

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

Who are you:	Agent
Name:	Elizabeth Cannon
Reference:	ARKLPF-134302
Submission Made	November 12, 2025 1:45 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.3 Housing Development
- B.9 Zoning & Land Use

Maps:

- Land Use Map
- Key Green Infrastructure Map

Appendices:

- Draft Local Transport Plan
- Green Infrastructure Audit

Maps:

Please find attached a submission on behalf of Elizabeth Cannon for her lands at Ferrybank, Arklow

Upload a File (optional)

Elizabeth Cannon Ferrybank Variation No 5 Submission.pdf, 1.26MB

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 Ferrybank, Arklow, Co. Wicklow

A Chara,

In relation to the above, we have been engaged by the homeowner, Elizabeth Cannon, Ferrybank, Arklow, Co. Wicklow to prepare a submission on the preparation of the Local Planning Framework for Arklow and in particular the zoning of their home at Ferrybank, Arklow, Co. Wicklow.

1. Introduction

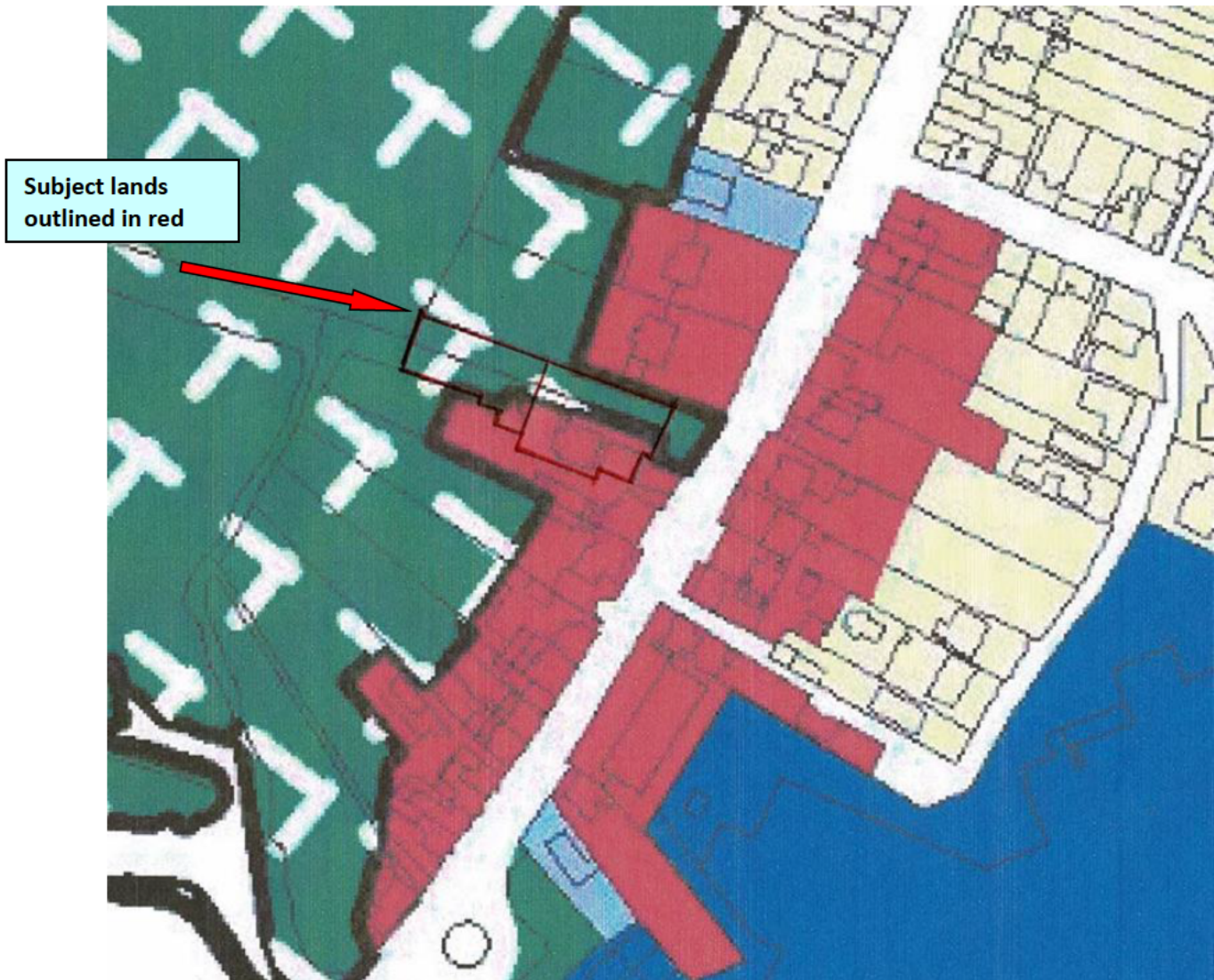
The applicant's home [REDACTED] and her daughter's home [REDACTED] are located at Ferrybank, Arklow and while separate properties, they are clustered together within the same residential site boundaries.

Under the 2018-2024 Arklow Local Area Plan, the subject lands are presently zoned TC, "Town Centre", and OS2, "Open Space"

(TC) Town Centre zoning allows *“To provide for the development and improvement of appropriate town centre uses including retail, commercial, office and civic use, and to provide for ‘Living Over the Shop’ residential accommodation, or other ancillary residential accommodation. ”*

(OS2), Open Space allows *“To protect and enhance existing open, undeveloped lands.”*

These zonings bear no relevance to the historical or existing use of the site and actually impede future development to their home’s contrary to proper planning and sustainable development.



2025-2028 Arklow Local Land Use Map

The draft Arklow Local Planning framework 2025-2028 now proposes that these lands continue to be split between these two very different zoning matrices of,

TC: Town Centre

“To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.”

&

OS2: Natural Areas

“To protect and enhance existing open, undeveloped lands.”

The proposed TC zoning relates only to the buildings and the OS2 zoning relates to the remaining garden area, literally dividing the site down the middle leaving no land left to ever extend their homes, sterilising the gardens and having a detrimental impact on the value of their homes.

While the homeowner believes the site is “existing residential”, to keep with the surrounding zoning of their neighbours in the immediate locality, **the landowner requests that these lands are now all zoned as Town Centre** which is in keeping with the existing zoning and permits a flexible and positive approach to future and sustainable development.

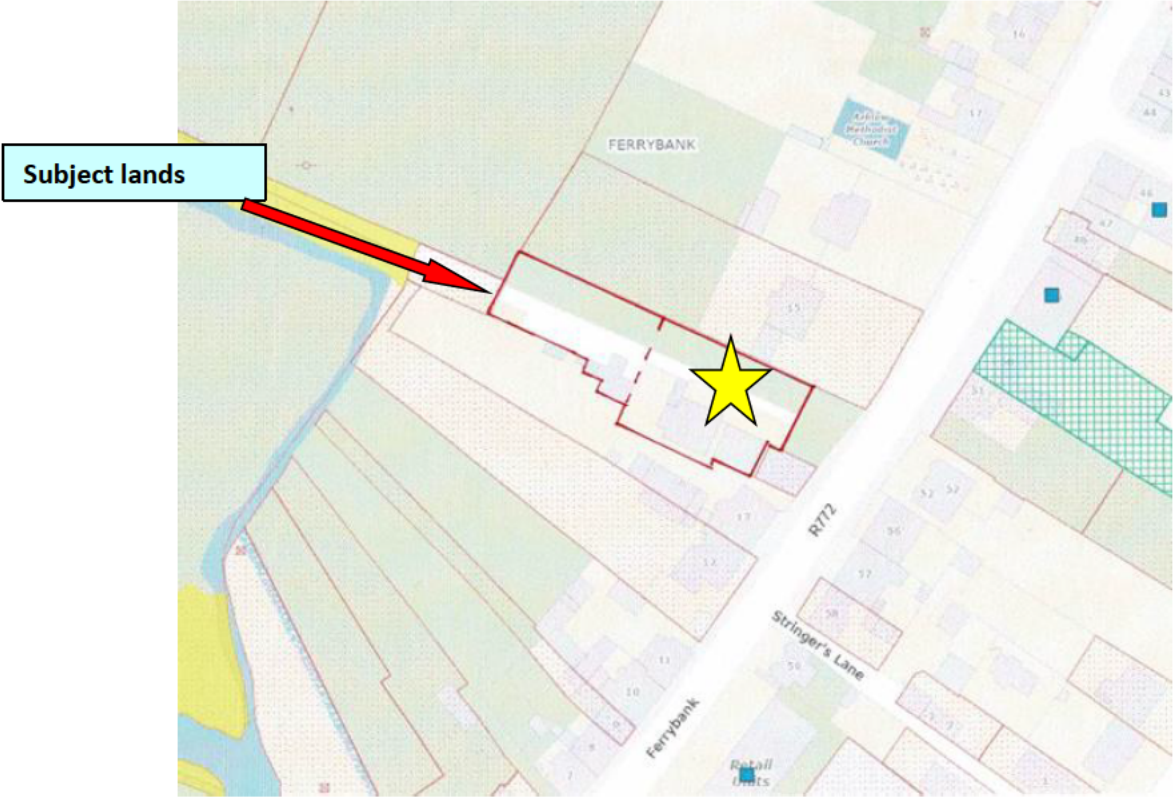
This submission will now set out the reasons and justification for the lands to be zoned “TC- Town Centre”

2. Site Location

The 0.18-hectare residential site comprising two homes is located to the north of the Avoca River at Ferrybank Arklow. The site borders a carpark on Ferrybank to the east, residential homes to the south, the Arklow Marsh to the west and a doctor’s surgery to the north.



Site Location (Google Maps)



Subject Site @ Ferrybank, Arklow

3. Planning & Zoning History

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

PRR: 14/2030

Permission was **Granted** for renovation and extension to the rear of their existing home.

PRR: 21/2548

Permission was **refused** for outline permission for a new dwelling

Arklow Town Development 2005-2011

Under the 2005 – 2011 Arklow Town Development Plan, the subject site was zoned “Existing Residential “.

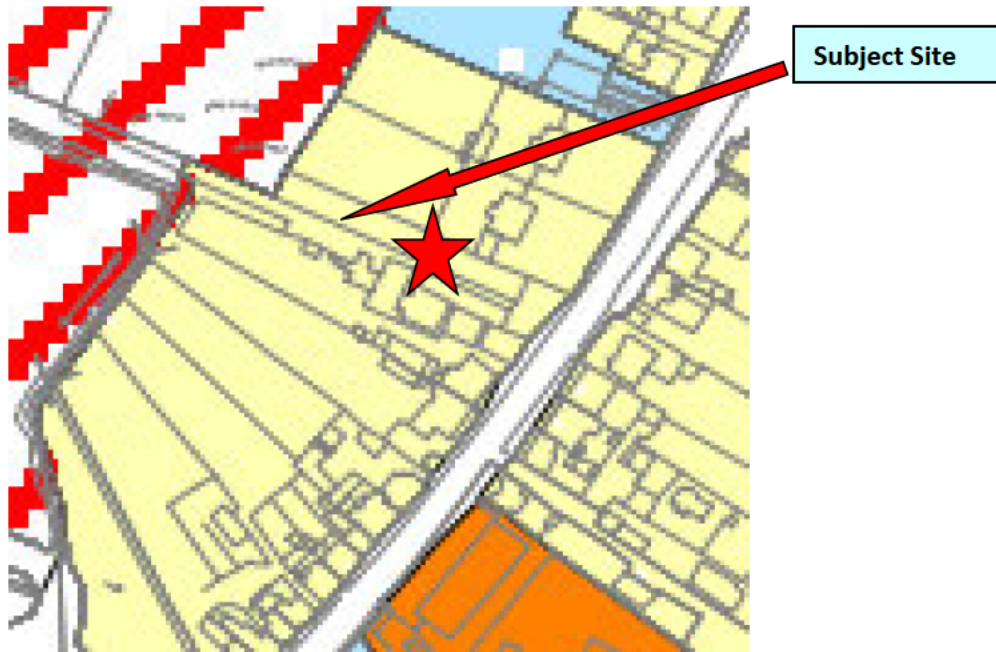


2005-2011 land use zoning map

This zoning was in keeping with the historical and existing use of the subject lands as residential.

Arklow Environs Local Area Plan 2011-2017

Under the 2011 – 2017 Environs Local Area Plan, the subject site was zoned “ Existing Residential “.



2011-2017 land use zoning map

This zoning was in keeping with the historical and existing use of the subject lands as residential.

Arklow Environs Local Area Plan 2018-2024

Under the 2018 – 2024 Environs Local Area Plan, the subject site was re-zoned as “TC – Town Centre” & “OS2, Open Space”



2018-2024 land use zoning map

Please note the following:

- The rezoning of the subject lands in 2018 was done without the knowledge of the landowners.
- It is highly unusual for a strip of land to be omitted and zoned (OS2) so significantly different along a section of development land. It cannot be deemed a cartography error as two similar access lanes further to the north on Ferrybank and at Briggs Lane were zoned the same as the surrounding pattern of land use.



2018-2024 land use zoning map

- The landowner has indicated that at the time of the preparation of this development plan, there was public pressure to have access to the marsh through their property. The Arklow Flood Relief Scheme was also still in design stage and subsequently the 'OS2' zoning was introduced to this portion of land.

Arklow Environs Local Area Plan 2025-2028

Under the 2025 – 2028 Arklow Local Area Framework, it is again proposed to divide the subject site into two separate land use zones,



Draft Zoning @ Ferrybank, Arklow

TC: Town Centre

"To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use."

&

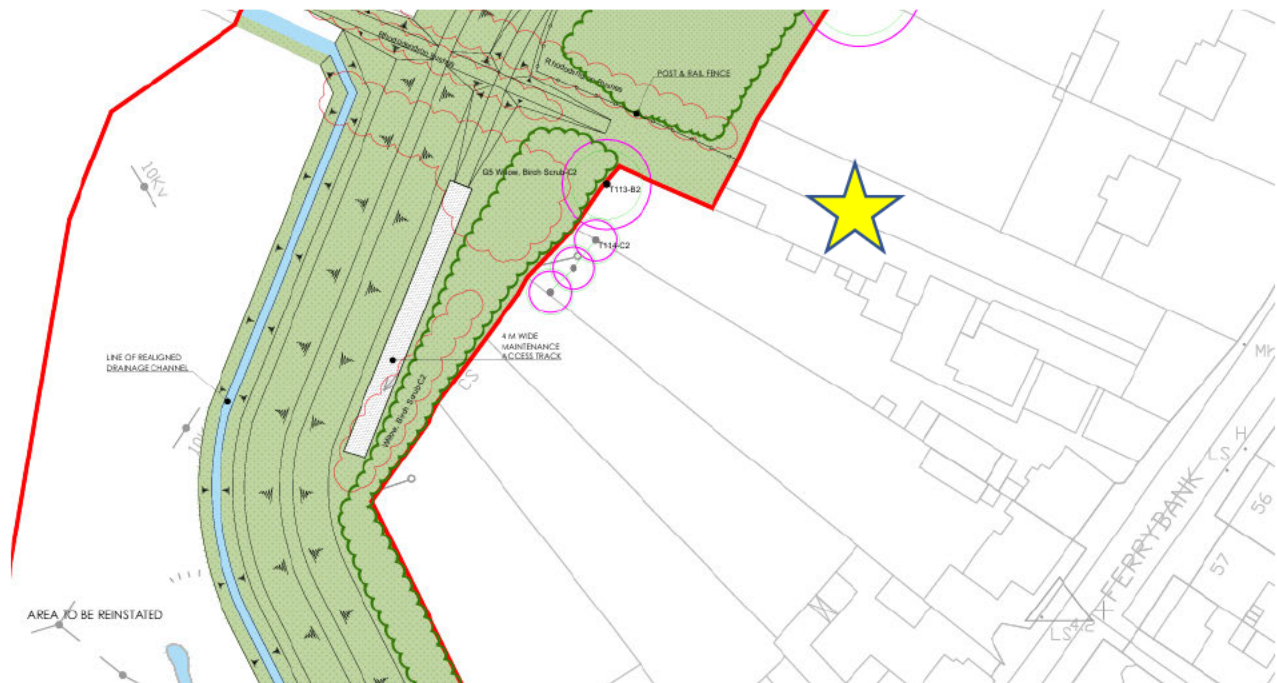
OS2: Natural Areas

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

Please note the following:

- The splitting of the small narrow site down the middle leaving no land left to ever extend their homes while sterilising the gardens is contrary to proper planning and sustainable development.

- The location of the land in a built-up suburban area forming a residential site should never have been split and zoned open space in the last development plan and with the flood relief scheme design now finalised and alternative marsh access introduced, all the subject lands should be re-zoned as one.
- We note that the 2 access lanes to the Marsh further to the north at Ferrybank and Briggs Lane are again not zoned open space but “Existing Residential” The landowners land is private property with no public access permitted while both these lanes are public serving several residential properties so if any lanes should be zoned open space, it should be these public access lanes.
- We note that the public car park is also zoned ‘OS2’ which is at complete odds with the zoning principle.
- It must be noted that Arklow Flood Relief Scheme has been approved and the proposed 3-metre-high embankment is located behind the subject lands to the west and provides both flood protection to the lands and *“A protection buffer zone of 20m within which no development or recreational activities are carried out should be applied to Arklow Marsh”* as per the Arklow Marsh Protection Report (May 2025)



Arklow Flood Relief Embankment

4. National Planning Policy

The subject lands are located within the suburban built-up environment of Arklow and it is Government policy that a positive and flexible approach is taken to zone these lands so development on serviced land is readily available.

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.

The National Policy objective 20 states,

"In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."

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"

The National Policy objective 43 states,

"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."

The National Policy objective 45 states,

"Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development"

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."

Applying the above policies should entail that the subject lands are all zoned “TC – Town Centre” as they achieve all the above criteria .

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 3 states that,

*“ It is a policy and objective of these Guidelines that **planning authorities should use all available means to ensure that the objectives of these Guidelines are incorporated within development plans as quickly as possible through the variation of the current adopted development plan.** Where a planning authority is undertaking a development plan review under the Act of 2000 or preparing a new development plan under the Act of 2024, a parallel process of varying the current adopted development plan, as appropriate, should be undertaken. The policies and objectives of these Guidelines should not be reflected in Local Area Plans without also being reflected within the relevant development plan.”*

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”

5. 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.

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. “*

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 was for many years zoned 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 5-10 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 lands meet 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 so the lands should be zoned Town centre in their entirety.

6. 2025-2028 Arklow Local Planning Framework

Under the draft 2025-2028 Arklow Local planning framework, the subject site is zoned both “TC, Town Centre” & “OS2, Natural Area.”

TC: Town Centre Objective

“To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.”

The local Planning Framework further describes Town Centre as,

“To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasis on regeneration, infill town and historic centre conservation; ensuring priority for public transport where applicable,

pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric."

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

- *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.*

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.*

While the landowner has no intention or desire to develop this land, the national and local policies put forward here show that the land should **NOT** be zoned OS2 and it must be accepted that the zoning of these lands for "Town Centre" use is in accordance with the sequential and proper planning and sustainable development of the area.

Under the draft 2025-2028 Arklow Local planning framework, a large portion of the subject site is zoned,

OS2: Natural Areas

“To protect and enhance existing open, undeveloped lands.”

The local Planning Framework further describes OS2 as,

“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.”

Firstly, the subject lands are private gardens and cannot be described as any of the above. While their land borders the Arklow Marsh to the rear, there is no reasonable explanation for the zoning to continue right through the site to the public road at odds with all the other properties in this area and their zoning.

We note that the site has been assessed as part of the ‘Arklow Town Marsh & Environs’ in the 2025 Green Infrastructure Audit Report. This report has been prepared on a desktop study that is incorrect and its conclusion to zone a portion of the site as OS2 has a detrimental impact on the proper planning and sustainable development of the site.

The report includes the subject lands as part of the overall open space to this area and notes,

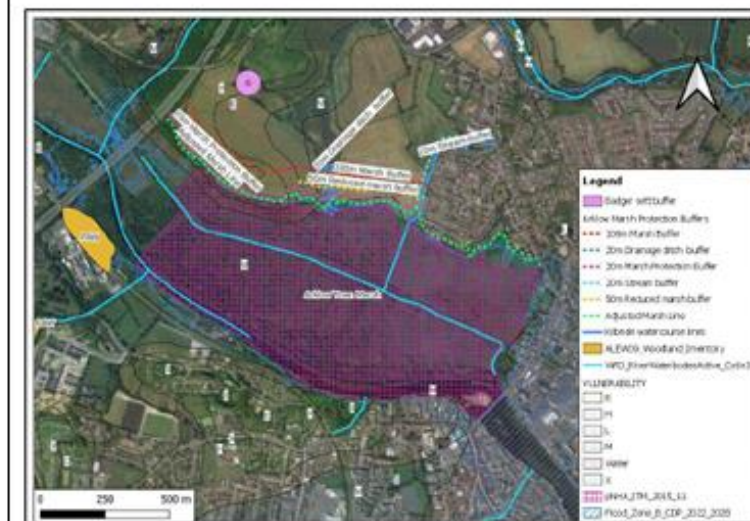
“In relation to backlands to the rear of properties west of the R772 at Ferrybank, zoned RE ‘Existing Residential’ and LSS ‘Local Shops and Services’, flood risk is apparent throughout the area. It is considered appropriate that the precedent established in the last plan of OS2 zoning to backlands just south of this area be extended, providing an extended buffer to the east of the Marsh.”

4.0 Land Use Zoning assessment & recommendations with respect to Green Infrastructure assets

Location	Arklow Town Marsh & Environs
Description	Proposed Natural Heritage Area on northern banks of Avoca River and adjacent lands, including a 100m buffer from the northern boundary of the marsh, backlands of properties at Ferrybank, and watercourse buffers.
Map of GI asset	Land Use Zoning Arklow LAP 2018  OS2 'Passive Open Space', Unzoned pNHA, MU 'Mixed Use', small areas of LSS 'Local Shops & Services', CE 'Community & Education' and RE 'Existing Residential' along the eastern boundary.
Key considerations impacting future zoning	Designated site (pNHA), previous zoning, Flood Risk, Arklow Marsh Protection Report May 2025

Assessment & Recommendation for New LPF

The Arklow Marsh Protection Report advises a 100m buffer north of the adjusted Marsh Line, as indicated by the red line below. This area is shown as part of the GI asset in the map of the site above (left).



Please note the following:

- The subject lands represent the landowners garden and before 2018 was zoned as residential land and the above comment highlights that the proposed plan has just followed on from 2018 erroneous mapping.
- The approved Arklow Flood Relief Scheme embankment to run behind all the houses along Ferrybank eliminates any future flooding concerns.
- The flood embankment works themselves will provide a physical buffer to the east of the Marsh and will protect, enhance and manage the undeveloped lands

As a result, the subject lands form no part of the Arklow Marsh and environs, is protected by the flood embankment and this also provides the required buffer zone between development land and the marsh.

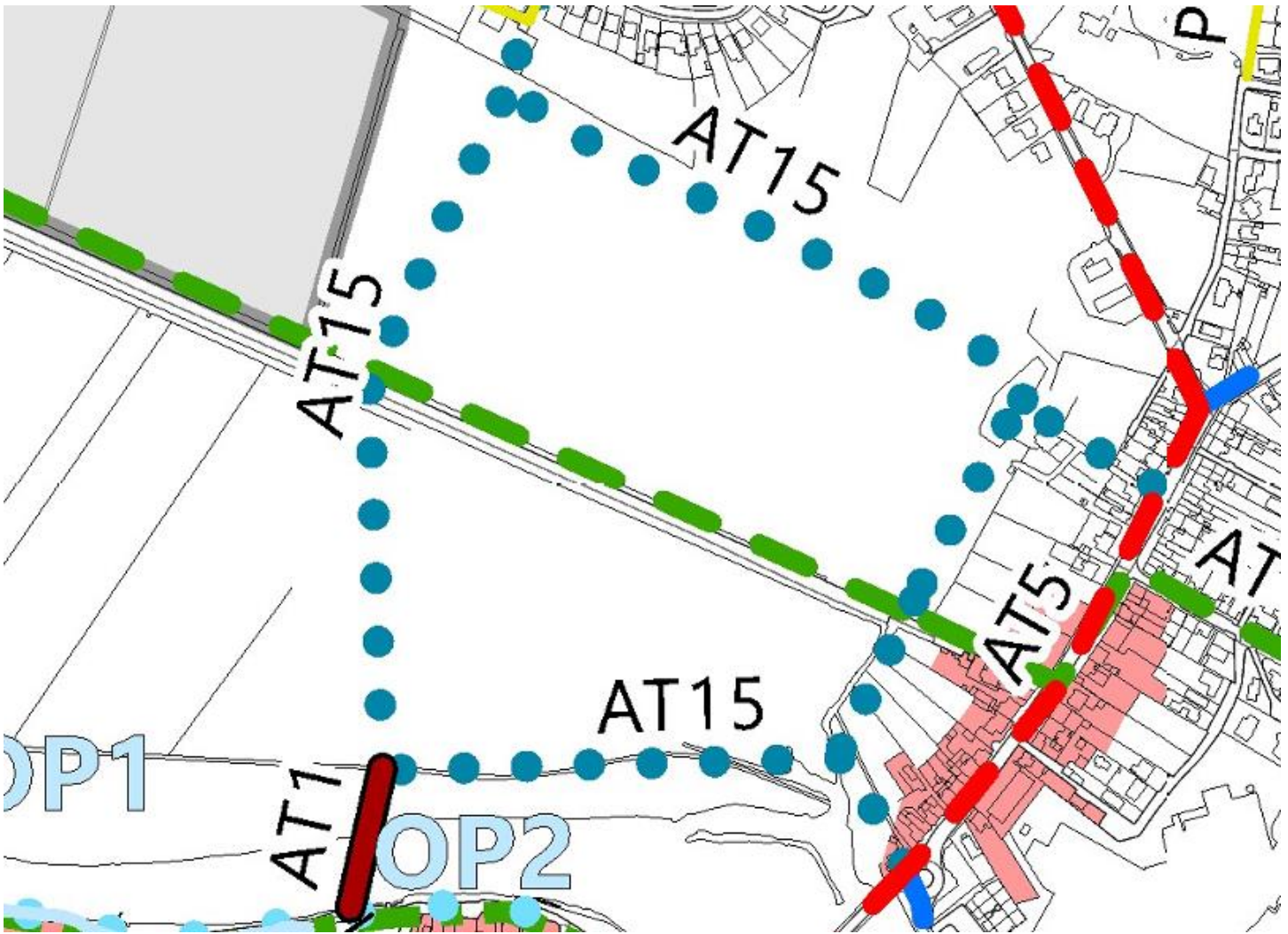
Active Travel Strategy

The proposed Arklow Local Area Framework active travel strategy under Objective ARK72 states that,

“To overcome overreliance on the Nineteen Arches Bridge and improve pedestrian and cycle connectivity between the north and south of the river, by promoting and supporting the development of;

- *The Kilbride Pedestrian and Cycling Bridge between the Avoca River Walk and Arklow Town Marsh/Ferrybank, including associated east-west pedestrian links connecting this crossing with Ferrybank / Dublin Road (short/medium term), the River Avoca Industrial Park (long term) and Arklow to Laragh Greenway (long term) (AT 1, AT 15, AT 19, CY 2)*

It must be highlighted that AT19 (Arklow to Laragh Greenway) and AT15 (Marsh Loop) are indicated to traverse through the subject lands. The landowners have never heard of these proposals until now and can confirm that as it is private property and their personal private garden areas, it will not be considered by them.



2025-2028 Active Travel Strategy Map

Please note the following:

- The proposed access to the walkways is through private lands and gardens and so is not available.
- The construction of the flood relief scheme works provides alternative access via the Bridgewater roundabout or over the proposed pedestrian bridge to AT1 all on public lands.
- It must be noted that the proposed AT15 pathway through the Arklow Marsh is at complete odds with protection, enhancement and management of the undeveloped, protected natural heritage Marsh and its zoning.

7. Conclusion

The landowner requests that these lands are now all zoned as **Town Centre** which is in keeping with the existing zoning and permits a flexible and positive approach to future and sustainable development.

- The proposed zoning bears no relevance to the historical or existing use of the site and actually impedes future development to their home's. The splitting of the small narrow site down the middle leaving no land left to ever extend their homes while sterilising the gardens is contrary to proper planning and sustainable development.
- The location of the land in a built-up suburban area forming a residential site should never have been split and zoned open space in the last development plan and with the flood relief scheme design now finalised and alternative marsh access introduced, all the subject lands should be re-zoned as one.
- It must be noted that Arklow Flood Relief Scheme has been approved and the proposed 3-metre-high embankment is located behind the subject lands to the west and provides flood protection to the lands.
- The proposed access proposed through the active travel strategy walkways is through private lands and gardens, would detrimentally harm the privacy, security and residential amenities of two homes and so is not available.
- While the landowner has no intention or desire to develop this land, the national and local policies put forward here show that the land should **NOT** be zoned OS2 and it must be accepted that the zoning of these lands for "Town Centre" use is in accordance with the sequential and proper planning and sustainable development of the area.

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