

	Arklow LPF Variation No.5
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Who are you:	Agent
Name:	McCutcheon Halley
Reference:	ARKLPF-140931
Submission Made	November 12, 2025 2:46 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 B Settlement Specific Objectives.

- B.9 Zoning & Land Use

Maps:

- Land Use Map
- Key Green Infrastructure Map

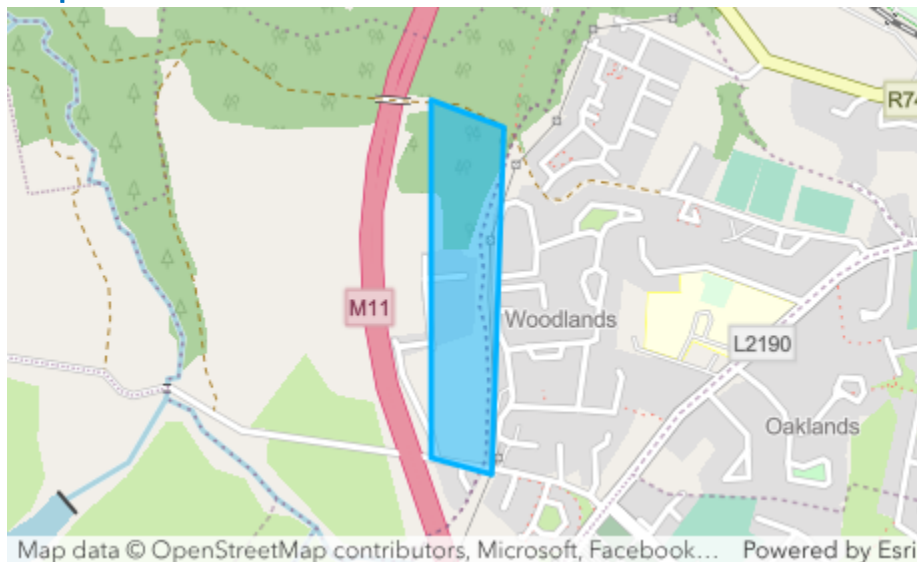
Appendices:

- Green Infrastructure Audit

Maps:

NB - Please refer to attached submission for full details of submission. This may include overlap with other categories listed above. This submission is made by McCutcheon Halley Planning Consultants (contact email address: cmcmahon@mhplanning.ie) on behalf of Mellon and Kavanagh (contact email address: jimmyvmellon@gmail.com). The contact address for McCutcheon Halley Planning Consultants is 6 Joyce House, Barrack Square, Ballincollig, Cork. The contact address for Mellon and Kavanagh is Mellon Construction, Ballyraine, Arklow, Co. Wicklow.

Map



Site Description:

Please refer to mapping within attached submission for full accuracy. The mapping portal above does not allow for providing two segments of land.

[Upload a File \(optional\)](#)

SUB_251112_Ballyraine_Variation_CM_LOL_FINAL.pdf, 1.18MB



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Planning & Development,
Wicklow County Council,
County Buildings,
Wicklow. A67 FW96

11th November 2025

Re: Development Lands at Ballyraine, Arklow, Co. Wicklow.
My Clients: Mellon and Kavanagh.

Dear Sir/Madam,

With reference to the above development lands, I wish to confirm that in early 2024 I was instructed to prepare an LRD planning application thereon. The application and its documents would have to mitigate the previous reasons for refusal on the lands. In that regard the applicants instructed and received a Bat and Badger report, Arborist's report, Traffic Impact assessments, Noise impact assessment, and various other environmental reports that will be required for the LRD application process.

The LRD will seek to mitigate the main reasons for refusal on a 2023 application on the subject lands. It should be noted that the main reasons for refusal related to a proposed interchange at the Lamberton Avenue bridge over the M11 motorway and the proposed relief road through the subject lands, of which both proposals that were objectives in the LAP 2018-2024 do not appear in the recently published draft LAP. It should also be noted that the HSA, Irish water and National Transport Authority wrote favourable submissions to the 2023 refused application.

I further confirm that we are at an advanced stage in the preparation of the architectural and engineering drawings for the site to a stage where a section 247 preplanning consultation can be sought. The only reason the applicants have not applied for the section 247 consultation is that they wished to wait until the draft Arklow Town LAP was published so any new objectives affecting the site could be taken into account in the overall design. It was unexpected that the subject lands would not be proposed for residential zoning in the draft plan. The proposals in the LRD shall set aside circa 9 acres of the subject lands for 'OS2' for ecological and biodiversity purposes. It is envisaged that this land would be dedicated to the Local Authority and will form a green corridor linking Johnstown Road to Lamberton Avenue with the possibility of future pedestrian and cycle ways linking both roads.

I can also confirm that the subject site is fully serviced by Irish Water with public water supply and waste water drainage, ESB and storm water drainage and is also conveniently connected to the Town Centre for pedestrians via Lamberton Avenue, is a short cycle to schools, sports grounds, the town centre/shops and services and the train station.

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The applicants are committed to developing a high-quality residential scheme and to date have placed significant resources into the Design and Planning of the subject lands. It was initially envisioned that an application for the section 247 preplanning consultation would take place a short time after the draft LAP was published.

If you require any further information, please do not hesitate to contact me.

Yours sincerely,

Michael Molloy.
Dip. Arch. Tech. RIAI(Tech), MCIAT, MCABE

Variation No. 5

Proposed Variation / Draft Local Planning Framework

For lands at Ballyraine Upper, Arklow, on behalf of Mellon
+ Kavanagh

November 2025



McCutcheon Halley
CHARTERED PLANNING CONSULTANTS

Document Control Sheet

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1. Overview

This submission has been prepared by McCutcheon Halley Planning Consultants in relation to lands (approx. 7.5ha) at Ballyraine Upper, Arklow, Co. Wicklow (see Figure 1). The lands are owned by our clients, **Mellon and Kavanagh**.

The submission is in response to the Variation No. 5 – a proposed variation to the Wicklow County Development Plan 2022-2028 and Draft Arklow Local Planning Framework.

Under both the existing development plan and the proposed variation no. 5, our client's site is located within the settlement boundary of Arklow.

Under the existing Development Plan (as informed by the Arklow and Environs Local Area Plan 2018-2024), the subject lands are zoned 'R28 - New Residential' and 'RE-Existing Residential', with lands acting as the M11 buffer zoned for 'OS2 - Open Space 2'. These are also within our client's ownership, but not subject to this zoning request.

Under the proposed variation, the proportion of the site zoned for new residential has been reduced, and its specific designation has changed to 'RN2 – New Residential Priority 2'. Furthermore, the proportion of the site zoned for open space has increased (zoned as OS2 – Natural Areas).

Our clients attended one of the Council's workshop events on the Draft Framework plan and understand that the reason for the proposed re-zoning from residential to open space is to promote biodiversity.

Our clients would like it noted that they are committed to working with the council to achieve all the objectives set out in the local planning framework including providing c. 9 acres of land within their landholding, set aside and dedicated entirely to green corridors & biodiversity.

1.1 Purpose of Submission

The purpose of this submission is to request that the Council reinstate the full extent of the 'New Residential' land within our client's landholding that is currently zoned in the Arklow and Environs Local Area Plan 2018 and the adopted Development Plan.

Giving regard to the new designations for residential zoning under variation no. 5, it is also requested that the 'New Residential' land on our client's site be rezoned from 'RN2 – New Residential Priority 2' to 'RN1 – New Residential Priority 1'.

1.2 Enclosures

This submission is supported by a letter from Molloy Architecture who have been appointed by the clients to prepare an LRD application for the overall landholding including the subject lands.

It is noted in this letter that the instruction to proceed with the LRD was issued in early 2024, following a refusal in 2023. A draft application is nearing

completion and will be submitted in the near future for the lands as they remain zoned under the existing LAP.

We also note that the reason for the delay in progressing the LRD application and commencing pre-app discussions related to the clients waiting for the draft LAP to be published, to incorporate objectives relevant to the site.

Molloy Architecture expressed their surprise, also that of our clients, that upon publication of the draft, the lands are proposed to be de-zoned.

2. Site Context

Our client's landholding is located at Ballyraine Upper, Arklow, Co. Wicklow. The subject lands measure 7.5 ha.

The northern section of the landholding contains existing treelines and grassland/shrubland, while the southern and western parts of the landholding contain grassland/shrubland.



Figure 1: Subject Lands with lands requested for rezoning. Basemap: Google Maps.

The northern part of the site was purchased from Coillte. The area of the site joining Lamberton Avenue and the M11 motorway was a commercial forest consisting mainly of pine and spruce trees, planted approx. 90 years ago. This coniferous forest was clear felled by Coillte in 1999/2000, under license and before being acquired by our clients. Willow and scrub grew thereafter, with the only trees on the site today along the site boundaries.

The lands to the west of the Motorway, from the Johnstown Road, up to the Vale Road to the north of the site (c.152 acres) is part of the Mellon

farmholding, connected via the bridge that crosses the m11 at the north of our site.

The Emyvale estate adjoins the site and this was built by our clients and is still in their ownership. The Emyvale estate was permitted under P.A. Ref no. 05/2668 (including subsequent amendment applications) with 33 of the permitted 79 dwellings constructed before the economic crash led to works ceasing in 2008. The estate is fully serviced, and existing pedestrian / vehicular connections are available from the Johnstown Road.

The lands are currently zoned 'R28 - New Residential' and 'RE-Existing Residential' (see Figure below) in the Arklow and Environs Local Area Plan 2018-2024).



Figure 2: Site zoning map as per Arklow 2018 LAP. Lands relevant to this submission shown in yellow.

A number of planning applications have been submitted in respect of the subject lands in recent years (refer to planning history below).

A new design team has been appointed, including Molloy Architecture, and an LRD application is currently being prepared for the residentially zoned lands, addressing the reasons for refusal in the previous applications. A request for a S.247 meeting is due to be submitted shortly.

2.1 Planning History

There have been seven planning applications on the subject site. These are listed below.

- P.A. Ref no. 05/2668: Permission sought and approved for 30 no. 3-bed semi detached houses, 22 no. 3-bed terraced houses, 8 no. 3-bed corner terrace houses, 7 no. social 3-bed houses, 8 no. 2-bed terrace houses, 4 no. affordable 3-bed semi-detached houses and associated access road/site works. Some of the house types were amended under P.A. Ref no. 06/6680; P.A. Ref no. 08/1062; and P.A. Ref no. 08/1236.
- P.A. Ref no. 23/447: Permission to erect 6 no. dwelling houses, consisting of 6 no. 3-bedroom dwellings, provision of vehicular and pedestrian access and all associated ancillary works, granted on 17/11/2023.
- P.A. Ref no. 23/796: Permission sought to erect 21 no. dwelling houses, consisting of 6 no. 3-bedroom dwellings, 1 no. 3-bedroom dwellings, 8 no. 3-bedroom dwellings, 6 no. 2-bedroom dwellings and all associated site works. Permission was refused on the grounds of issues regarding design / layout, wastewater treatment and ecology.
- P.A. Ref no. 23/845: Permission sought for a development comprising of 95 no. dwellings comprising 71 no. semi-detached and terrace houses with 2,3 and 4 bedrooms together with 24 no. apartments in 6 blocks, a creche, and all ancillary site development works. This permission was refused on the grounds of design/layout, the peripheral location of lands and the absence of deliverables provided, such as an Ecological Impact Assessment and Social Infrastructure Audit.

The reasons for refusal are summarised below, with our response provided in terms of how each of these can be addressed going forward.

Refusal Reason	LRD / Future application Response
Issues regarding design / layout including the development of green infrastructure resources and the western distributor.	Design / Layout concerns will be addressed as part of a revised Site Layout Plan.
Concerns regarding peripheral location of lands.	Application to include justification to demonstrate that the proposed development is in line with sequential development approach.
Absence of information provided including Ecological Impact Assessment, Social Infrastructure Audit	Any outstanding deliverables will be provided as part of a revised planning application.

Concerns regarding proposed connection to private wastewater treatment system.

The revised planning application will include a connection to the public wastewater system.

Concerns regarding impact on biodiversity in the area.

The revised planning application will include an Ecological Impact Assessment Report.

3. Planning Policy Context

3.1 Revised National Planning Framework

On April 8th, 2025, the Government approved the Revised National Planning Framework (RNPF). 2025.

The Revised NPF sets new housing targets based upon updated population projections with a new national housing target of on average 50,000 homes per annum. The revised NPF also requires an uplift of 50% in housing output and need for additional zoned land for residential development.

National Policy Objective 101 refers to the tiered approach with which planning authorities shall be required to follow when identifying lands to be zoned. Objective 101 states the following;

“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.”

3.2 NPF Implementation – Housing Growth Requirements (2025) Guidelines for Planning Authorities

Further to approval of the Revised NPF in April 2025, Guidelines on the *NPF Implementation – Housing Growth Requirements Guidelines for Planning Authorities* were published setting out the housing demand scenarios for each of the local authorities, including Appendix 1 which translated the NPF requirement of 50,000 units nationwide, per annum, into housing targets for each area.

For Wicklow County, the Guidelines provide for 2,068 no. of housing units per annum up to 2034. This is a significant increase on the adopted Wicklow County Development Plan 2022-2028, which has an annual housing supply target of 1,411 no. of housing units per annum.

It should be noted that the 2022 CDP target does not give regard to the *NPF Implementation: Housing Growth Requirements – Guidelines for Planning Authorities*

Under the published Guidelines, the annual housing target for Wicklow has increased by 657 units to 2,068 new housing units annually up to 2034. This is a significant increase (47%) on the annual target for new houses under the current Development Plan, and is before any additional headroom under the NPF is included in annual targets.

It is noted that the Proposed Variation and Draft LPF notes the following in relation to future supply and changes to housing targets:-

“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."

3.3 Regional Spatial and Economic Strategy for the Eastern and Midland Region

Under the *Regional Spatial and Economic Strategy for the Eastern and Midland Region* (RSES), Arklow is designated as a self sustaining growth town / 'Key Service Centre – Level 3'. The RSES describe Arklow as a settlement, which has *'a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area.'*

3.4 Sustainable Residential Development and Compact Settlement Guidelines 2024

Arklow falls under the category of 'Large Towns' as it has a population of greater than 5,000. The Guidelines include a number of key priorities for the growth of Key Towns including

- (a) Plan for an ***integrated and connected*** settlement overall, ***avoiding the displacement of development generated by economic drivers*** in the Key Town or Large Town to smaller towns and villages and rural areas in the hinterland.

....

and

- (e) ***Deliver sequential and sustainable urban extension at locations that are closest to the urban core and are integrated into, or can be integrated into, the existing built up footprint of the settlement.***

In relation to residential density, Section 3.3.3 states that residential densities in the range of 30 dph to 50dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns.

3.5 Arklow and Environs Local Area Plan 2018-2024

The Arklow and Environs Local Area Plan 2018-2024 is the current land use plan for Arklow Town and the surrounding environs. The Wicklow County Development Plan 2022-2028 gives regard to the policies and provisions of this Local Area Plan (LAP). Under the LAP, our client's site is zoned for 'OS2 - Open Space 2', 'R28 -New Residential' and 'RE-Existing Residential'.



Figure 3: Site Zoning map as Arklow and Environs Local Area Plan 2018-2024.

The LAP outlines the objective for sites zoned for 'R28 – New Residential':

"To protect, provide and improve residential amenities at a density up to 28 units/ha."

"To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities." (Source: page 53).

Additional context to the R28 zoning is provided on p. 18:

"New residential development is provided on lands zoned 'new residential' (R28, R20, R10, R Special zones) and new 'local shops and services' areas (LSS zone). 'Edge of centre' locations will be considered the priority location for new residential, while 'out of centre' housing sites will only be considered on the basis of integrated/community facilities/open space schemes that can be well connected to the existing built up area."

The objective for lands zoned 'RE – Existing Residential' is outlined in the LAP:-

"To protect, provide and improve residential amenities of existing residential areas."

"To provide for house improvements, alterations and extensions and appropriate infill residential developments in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designed or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted." (Source: page 53)

Furthermore, the LAP states that RE – Existing Residential areas have potential development opportunities with redevelopment, backland and infill developments.

The objective for lands zoned 'OS2 – Open Space' is as follows:

"To protect and enhance existing open, undeveloped lands."

"To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along EU and nationally protected site (Natura 2000 sites, NHAs etc), watercourses and rivers, steep banks, green breaks, between built up areas, green corridors and areas of natural biodiversity."

The current LAP also includes a number of roads objectives relevant to the subject lands, including a proposed interchange at Lamberton Avenue and relief road through the lands.

Neither of these proposals are included in the Draft Arklow LPF and this is welcomed by our clients.

3.6 Proposed Variation no. 5 of Wicklow County Development Plan 2022-2028 / Draft Arklow Local Planning Framework

The Draft Arklow Local Planning Framework (LPF) is included within Variation no. 5 of the Wicklow County Development Plan 2022-2028.

Settlement Strategy

The CDP (and The Draft Local Planning Framework) recognises the important role Arklow plays in the development of the County, as a Self-Sustaining Growth Town and the main settlement in the south of the county. Within the overall settlement hierarchy, Arklow is identified as a 'Level 3 – self sustaining growth town', with Wicklow Rathnew and Bray as Level 2 and Level 1 respectively.

The role of the Town is recognised in providing services and facilities for its residents and a large geographical area in its hinterlands.

*“Arklow is identified **as growth centre** which should become more **economically self-sustaining** and is **a key focus for economic growth in the County**. The town should **aim to attract a concentration of major employment generating investment** including high quality knowledge based employment and **should target investment from foreign and local** sources in a mixture of ‘people’ and ‘product’ intensive industries.*

*The regional ports are recognised in the RSES **as important centres of economic activity**, and the RSES seeks to protect and support the role of regional ports, including Wicklow and Arklow Ports as economic drivers for the Region.”*

(Source: Draft LPF)

Core Strategy / Housing Targets

Under the Draft LPF, the same housing targets for Arklow included in the current Development Plan are carried forward i.e. a housing stock target of 6,461 units by 2028 for Arklow. This will increase to 6,627 by 2031. Current housing stock levels are 5,585 units (Census 2022).

Land Use Zoning – Proposed Changes

Under the Draft LPF, the site is zoned for RN2 – New Residential Priority 2, OS2 – Natural Areas and RE – Existing Residential.

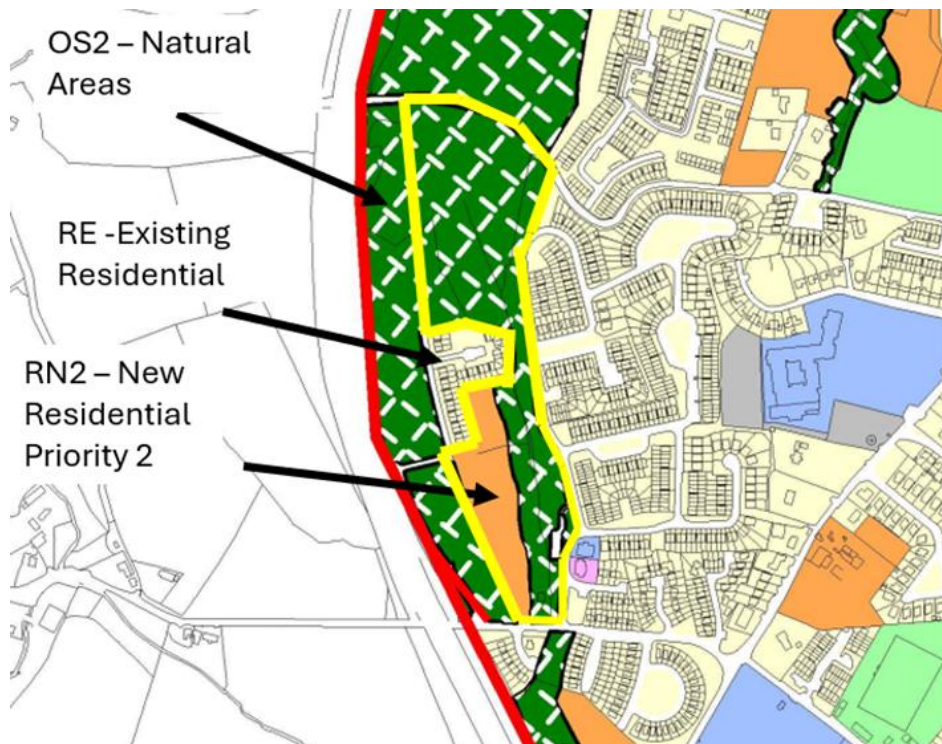


Figure 4: Site Zoning Map as per Proposed Variation no. 5 to Wicklow County Development Plan. Lands relevant to this submission highlighted in yellow.

We note that the proportion of the site zoned for new residential purposes has decreased from that of the 2018 Arklow LAP with lands to the south and east of Emyvale, adjoining Woodlands now proposed as OS2 – Natural Areas.

All lands to the east of Emyvale, are zoned OS2 Natural Areas and this is recognised as appropriate for open space / biodiversity and also a buffer to the M11.

Section 9.1 of the proposed variation outlines the objective for land zoned as 'RN2 – New Residential Priority 2.'

"To provide for new residential development and supporting facilities where it can be demonstrated that such development would accord with the Core Strategy housing target for that settlement in accordance with the objectives set out in the LPF."

"To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities."

Section 9.2 states that in order to ensure a long-term supply of zoned residential land, in particular to ensure flexibility in the event of an increase in housing targets during the lifetime of this LPF, RN2 – New Residential Priority 2 lands are provided.

Section 3.1 states that development on lands zoned RN2 will only be considered where Objective ARK 18 is satisfied, and on the basis of integrated housing / community facilities / open space schemes that can be well connected to the existing built up area. Objective ARK 18 states the following:

"Notwithstanding the zoning/designation of land for new 'greenfield' residential development (RN), permission will only be considered for RN2 Priority 2 lands where the following conditions are satisfied:

- *At least 75% of Priority 1 new residential lands (RN1) 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 application being significantly breached."*

Section 9.1 indicates the zoning objectives for 'RE – Existing Residential'.

"To protect, provide and improve residential amenities of existing residential areas."

"To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the

areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic parts of the overall residential development; however new housing or other non-community related uses will not normally be permitted."

Section 3.1 also states that areas zoned for RE – Existing Residential, present significant housing opportunities through densification of the existing built up area, re-use of derelict or brownfield sites and the development of infill and backland sites.

Section 9.2 outlines the objective OS2: Natural Areas:

"To protect and enhance existing open, undeveloped lands."

"To protect, enhance and manage existing open, undeveloped lands that comprise flood plains, buffer zones along watercourses and rivers, steep banks, green breaks between built up areas, green corridors and areas of natural biodiversity."

Section 9.2 of the proposed variation states that 'RN1 – New Residential Priority 1' lands are needed to be zoned to meet the current targets. Section 9.1. states that the objective these lands is as follows:

"To provide for new residential development and supporting facilities during the lifetime of the LPF."

"To facilitate for the provision of high quality new residential developments at appropriate densities with excellent layout and design, well linked to the town centre and community facilities. To provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities."

Roads Objectives

It is noted that the proposed M11 interchange at Lamberton Avenue and relief road through the subject lands, provided for in the 2018-2024 LAP, has been omitted from the proposed Variation / Draft LPF.

This is welcomed by our clients.

4. Rationale for retaining existing Residential Zoning

4.1 Need for additional residential zoned land

The current Wicklow County Development Plan 2022-2028 (and reiterated in the proposed variation), Arklow has a housing target of 876 new dwellings by 2028 and 1,042 by 2031.

The Draft Framework / Proposed variation is based upon the current core strategy in the CDP which does not account for the revised housing targets in the NPF, the Countywide allocation in the NPF Implementation Guidelines of the additional headroom.

It is reasonable to assume that the additional allocations under the NPF Guidelines (an additional 657 units annually, with headroom for a further 1,034 units annually) will result in a significant allocation to Arklow as a Level 3 town, an important growth centre in the county and the main centre in the south of the county.

We consider the projection in the Draft Framework to be the minimum level of housing required to serve the town. We further consider that with the completion of the wastewater treatment plant, the development of the Echelon data centre and the growth in remote working, will all result in an increase in the population of Arklow.

The subject lands are ready and available and should be zoned in their entirety for 'R1 -New Residential Priority 1' to meet this demand and national call to support the accelerated delivery of housing.

Section 3.2.1 of the Draft Arklow LPP states that greenfield lands have been identified for new residential development where the criteria listed in the table below have been met.

As evident from our response in column 2, the subject lands meet all four criteria.

Criteria for RN1 Zoning	Subject Lands Analysis
They are serviced or serviceable with footpaths and cycleways	There is footpath access to the site from Johnstown Road, serving the existing Emyvale estate, while Lamberton Avenue connects the site to Arklow's Upper Main Street via a safe walking and cycling route.
Are within c. 30 minutes' walk time of a train station	The site is within a 30 minute walk of Arklow Train Station
Are within c. 15 minutes' walk time of an existing or a committed bus service	The site is within a 20 minute walk of existing bus services, with the

They are located within a c. 15 minute walk of the town centre.

proposed Bus Route B within 5-10 mins of the subject lands.

The site is located outside the 15min. walk to the town centre but are located at a similar distance from the town centre to other RN1 lands. The lands are also within 750m of existing primary and post primary schools, childcare facilities, and also existing shops, supermarkets etc. located near the train station.

4.2 Compact, Sequential Development

It was considered under P.A Ref no. 23/845 that the subject lands were located in a peripheral location in Arklow, and the provision of a residential development would therefore undermine the sequential approach as set out in the County Development Plan.

The subject lands are immediately adjoining existing residential development, with the Emyvale estate in the centre and Woodlands along its eastern boundary with new housing at Heatherside to the north and connections to Lamberton Avenue.

Additionally, the lands are conveniently located 1.5km (20 minute walk or 6 minute cycle) from the centre of Arklow. There are also a number of social amenities within easy walking distance to the subject lands including the following sporting facilities:- the Arklow Town Football Club on Lamberton Avenue (c.450m from the subject lands); Arklow United FC; Arklow Geraldines Ballymoney GAA and Arklow Rock Parnells GAA Club (less than 10 minute walk).

There are also a number of primary and secondary schools located within a 15 minute walk of the site. These include Gaelscoil an Inbhir Mhóir (primary school), St. John's SNS (primary school), Carrysfort Mixed National School (primary school), Arklow CBS (secondary school) and Glenart College (secondary school). On this basis, the lands are suitably located to accommodate residential development, giving regard to their proximate distance to educational and social facilities, along with the centre of Arklow.

The NPF and the Compact Settlement Guidelines prioritize compact growth and emphasise sequential development as well as infill and brownfield before greenfield. The subject lands are sequentially located, they are serviced and serviceable, and well connected to the adjoining neighbourhoods. In addition to this, the subject lands are a natural extension to the neighbourhood and will be an infill development capitalising on existing infrastructure serving the area. The subject lands will also create a

compact neighbourhood, closing the gap between existing residential and the M11 open space buffer.

4.3 Proximity to social infrastructure and community facilities

Additionally, the lands are conveniently located 1.5km (20 minute walk or 6 minute cycle) from the centre of Arklow. There are also a number of social amenities within very close proximity to the site. These include the Arklow United Football Club and Arklow Rock Parnells GAA Club (both are less than 10 minute walk). There are also a number of primary and secondary schools located within a 15 minute walk of the site. These include Gaelscoil an Inbhir Mhóir (primary school), St. John's SNS (primary school), Carrysfort Mixed National School (primary school), Arklow CBS (secondary school) and Glenart College (secondary school). On this basis, the lands are suitably located to accommodate residential development, giving regard to their proximate distance to educational and social facilities, along with the centre of Arklow.

4.4 Servicing and Access

The lands are serviced and ready to accommodate residential development. Under the most recent planning application on the site (P.A. Ref no. 23/845), a Confirmation of Feasibility was obtained, in which it was stated that the water connection was feasible without infrastructure upgrade by Irish Water. It was noted that a possible network extension may be required depending on the location of the connection point. In respect of wastewater connection, it was stated that this was feasible subject to the completion of the Arklow Wastewater Treatment Plant. A network extension may also be required depending on the location of the connection point.

In terms of wastewater, services are already within our client wider landholding, serving the Emyvale estate. There may also be other potential connection opportunities in adjoining residential developments. A PCE enquiry will be made to Uisce Eireann in advance of lodging a planning application but with the new Arklow Wastewater Treatment Plant operational, there are no capacity issues anticipated. Accordingly, the site is serviced and capable of accommodating residential development.

In terms of site access, there is an existing pedestrian and vehicular access to the landholding from the Johnstown Road to the south of the site. The Lamberton Avenue / Woodlands Park is an attractive walking trail which is located to the north of the site. Our client would be willing to explore opportunities for connecting into this walking trail to further facilitate pedestrian access to the site.

4.5 Biodiversity

The description of the northern part of the subject lands in the Draft LPF is refuted by our clients, and in particular that the lands have been in continuous woodland cover since the early 19th Century. The area of the site joining Lamberton Avenue and the M11 motorway was a commercial forest consisting mainly of pine and spruce trees planted approx. 90 years ago. This

coniferous forest was clear felled by Coillte c 1999 / 2000 (under licence) and prior to the lands being put on the market.

The only trees present are on the site boundary's which still stand to this day.

The remainder of the lands have been in agricultural use, farmed fields.

We also note that Coillte have committed to managing Glenart Wood to the north, comprising c160ha of lands, for ecological gain and biodiversity enhancement.

As part of an upcoming planning application, our client proposes to set aside a buffer to the west of the site that is to be left undeveloped. This area measures c. 3.6 ha (9 acres). This is currently zoned for 'Open Space' under the existing LAP and is proposed to be zoned for 'Natural Areas' (OS2) under Variation no. 5.

Furthermore, lands which are currently zoned for 'New Residential' under the 2018 LAP have been reduced in area, with a proportion of the previously zoned residential lands replaced with the 'Natural Areas' OS2' designation. As mentioned previously, an LRD is being prepared for the site and an ecological assessment and AA screening will be undertaken as part of this process. To date, bat and badger assessments have been completed as well as an arborists report to inform the design and layout of the proposed LRD.

Finally, our clients have noted that where these lands are not zoned for residential development in the final Arklow LFP, the owners will incorporate the lands into the wider farm holding, connected via the M11 overbridge at the north of the site.

The Green Infrastructure Audit (accompanying the Draft Arklow LFP), identifies a 25m riparian buffer zone at the east of the subject site. Section 3.0 of The Green Infrastructure Audit states that *"25m riparian buffer zones, where largely undeveloped will generally be specifically protected via an appropriate 'OS' land use zoning objective, as per CPO 17.26 of the Wicklow County Development Plan 2022-2028."*

The proposal to include a riparian buffer at this location is not warranted. A riparian buffer is a vegetated area of land adjacent to a body of water, such as a stream, river, or lake, that helps to protect the waterway from adjacent land use. These buffers filter pollutants, prevent erosion, and provide habitats for wildlife. They are a key tool for improving water quality and ecological health.

However the body of water at this location is a man-made shore running along the boundary of the Woodlands estate. The shore collects surface water run off from the field.

Our clients have confirmed that this shore remains dry for most of the year, with the image below from October 17th 2025 showing the shore dry.



Figure 5 Left - Dry shore within former Coillte site; Right - dry shore along Woodlands boundary (Date Taken: October 17th 2025)

4.6 Site History

There have been several planning applications on our client's lands over the past 3 years – P.A. Ref no. 23/447, 23/796 and 23/845. Permission was granted for 6 no. residential units under P.A. Ref no. 23/447. Permission was refused of 21 no. units and 95 no. units, respectively, under P.A. Ref no. 23/796 and 23/845. In both applications, the refusal reasons related predominantly to issues regarding layout and design, or a lack of information being provided.

An LRD application is currently being prepared for the subject site, and this will address the refusal reasons outlined in P.A. Ref no. 23/796 and 23/845. Please refer to letter from Molloy Architecture enclosed in relation to same.

Giving regard to the fact that our client has been actively submitting planning applications on the site over the past 3 years, strong consideration should be given to reinstating the 'New Residential' zoning as per the Arklow and Environs Local Area Plan 2018. Furthermore, we consider that these lands should be zoned 'RN1 – New Residential Priority 1', given that our client has actively been preparing and submitting residential planning applications on the site.

5. Conclusion

The purpose of this submission is to request that the lands at Ballyraine Upper, Arklow (c7.5ha) are rezoned for 'New Residential – Priority 1' under the Proposed Variation No. 5 of the Wicklow County Development Plan / Draft Arklow Local Planning Framework.

It is considered that the lands should be rezoned on the following grounds.

- The zoning of the subject lands aligns with national policy context in providing residentially zoned lands contiguous to the existing built up area.
- These lands are sequentially appropriate and are an infill site between existing residential and the M11 Open space.
- The lands comply with the principles of compact settlements and can make more efficient use of existing infrastructure already serving the area.
- Capacity is available for both water and wastewater.
- Additional residentially zoned land should be considered giving regard to existing housing targets for Arklow, as well as likely revisions resulting from the NPF Implementation: Housing Growth Requirements targets for the County as a whole.
- The lands are currently zoned for residential purposes under the adopted Development Plan and the existing Arklow and Environs Local Area Plan 2018-2024. Therefore, there has been a longstanding history of residential zoning on the land.
- There is similarly a longstanding history of residential planning applications on our client's lands. While development ceased in 2008, our clients re-ignited the site when it was clear the Arklow Wastewater plant would become operational.
- An LRD application is currently being prepared for the subject lands and a Section 247 Pre-Planning Request submitted shortly. This application will take into account and address the previous refusal reasons and shortfalls of application made in 2023.
- The lands are located within convenient walking and cycling. distance of the town centre of Arklow, nearby schools, and sports facilities.
- The lands are serviced and are therefore ready to accommodate residential development.
- The lands do not hold any significant biodiversity value to warrant their de-zoning and sterilisation as Open space lands. Further ecological assessments will be undertaken on the lands to support the proposed LRD application.

Please do not hesitate to contact us if you require further information in the assessment of this submission.

Map of Site

