existing town / village centres and close to existing or proposed major public transport corridors and nodes.”

- As per the Arklow 2025 Walking Times from Arklow Train Station and Bus Stops, the subject site is within 15 minutes walking time of both.

Principle 4: Sequential Approach, outlines the priority locations for new residential development
With Tier 1, serviced zoned land to be given priority.

- *This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.*
- *These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*
- *Inclusion in Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.*

Applying the above core zoning principles, it is evident that the subject site meets all the above criteria being within the existing built-up area of the town, surrounded by residential land and close to all public amenities and having no impediment relative to roads infrastructure or provision of mains services.

7. 2025-2028 Arklow Local Planning Framework

Under the draft 2025-2028 Arklow Local planning framework, the subject site is zoned “RN2 – New Residential Priority 2” lands, where permissions will only be considered during the lifetime of this plan where the following conditions

- *At least 75% of Priority 1 new residential lands (RN1) lands have been activated (i.e. consent obtained and development initiated);*
- *It can be shown that the housing / population generated by the proposed development would not result in the prevailing Core Strategy targets at the time of the decision to grant permission being significantly breached.*

Under section B9.2, ‘Phasing’, it states that lands should generally be phased in accordance with the sequential approach,

- *Development should extend outwards from the town centre with undeveloped land closest to the centre and public transport routes (if available) being given preference, i.e. ‘leapfrogging’ to peripheral areas should be avoided;*
- *A strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands; and*
- *Areas to be developed should be contiguous to existing developed areas.*

It should be noted that the majority of lands zoned for RN(1) are confined to 2 large un-serviced sites that require extensive infrastructure works to provide roads and provision of water and foul services and there is no guarantee these can be delivered during the lifetime of this plan.

The subject site is a tier 1 serviced site ready for development and independent of any third parties for the provision of infrastructure or services.

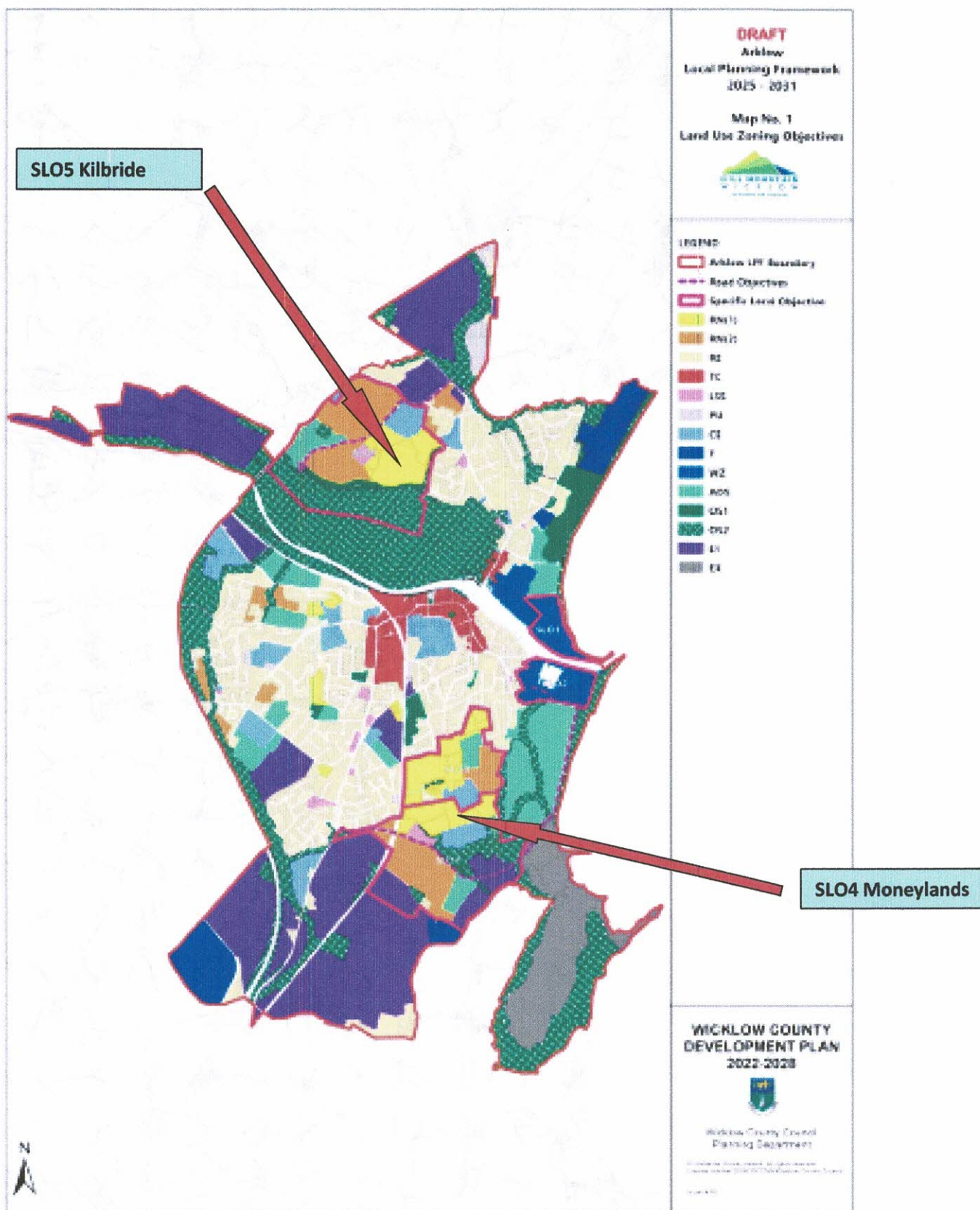
As per Section A3.2, 'Sustainable Transportation', the site is easily accessible by walking or cycling to the town centre to the east and by vehicles to the M11 to the south.

Section A3.2.1, 'Impact of future development options', specifically states greenfield lands have been identified for new residential and employment development only where:

- *they are serviced or serviceable with footpaths and cycleways;*
- *are within c.30 minutes' walk time of a train station;*
- *are within c.15 minutes' walk time of an existing or a committed bus service;*
- *they are located within a c.15-minute walk of the town centre.*

The subject land is well connected by local bus and train links, with all located within a 15-minute walking distance and there is a range of local neighbourhood facilities including shops, church, schools within a 10–15 minute walking distance from the subject site.

Considering the previous zoning for existing and new residential use on the subject lands, the principle of residential development is well established at the location having been deemed acceptable to the council over the past 20 years, it must be accepted that the zoning of these lands for residential land use is in accordance with the sequential and proper planning and sustainable development of the area.



In relation to the proposed land use zoning for new residential, please note the following in relation to the 2 large areas of land zoned RN1:

SLO5 Kilbride

- This is the only site to the north of the town zoned RN1 limiting new development to this land only.
- The land is owned by one landowner creating a monopoly for the delivery of housing north of the river.
- The land has no infrastructure in terms of internal roads layout or mains services and it is highly unlikely that Irish Water will deliver the new connection required from the site to the treatment plant during the lifetime of the plan
- Due to the large scale of the development and the approved permission(PRR: 23756) being wholly reliant on permission (PRR: 2560387) which was refused and is under appeal, the likelihood of this land even commencing during the lifetime of the plan is optimistic.

SL04 Moneylands

- All land zoned RN1 is owned by one landowner creating a monopoly for the delivery of housing in the town.
- The permission is for 7 years so it is unlikely that the required housing will be delivered in the lifetime of the plan.
- The land has no infrastructure in terms of water and wastewater with extensive works required for connection.

Table B:3.1 Residential Zoning RN1 & RN2

Location	Area (ha)	Status (Q3 2025)	Area Type	Zoning /Priority
South Vale Road	0.8	No permission	Urban Neighbourhood	RN1
Rear of Arklow Tennis Club	0.9	No permission	Urban Neighbourhood	RN1
West of Marian Villas/Sheephouse	1.75	Local Authority Scheme in design	Urban Neighbourhood	RN1
South of Yellow Lane	0.7	Development permitted	Urban Neighbourhood	RN1
South of Emoclew Road	0.5	Development permitted	Urban Neighbourhood	RN1
SLO3 Abbeylands Tinahask North	16.5	Local Authority Scheme permitted on c. 2.7ha	Urban Extension	RN1
SLO4 Moneylands Tinahask South	11.7	Development permitted on c. 19.3ha	Urban Extension	RN1
SLO5 Kilbride	16.8	Development permitted on c. 2.7ha	Urban Extension	RN1

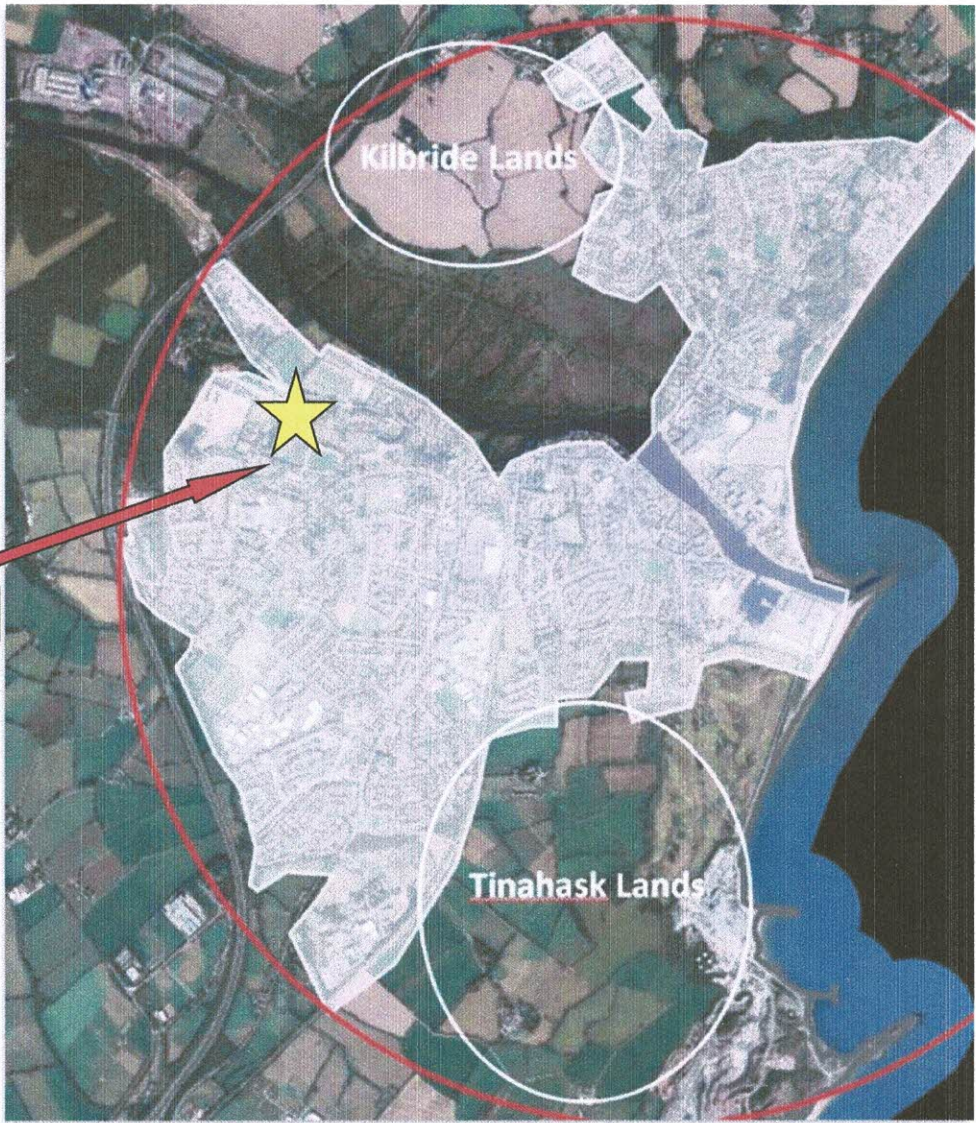
In relation to the smaller sites zoned RN1, please note the following:

- Lands at Marian Villas are for local authority houses only.
- Lands at Rear of Arklow Tennis club is deficient in traffic access (PRR: 05610098)

The subject site at Vale Road has been zoned “New Residential” for the past twenty years, is fully serviced via an agreed connection to Heatherside estate and is in close proximity to local services so it should be zoned RN1 under the new local area plan. The proposed RN2 zoning is technically de-zoning the lands for the next 5 to 10 years with the town reliant on two developers to deliver the required housing.

Section A3.3.2, 'Impact on Future Development Options for Arklow' highlights the existing built-up areas of Arklow and lands within 2km of the town centre.

Figure A3.10: Existing Built Up Area of Arklow with 2km radius Arklow Town Centre



Draft LAP 2025-2028

As per section B3.1 'Zoning for residential development', the subject site represents a "edge of centre "location within the existing built-up environment of the town where it states that,

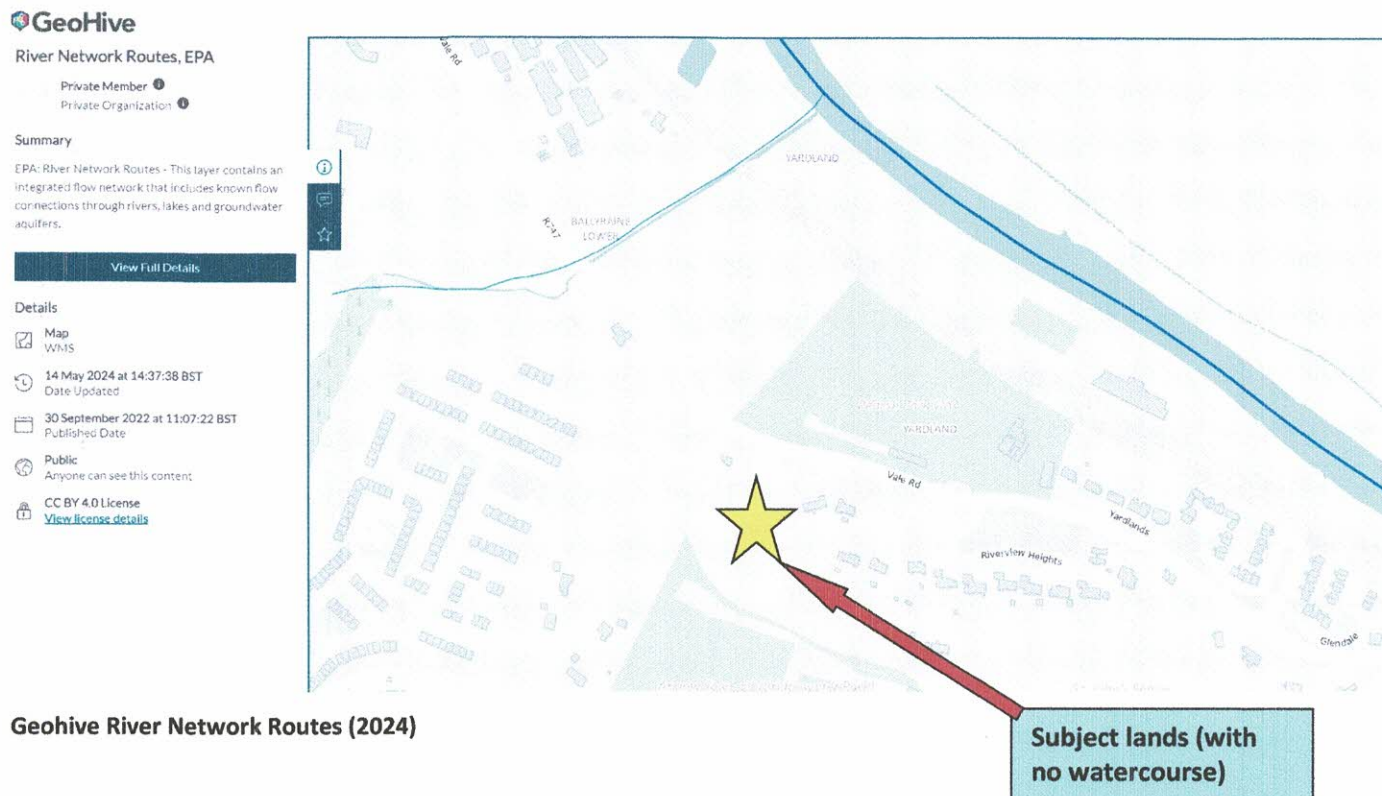
- *Edge of centre' locations will be considered the priority location for such new greenfield residential development and will generally be zoned as 'New Residential - Priority 1' (zoned RN1). These sites are*

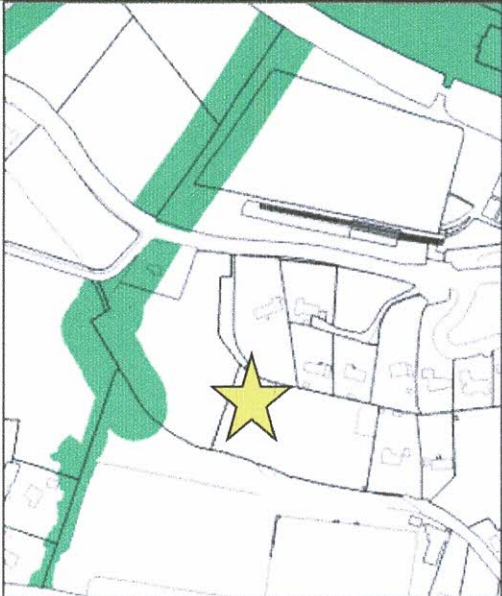
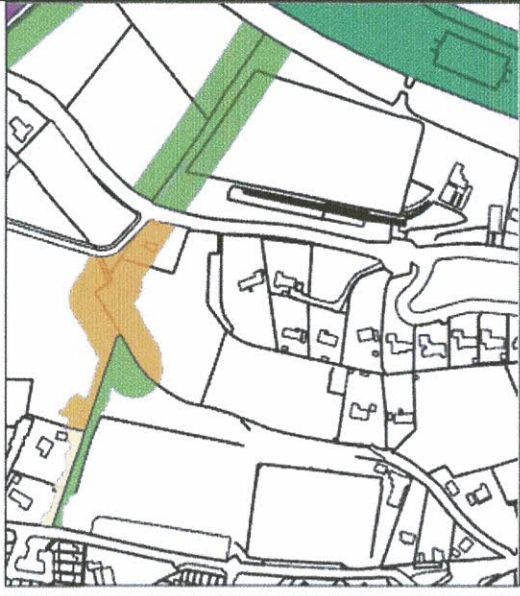
generally within a 15-minute walk of the Arklow Main Street and/or a 15-minute walk of Arklow Train Station.

Under the draft 2025-2028 Arklow Local planning framework, a portion of the subject site is zoned **OS2, Natural Areas**, *to protect and enhance existing open, undeveloped lands.*

This has been decided based on a desktop study that is incorrect and its conclusion to re-zone a portion of the site as OS2 has a detrimental impact on the proper planning and sustainable development of the site.

- Please see the Geohive River network map showing no watercourse at this location but located further to the north.



Location	South Bank East Watercourse
Description	Watercourse passing under rail line into the Avoca River in the vicinity of sporting facilities. A contiguous wooded area to the south of the watercourse provides an ecological corridor between as far as Lamberton Avenue
Map of GI asset	Land Use Zoning Arklow LAP 2018
	 OS2 'Passive Open Space', R28 'New Residential', RE 'Existing Residential'.
Key considerations impacting future zoning	Watercourse 25m riparian buffer zone CPO 17.26, Previous Zoning, Existing areas of woodland/forestry CPOs 17.18-17.23.
Recommendation for New LPF	
Zone all lands identified as GI assets OS2 'Natural Areas'.	

2025 Green Infrastructure Audit

It is noted that this portion of land is a *“contiguous wooded area to the south of the watercourse provides an ecological corridor between as far as Lamberton Avenue”*

- This land is only overgrown as it has been vacant for the past twenty years since the commercial premises closed. There is a new storm culvert built as part of the Heatherside development and the mature boundary trees are to remain as indicated in the last planning application but there is no natural ecological corridor as indicated by the desktop study.

- The rezoning of this land would eliminate an agreed access onto Heatherside estate and force the site to open another entrance onto the Vale Road which will impact traffic safety.
- It will also reduce the land available for development impacting housing density at a time when Government policy is to increase densities on zoned serviced lands.

As a result, the landowner requests that all the subject site is zoned as RN1.

8. Conclusion

While the draft Arklow local area framework for 2025-2028 sets out its vision for new residential development in the town, its over reliance on un-serviced lands at 'out of centre' sites that are unlikely to commence in the lifetime of this plan goes against the policies and objectives contained within the plan.

By rezoning the lands as RN1 'New Residential', it promotes and increases housing targets in accordance with the National Planning Framework (Apr 2025) and the NPF Implementation: Housing Growth Requirements (July 2025)

Please note the following:

- The subject site is in line with national, county and local policy.
- The site has been zoned "new" residential in the last 3 development plans.
- The site is located within the existing residential built environment of Vale road
- Main's services connection is present and available from Heatherside estate.
- The existing entrance onto the Vale road serving both Heatherside and any future development on this site satisfies road safety, eliminates traffic hazard concerns and represents proper planning and sustainable development of this site.
- Existing road, pedestrian and cycle network directly adjoin the site.
- The site is located within 15- minute walk from the town centre.

As a result, the landowners respectfully request that the subject site is rezoned from RN2 to RN1, New Residential as it is evident that it meets all criteria for new residential development and the proposed RN2 zoning is actually freezing the site from development now.

We kindly request that the proposals raised above are given consideration in the preparation of the new local area plan.

Yours sincerely,



Jonathan O'Toole
BA. BSc. Civil Tech. IEI