

Planning Report

For a Proposed Large Scale Residential Development

At Kilbride, Arklow, County Wicklow

Prepared by MCG Planning

on behalf of

Certain Assets of Dawnhill and Windhill Limited

May 2025

Our Ref 17115

CONTENTS

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INTRODUCTION	3
SITE LOCATION	6
PLANNING HISTORY	8
SUMMARY DESCRIPTION OF THE PROPOSAL.....	9
COMPLIANCE WITH CORE STRATEGY & LAP PHASING JUSTIFICATION	12
DESCRIPTION OF THE DEVELOPMENT	43
STATEMENT OF RESPONSE TO WICKLOW COUNTY COUNCIL LRD OPINION	69
PLANNING POLICY	80
CONCLUSION	156

INTRODUCTION

McGill Planning Limited, 9 Pembroke Street Upper, Dublin 2 is instructed by the applicant Certain Assets of Dawnhill and Windhill Limited, to submit this Large-Scale Residential Development Application in line with Section 32D of the Planning and Development (Amendment)(Large-scale Residential Development) Act 2001 for a proposed Large scale Residential Development (“the Proposed Development”) at a site in Kilbride, Arklow, Co. Wicklow. The details of the application are set out below:

The development will consist of the demolition of 3 no. structures on site including a 2-storey habitable house (total GFA 207 sq.m) and 2 no. sheds/outbuildings (c.580 sq.m). Closures of 2 no. existing entrances onto the Kilbride Road (L-6179). Construction of a new residential development and local centre comprising: 666 no. units (578 no. semi-detached and terraced housing (100 no. 2 beds, 317 no. 3 beds, 161 no. 4 beds) and 88 no. apartments and duplex apartments (24 no. 1 beds, 51 no. 2 beds and 13 no. 3 beds)). All residential units will have associated private open space facing north/ south/ east/ west. The proposal will also include a local centre (c. 2335 sq.m) comprising a creche (c.1,095sqm) with outdoor play area, 3 no. community/medical units (c.450 sq.m), and 3 no. retail units (c.790sq.m). Building heights within the development will range from one to five storeys.

The development will include streets, pedestrian/cycle links, open spaces/parks (with play areas) and will include amendments to the permitted open spaces and access road granted as part of the Phase 1/Character Area 1a development (WCC Reg. Ref.: 23/756 on the subject lands.

The development will also include a public boardwalk/bridge for pedestrians and cyclists from the development across Arklow Town Marsh and the Avoca River to the Arklow Riverwalk north of Arklow Town Car Park and the Town Centre, with the bridge element (and associated works) across the Avoca River constructed atop the concrete columns (debris traps) permitted as part of the Arklow Flood Relief Scheme (Planning Ref. ABP-310368-21).

All associated site development works, site reprofiling, infrastructural and drainage works, surface water attenuation and natural attenuation areas, connection to public services and utilities (including undergrounding of ESB lines), provision of substations, bin stores, bicycle stores, car and cycle parking at surface and undercroft levels, public lighting, landscaping and planting, public/communal/private open spaces and boundary treatment works. This development will form part of the designated Kilbride Action Area Plan AAP3.

The application has been proposed by a multidisciplinary team on behalf of Certain Assets of Dawnhill and Windhill Limited as set out in the table:

Company Name	Documents Prepared
McGill Planning Ltd	Planning Report
	EIAR
BKD / CCK / HOGAN Architects	Architectural Drawings
	Architects Design Statement
	Housing Quality Assessment
	Universal Design Statement
	Schedule of Accommodation
NMP Landscape Architects	Landscape Drawings
	Landscape Design Rationale
DOBA Engineering	Engineering Drawings

	Engineering Planning Report
	Site Specific Flood Risk Assessment
SYSTRA	Traffic and Transport Assessment
3DDB	Photomontages
Tree Management Services	Arborist Drawings
	Arborist Report
Altamar	AA Screening
	Ecology Note
Fallon Lighting	Public Lighting Drawing and Report

The report is divided into eight sections:

- Section 2 describes the site location and context.
- Section 3 details the planning history for the subject site
- Section 4 outlines details of the proposed development
- Section 5 sets out compliance with the Core Strategy and LAP Phasing Justification
- Section 6 provides a detailed description of the development
- Section 7 set out of the response to the S32B Pre- Planning meeting and WCC LRD Opinion
- Section 8 assesses the proposed development against national, regional and local planning policy
- Section 9 concludes the report

Development Statistics

Development Proposal	Statistics
Site Area	25.07ha (gross – area within red line boundary) 19.54ha net site area including all development 18.93ha net site area pertaining to residential development only (as defined by the Compact Settlement Guidelines 2024)
No. of residential units	666 no residential units <ul style="list-style-type: none"> - 578 Houses comprising: <ul style="list-style-type: none"> • 100 no. 2 beds • 317 no. 3 beds • 161 no. 4 beds - 88 Apartments comprising: <ul style="list-style-type: none"> • 24 no. 1 beds • 51 no. 2 beds • 13 no. 3 beds
Local Centre	<ul style="list-style-type: none"> • 3 no retail units • 3 no community/medical units • 1 no. creche
Density	35.2 units per hectare
Plot Ratio	0.30:1
Site Coverage	19.86%
Open Space	Public Open Space: 3.35 hectares (17.7%)
Car Parking	1,185 no. car parking spaces <ul style="list-style-type: none"> • 1,126 no. residential car parking spaces • 59 no. spaces for the local centre
Access	Vehicular/pedestrian/cyclist access provided from the Kilbride Road New pedestrian boardwalk and bridge over the Avoca River to Arklow Town centre.

SITE LOCATION

The site is located in the area of Kilbride on the northern side of the Avoca River in Arklow, Co. Wicklow. It is located within the development boundary of Arklow Town in the townland of Kilbride. The site is primarily on lands zoned mixed use within a larger area designated as Area Action Plan 3 lands in the Arklow and Environs Local Area Plan 2018 – 2024. Wicklow County Council approved an Action Area Plan for Action Area 3 on the 2nd of April 2019.

There is a small portion of the site, across which a pedestrian boardwalk is proposed, which includes the marsh lands and Avoca River. These lands are zoned Arklow Town Marsh pNHA. As set out in the LAP Chapter 10 *“The marsh is the principal wetland habitat in the area, providing an important flood control role and supporting a variety of plant and animal life, in particular reed species and bird life.* The proposed pedestrian boardwalk and bridge that traverses the marsh, will sit atop of the permitted debris traps to be installed as part of the permitted Flood Alleviation Works (ABP Reg. Ref. 310368).

The wider development site, which is identified under AAP3 and for which a masterplan is included within this application, measures c. 75.4 ha. It is zoned for *“mixed use”* with the objective *“to provide for mixed use development”* including 1,500 residential units along with local shops, a school and services.

The current proposal is to bring forward the site in two phases. The first phase of development, the subject of this application, will complete the first part of the new distributor road and access into the site along with 666 residential units on the site, the neighbourhood centre and a new pedestrian / cyclist access through the Arklow Town Marsh to the Main Street, and public open spaces. Phase 2 will deliver the remaining 750 no. residential units along with the sports facilities and the remainder of the road.

It is worth noting that three development, outside of this application site, two of which are part of the overall masterplan for the areas has recently been granted planning permission. The first is for a new school campus in line with the requirements of the Action Area Plan. The new school is accessed off the Kilbride Road and will provide part of the new regional link road (WCC Reg. Ref. 22/213). This will deliver a primary and secondary school.

Planning permission has also been granted for 84 no. units in the south east corner of the masterplan site, and will form part of the Character Area 1A. This permitted phase includes the regional link road, and spine road through the site, a new pedestrian and cycle link past the Marsh Sports Center into Avondale Crescent, along with public open space adjacent to the marsh.

The third permitted development is for the Arklow Flood Relief Works which were granted under ABP Reg. Ref 310368. This permission includes the debris traps within the Avoca River which the proposed boardwalk will join and sit on top of.

This application has been cognisant of all three of these planning permissions, and has been designed to accommodate the applications, and integrate appropriately with them.

Subject Site

The site as a whole is currently in agricultural use and slopes in a broadly north / south direction to the town marsh and Avoca River.

The Pyramid of Arklow; national monument, and its associated graveyard are located to the north of the ownership area but at a significant distance outside of the application site and the proposed new road. This pyramid has been well maintained over the years. There is also a surrounding external wall around the graveyard which is in varying condition.

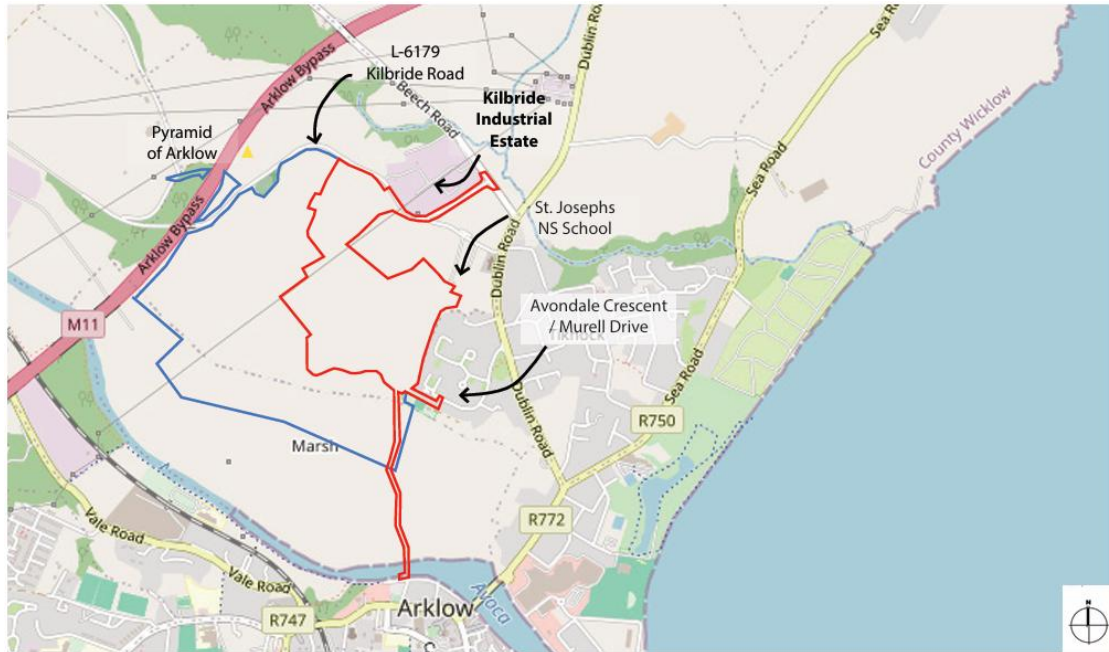


Figure 1 Site Location

There are hedgerows and trees on the site but there are no category A trees within the site and 10 category B trees. To the south of the site, there is an area within the Arklow Town Marsh pNHA (proposed Natural Heritage Area) across which the boardwalk is proposed. This pNHA is a non-statutory designation. There is also a small drainage ditch to the east of the subject site. The site is not located within a Conservation Area or an Architectural Conservation Area.

The site is located within close proximity to Wicklow town and is within the vicinity of 3 no. existing bus services which are operated by Bus Eireann. The routes include Wexford Town – Dublin Airport; Gorey – Dublin Airport and Redmond Square – Dublin Airport. Arklow Train station is approximately 2.5km from the development and allows users to commute towards Dundalk, via Dublin City Centre and also down to Rosslare Europort to the south of the river. It is also worth noting that Wexford Bus has received planning permission WCC Reg. Ref. 141234 for a Park and Ride facility (170 space car park) at the M11 interchange to the north of the site.

As set out in the Chapter 4 of the EIAR, which addresses social and community facilities in the area, there are 5 no. primary and 4 no. post primary schools within Arklow Town, of which St Joseph's National School is within the 10 to 15 minute walk of this site. There are also 11 no. creches within a 30-minute walk of the subject site and a further 5 no. creches outside of this radius.

The site is also within 20 minutes' walk/ 10-minute cycle of the Bridgewater Centre, and the associated facilities in that area which include the cinema, restaurants, shops as well as a skate park, while Arklow Bay Hotel is within 15 minutes' walk/ 5-minute cycle of the site. Arklow Main Street is about 25 minutes' walk/ 10-minute cycle from the site using existing and permitted routes via Avondale Crescent, and will be c. 10 minutes walk once the boardwalk is constructed. The main street has a wide range of shops, restaurants, and community amenities including library, HSE services, and GP and other services.

PLANNING HISTORY

McGill Planning have carried out a review of the planning history of the site. The site has been subject to a number of previous planning application since 1998. The planning history for the site is set out in the table below.

Registration details	Description
Masterplan area	
ABP Reg. Ref.: 305175-19 Application Date:15/10/19 ABP Decision: Pre - app	A pre-application consultation request for a Strategic Housing Development system for 759 no. residential units, retail units, a creche and associated site works.
Sites within wider AAP Area	
WCC Reg Ref: 23/756 Application date: 06/10/23 ABP Reg. Ref.:319604 Decision: Granted, by both WCC and ABP	86 no. residential units, alterations to Kilbride Road (L6179) to provide a section of the new road into the wider Kilbride Masterplan lands with vehicular, pedestrian and cycle access provided; a new dedicated pedestrian and cyclist access will also be provided connecting via the Marshland's sports club lands, and through Avondale Crescent to the Dublin Road. Please note due to a Further Information Response the permitted number of units is 84
WCC Reg Ref: 22/1006 Application date: 16/09/22 Decision: Refused	98 residential units along with public open space, the new distributor road and a temporary wastewater treatment plant on a site located to the north of the subject application site, opposite the new education campus. *This is discussed in further detail below
WCC Reg Ref: 22/213 Application date: 8/03/22 Decision: Grant	Permission was granted subject to conditions for the provision of a new educational campus and a new link road. This includes the development of two schools, a 16 classroom primary school and a three storey post primary school along with associated parking, pitches, and play areas. This would provide for c. 480 pupils in the primary school and c. 400 pupils in the post primary school.
Relevant permissions within the wider area	
ABP Reg Ref 302556 Decision: Grant	Arklow Waste Water Treatment Plant is now operational following its completion in accordance with this planning permission.
ABP Reg Ref 310368 Decision: Grant	The Arklow Flood Relief Works were granted permission under ABP Reg Ref 310368 and includes debris traps within the Avoca River.

SUMMARY DESCRIPTION OF THE PROPOSAL

The proposed residential development will comprise a residential led mixed use development. As set out in the Statutory Notices the proposal is as follows:

The development will consist of the demolition of 3 no. structures on site including a 2-storey habitable house (total GFA 207 sq.m) and 2 no. sheds/outbuildings (c.580 sq.m). Closures of 2 no. existing entrances onto the Kilbride Road (L-6179). Construction of a new residential development and local centre comprising: 666 no. units (578 no. semi-detached and terraced housing (100 no. 2 beds, 317 no. 3 beds, 161 no. 4 beds) and 88 no. apartments and duplex apartments (24 no. 1 beds, 51 no. 2 beds and 13 no. 3 beds)). All residential units will have associated private open space facing north/ south/ east/ west. The proposal will also include a local centre (c. 2335 sq.m) comprising a creche (c.1,095sqm) with outdoor play area, 3 no. community/medical units (c.450 sq.m), and 3 no. retail units (c.790sq.m). Building heights within the development will range from one to five storeys.

The development will include streets, pedestrian/cycle links, open spaces/parks (with play areas) and will include amendments to the permitted open spaces and access road granted as part of the Phase 1/Character Area 1a development (WCC Reg. Ref.: 23/756 on the subject lands.

The development will also include a public boardwalk/bridge for pedestrians and cyclists from the development across Arklow Town Marsh and the Avoca River to the Arklow Riverwalk north of Arklow Town Car Park and the Town Centre, with the bridge element (and associated works) across the Avoca River constructed atop the concrete columns (debris traps) permitted as part of the Arklow Flood Relief Scheme (Planning Ref. ABP-310368-21).

All associated site development works, site reprofiling, infrastructural and drainage works, surface water attenuation and natural attenuation areas, connection to public services and utilities (including undergrounding of ESB lines), provision of substations, bin stores, bicycle stores, car and cycle parking at surface and undercroft levels, public lighting, landscaping and planting, public/communal/private open spaces and boundary treatment works. This development will form part of the designated Kilbride Action Area Plan AAP3.



Figure 2 Proposed site layout plan

As set out above the site forms the first phase of a larger masterplan development as set out in AA3 of the Local Area Plan. The masterplan layout indicated the delivery of 1,500 residential units in a variety of different typologies, and sizes. The delivery of the school site. The completion of the distributor road and a neighbourhood centre. Along with a new active open space area providing 4ha of this space and a series of attractive open space throughout. It also provides an attractive setting for the Arklow Pyramid and graveyard associated with same.



Figure 3 Overall AAP3 Masterplan Layout

COMPLIANCE WITH CORE STRATEGY & LAP PHASING JUSTIFICATION

CORE STRATEGY COMPLIANCE

On 21st January 2025, Wicklow County Council issued an LRD Opinion in accordance with Section 32D of the Planning & Development Act, 2000, as amended, in relation to a Large Scale Residential Development proposal at Kilbride, Arklow, Co. Wicklow.

The LRD proposal, as submitted at Stage 2 was for 750 residential units within along commercial, community, medical uses and a creche and all associated works.

The LRD Opinion stated that *“in accordance with Section 32D (2)(b) of the Act, the Planning Authority considers that the following matters need to be addressed by the relevant documents, which could result in the documents constituting a reasonable basis on which to make the application.”*

Item A of the matters listed stated the following:

“Core Strategy:

Justification of the development to show that given permitted development that the development would not undermine/materially contravene the Core Strategy for Arklow as set out in the County Development Plan 2022-2028”

This section outlines how the current LRD planning application for 666 residential units on the subject lands at Kilbride, if permitted will not undermine or materially contravene the Core Strategy of the Wicklow County Development Plan with regards to Arklow.

Revised LRD Proposal

The current proposal as submitted for planning is for 666 units, comprising 578 no. housing (100 no. 2 beds, 317 no. 3 beds, 161 no. 4 beds) and 88 no. apartments and duplex apartments (24 no. 1 beds, 51 no. 2 beds and 13 no. 3 beds).

The quantum of residential development has been reduced from LRD Stage 2 (Opinion) when a draft scheme of 750 units was proposed. The reason for the reduction is that in the interim, on 5th February 2025, Phase 1a of the development comprising 84 houses and duplex apartments (amended from 86 no. units) has separately received planning permission from An Bord Pleanála (following 3rd party appeal of the original Wicklow CoCo grant)– Ref. ABP-319604-24 (WCC Ref. 23/756) refers.

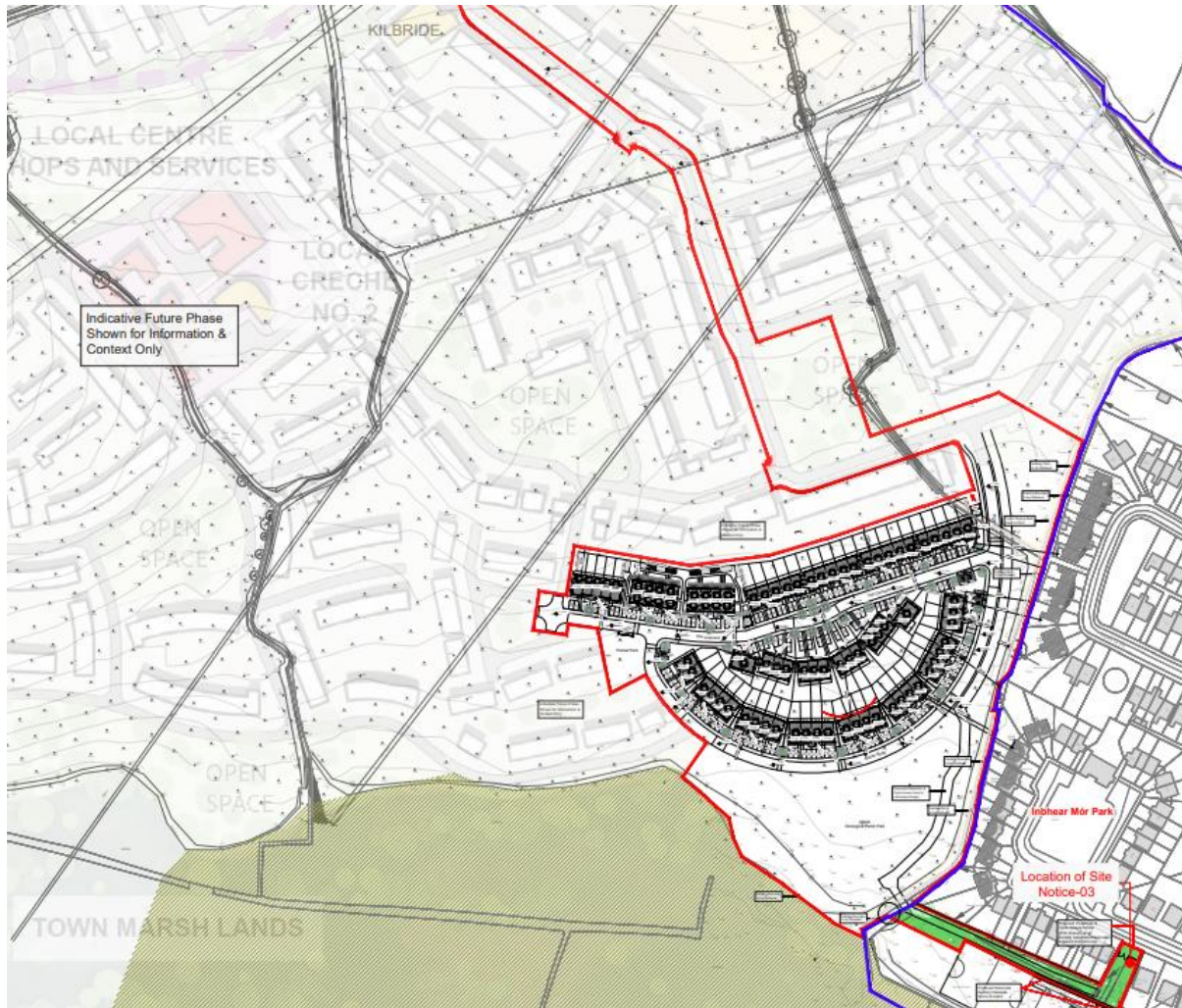


Figure 4 Permitted Site Layout for Kilbride Phase 1 WCC Ref. 23/756

The ABP Grant of Permission was informed by the ABP Inspector's Report (dated 23rd December 2024). In assessing the Principle of the Development in relation to the Core Strategy and the Settlement Strategy of the County Development Plan, the report (paragraphs 7.3.1 to 7.3.5) states the following:

"..the Core Strategy and Settlement Strategy identify Arklow as a Self Sustaining Growth town; these towns are targeted for growth rates of 25%-30%. An allocation of 790 units is identified to Q2 2028 for Arklow, and a further 161 units to Q4 2031.

I have reviewed planning permissions granted since the adoption of the CDP and note application 24/325 for 476 units (granted by Wicklow County Council on 12/12/2024) as the only significant development since the adoption of the CDP. Therefore, there remains capacity as per the Core Strategy for the number of units within the proposed development. "

"The Core Strategy Table A of the CDP for LAP Towns identifies that there is a surplus of zoned lands in Arklow to facilitate targeted growth, which will be addressed in the next LAP. However, it indicates that the built up area has a capacity to cater for 40% of targeted growth, therefore lands outside the built up area will require to be considered for zoning in the next LAP.

The development location meets the requirements of CPO 6.19 of the CDP in relation to phasing and sequential growth: it is located adjacent the existing built up urban area and provides key/transport

infrastructure (access point, road, cycle/footpath) in conjunction with development (see 7.5 below for further detail). It also responds to the permission granted for the school campus and can integrate with the CDP objective for the provision of a third interchange on the Arklow bypass. Noting the statutory plan context for the site, the consistency with the CDP provisions relating to Arklow, and consistency with national policy context set out above in terms of the NPF and S28 Guidelines, I am satisfied that the principle of development on the site would not conflict with the CDP, and therefore is acceptable."

Core Strategy

The Wicklow County Development Plan, 2022-2028, includes, in Chapter 3, a 'Core Strategy' which demonstrates that the development objectives in the plan are consistent, as far as practicable, with national and regional development objectives set out in the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region.

The Core Strategy sets out a settlement hierarchy for the County and includes the projected population growth of each town in the hierarchy. The Core Strategy is required to be "sufficiently specific" in setting population targets and housing requirements for settlements.

The Core Strategy quotes the original National Planning Framework (NPF), 2018, which establishes a population growth target for the Eastern and Midlands Region (including Wicklow) of 490,000-540,000 additional people between 2016 and 2040.

For Wicklow County this equated to a population growth of between 160,500 – 164,000 by 2031 (minus the additional MASP allocation for Bray), and a housing target of 8,467 between Q3 2022 and Q2 2028, the life of the County Development Plan.

The allocation to Arklow for the 6 year life of the Development Plan to Q2 2028 is 790 units. Apart from Bray and Wicklow-Rathnew this is the largest housing growth projection for any town in the County and would equate to an average housing delivery of 132 units per annum.

Revised National Planning Framework Plan (NPF) 2025

Under the Revised NPF (February 2025), the Eastern and Midlands Region is targeted to increase by an additional 690,000 people between 2016 and 2040, an increase of between 28% and 40% from the target set in the original NPF (490,000 - 540,000 additional people).

An updated 'Implementation Roadmap' will be published in due course to outline county level population projections.

However, at this stage for the purposes of this report, applying the conservative 28% increased regional growth rate pro rata to Wicklow would then indicate a revised 2031 population target for the County of between 205,440 and 209,920.

This represents an increase in County population target of between 44,940 and 45,920 by 2031 from the current Core Strategy target (160,500 to 164,000).

Using an average household size of 2.4 that would equate to an additional 18,725 to 19,133 units required to be provided in the County by 2031 to meet the revised population target.

Settlement Strategy

Arklow is designated a Level 3 “Self-Sustaining Growth Town” in the Wicklow Settlement Strategy (Table 3.3 of the Core Strategy). Self-Sustaining Growth Towns are described as having a “*moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.*”

Table 3.3 Wicklow Settlement Hierarchy

Level	Settlement Typology	Description	Settlement
1	Metropolitan Area	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Bray
	Key Town		
2	Core Region	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres.	Wicklow - Rathnew
	Key Town		
3	Core Region	Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.	Arklow
	Self-Sustaining Growth Towns		Greystones - Delgany
			Blessington

Figure 5 Wicklow Settlement Hierarchy

Arklow Population Target

The housing and population growth targets for Arklow are significant and reflect its position as a settlement of scale that is third in the County behind Bray and Wicklow-Rathnew (along with Greystones, Delgany and Blessington).

In this regard Arklow and the other Level 3 towns are each to be targeted for growth rates of 25%-30% over the life of the current Development Plan.

Level	Settlement	Justification
1, 2	Bray	Key Towns are identified for growth rates of c. 35% having regard to their identification in the RSES as towns suitable for higher levels of growth.
	Wicklow - Rathnew	
3	Arklow	Towns in Level 3 are targeted for growth rates of 25%-30%, with slight variations based on capacity / past trends. It is estimated that growth in Greystones – Delgany will exceed this target range before the end of the plan period due to legacy housing developments under construction.
	Greystones - Delgany	
	Blessington	

Figure 6 Settlement Growth Rates

However, the population of Arklow in the 2022 Census was recorded at 13,399 which was an increase of only 1.8% from the 2016 Census (13,126), which is well below the State average of 8.1%. By comparison Wicklow/Rathnew grew by 18% and Greystones/Delgany grew by 21% over the same period.

Applying a 25% growth rate for Arklow’s from Census 2022 to Q2 2028 (the expiry of the 2022 CDP) would give a population target of 16,749.

However, the Q2 2028 population target for Arklow in Table 3.4 of Core Strategy is 15,419, which represents only a 15% increase from the 2022 Census figure.

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		

Figure 7 Settlement Population Targets

Arklow Housing Target

Table 3.5 of the Core Strategy estimates a housing target for each settlement over the life of the Plan based on the population targets outline in Table 3.4.

Table 3.5 estimated an Arklow housing stock by Q2 2022 of 5,671 units comprising existing housing stock (5,406 units) and estimated completions (265 units).

In accordance with the 15,419 population target by Q2 2028, Table 3.5 targets a Housing Growth for Arklow of 790 units (to 6,461) between Q3 2022 and Q2 2028.

Wicklow County Development Plan 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

Figure 8 Settlement Housing Targets

However, Section 3.5 of the Core Strategy (under Zoning Principles) also clarifies that for larger towns in the County in Settlement Levels 1-5 (including Arklow) that ***“there shall be no quantitative restriction inferred from the Core Strategy housing targets on the number of units that may be delivered on town centre regeneration / infill / brownfield sites within individual towns.”***

Principle 2 (Delivery of Population and Housing Targets) of Section 3.5 also clarifies that town centre regeneration / infill / brownfield developments are those 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”*.

Housing Delivery in Arklow 2022 to Date

As noted above the allocation to Arklow during the life of the current Development Plan is 790 units and equates to a housing delivery of 132 units per annum.

McGill Planning undertook a review of housing commencements in Arklow since the adoption of the County Development Plan.

The National Building Control and Market Surveillance Office's BCMS (Building Control Management System) records that in the 3 years between Q3 2022 and the present (April 2025) only 53 residential units have been commenced in the town.

Between July 2022 and February 2024 only 19 houses were commenced. Furthermore, the relative increase in commencements (for a total of only 34 units) in March and April last year was clearly as a result of the closing date of April 24, 2024 for availing of temporary local authority development contributions scheme.

Despite that scheme being further extended since to include for developments commenced before the end of 2024, no additional commencements occurred in Arklow.

COMMENCEMENTS Q2 2022 to Present				
Address	Number of Units	Commencement Notice No.	Commencement date	WCC Planning Ref.
Meadowvale	2	SN0000247WW	23-Apr-24	22/366
Emyvale	6	CN0113319WW	03-Apr-24	23/447
Meadowvale	24	CN0112246WW	02-Apr-24	22/366
39A Wexford Road	2	SN0009861WW	11-Mar-24	17/517
Heatherside	3	CN0106036WW	02-Oct-23	21/1218
Heatherside	16	SN0007567WW	08-Aug-22	20/235
	53			

Table 1 Arklow Residential Commencements During Life of County Development Plan To Date

53 units equates to an average delivery of only 18 units per annum / 4.5 units per quarter over the past 3 years. This rate is less than 14% of the 132 units per annum required to reach the 790 unit target by Q2 2028.

Assuming all of these commenced units will be completed during the life of the Plan then as it stands there are an additional 737 units to be provided in the town before the end of Q2 2028.

However, if the current rate of delivery was to continue for the next 3 years then the housing delivery for Arklow would fall short of the Development Plan target by 86% (684 units).

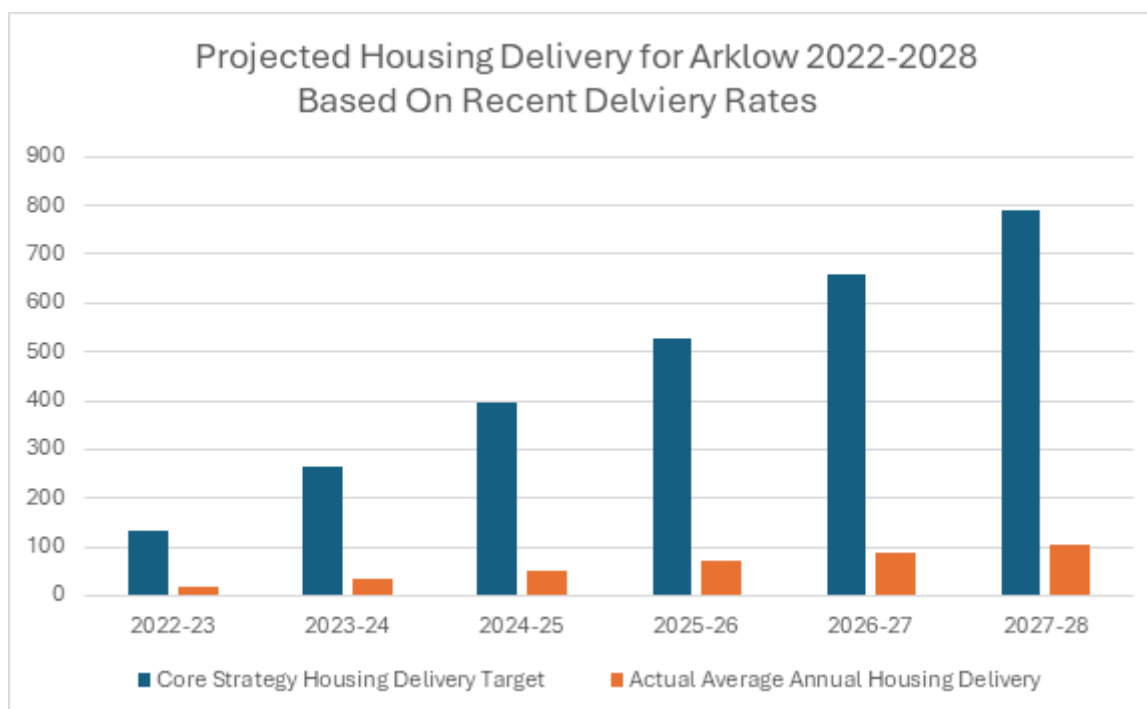


Figure 9 Projected Housing Delivery Rates for Arklow Based on Delivery Rates Q3 2022 to Present.

Non-Activation of New Residential Planning Permissions

There are a number of permissions granted since the adoption of the Development Plan in 2022 for new residential development in Arklow but which have not been activated or commenced.

The table below lists extant planning permissions, totalling 728 units. As can be seen the vast majority of units (65%) are within a single planning permission, comprising an LRD for 476 units at Tinahask.

Address	Res Units	Planning Ref	Grant Date	Permission Expires	Existing Built Up Area?
Yellow Lane	32	20/1210	30/05/2023	29/05/2028	Y
Arklow Shipping Premises	34	23/ 381	04/11/2024	03/11/2029	Y
Upper Main Street	99	24/84	04/12/2024	03/12/2029	Y
Knockenrahan Upper	3	24/285	07/01/2025	06/01/2030	Y
Kilbride	84	23/756	05/02/2025	04/02/2030	N
Tinahask Upper	476	24/325	21/01/2025	20/01/2032	N
Total	728				
Total Excl AAP Lands	168				

Table 2 Extant Permissions Granted in Arklow During Life of County Development Plan

84 of the units are also located in Phase 1 of this Kilbride development as noted above. It is understood that this permission will commence presently.

However, in relation to the other permissions, of which over 170 were granted in 2023/24 there is no indication of when or indeed if any will commence and start delivering units.

A further consideration is that only 3 permissions, totalling 36 units, have permission lives that tally within the life of the Development Plan (Q2 2028). Most of the extant units are subject to permissions that extend up to 4 years beyond the life of the current Development Plan.

The LRD permission at Tinahask is for 7 years until January 2032, by which time the next County Development Plan will be into its 4th year.

It is also likely that a proportion of these permissions may be significantly delayed from commencement/completion to beyond the life of the current Development Plan or indeed may not commence at all and expire.

The % of Commencements per Units Granted during the first 3 years of the Development Plan is extremely low at only 7%.

Even when omitting the two 2025 granted permissions on the AAP lands at Kilbride and Tinahask, the percentage is still very low at 30% (53 commenced units vs 174 permitted units).

That such low commencement rates occurred during a period when the development levies rebate scheme was in play to unlock permissions makes the results for Arklow even more surprising.

By contrast, the percentage of completions per units granted for the State for each of the years 2022-2024 was extremely high at 87% and over.

Year	Units Granted	Dwelling Completions per Year	% Completions per Units Granted
2022	34,177	29,726	86.98%
2023	41,225	32,695	79.31%
2024	32,401	30,330	93.61%

Table 3 Ratio of Residential Units Grant to Units Completed Nationally 2022-2024

Naturally the restrictions on the development of Arklow town pending the delivery of the new Wastewater Treatment Plant was a significant inhibitor in planning and delivery during the initial years of the County Development Plan.

However, despite the new WWTP been fully operational since Q4 2024 none of the permissions listed above have commenced, nor has there been, LRD aside, any significant increase in permissions for large residential developments.

Estimating Housing Delivery for the Remainder of the Development Plan

As noted in the Core Strategy in relation to the residential development potential of brownfield and infill sites, it is equally difficult to predict how many additional residential units will be delivered in Arklow during the remaining life of the Development Plan.

However, given the extremely low annual rate of delivery to date, it would appear unlikely that all 728 extant permitted units will be commenced and delivered during the remaining 3 years of the Development Plan up to Q2 2028.

At the same time, it would be misleading to assume that the extremely low rates of commencement and delivery since the adoption of the County Development Plan are likely to continue into the future, particularly with the WWTP now fully operational and given that further government incentives to unlock housing delivery are expected in the coming year.

This study therefore assumes that housing delivery rates will increase in Arklow and that a significant proportion of the permitted units can be constructed and completed over the next 3 years and will partly achieve the Core Strategy Housing Target for Arklow.

This scenario is based on the following assumptions:

1. That all extant permission will be commenced in Q3 2025.
2. That a steady rate of units will be delivered per quarter analogous with the individual permission lives (a number of which extend beyond the life of the current Development Plan).

We estimate that just short of 400 units could be delivered from the extant permissions in that scenario which delivers on average 33 units per quarter from the extant permissions. 33 units per quarter would still be a seven fold increase on rates from the first 3 years of the Development Plan, and is arguably very optimistic.

Furthermore, 124 of those units (31%) would be delivered on sites that are classified as town centre / brownfield / infill within the town and therefore not subject to the housing target restrictions as per Section 3.5 of the Core Strategy.

Nevertheless, despite such an unprecedented increase in housing output, this would still result in the Development Plan Housing Target for Arklow falling short by 339 units (737 – 398), which is 43% of the target remaining.

This shortfall increases to 463 units (59%) when the town centre / brownfield / infill permissions (124 units) are excluded.

Revised Housing Delivery Including Kilbride LRD

The current LRD proposal at Kilbride is for 666 residential units as part of a 7-year planning permission. Assuming that permission is granted by the end of 2025, then the permission life would be to Q4 2032.

Assuming commencement in Q1 2026 and a rate of housing delivery per quarter of 24 units averaged over the life of the permission then the development would deliver 238 units before the expiry of the Development Plan in Q2 2028.

Therefore, even on the basis of both LRDs (Kilbride and Tinahask) commencing and delivering units along with all other extant permissions, the housing target for the town for the remaining life of the current Development Plan would still not be met and would fall short by approximately 100 units, or 225 units if town centre / brownfield / infill units are excluded. This is demonstrated in Figure 6 below.

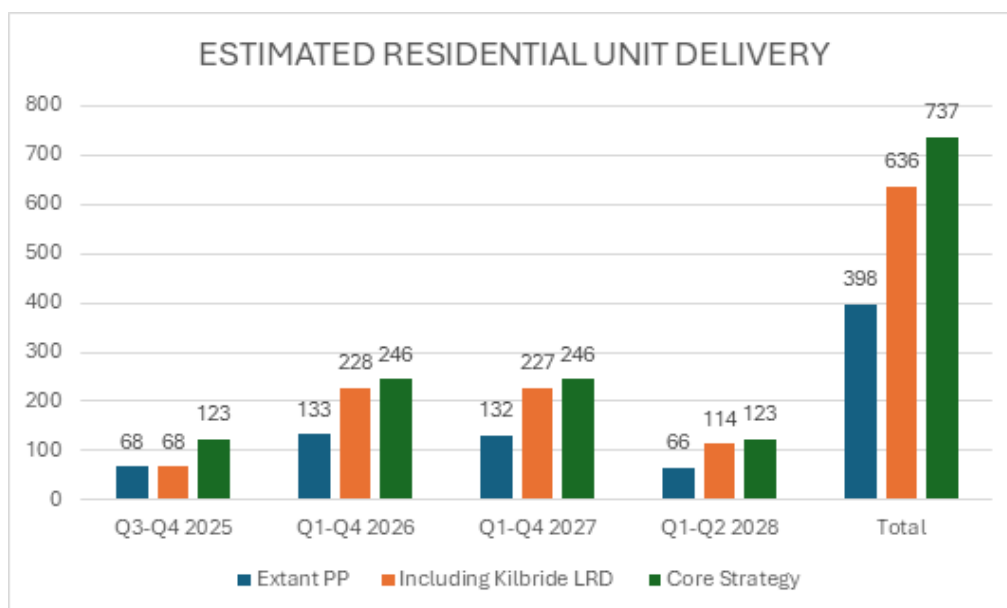


Figure 10 Estimated Residential Unit Delivery To Achieve Arklow Core Strategy Housing Target

Conclusions

The above assessment demonstrates that there is ample justification to permit the Kilbride LRD proposal for 666 units - an unparalleled new residential community in Arklow that will also deliver significant physical and social infrastructure for the town including a new boardwalk across the Arklow Marsh and Avoca River, and a new local centre, along with pedestrian and cycle connections to the permitted school campus.

The rate of housing delivery over the life of the Development Plan has been extremely low, and despite additional residential permissions been granted, particularly with the LRD proposal on the opposite side of the town at Tinahask; to date, none of these permissions have yet commenced.

It is unclear why none of these permissions have commenced, particularly given that the new WWTP has been in operation since last year and during when the development levies rebate scheme was available to developers.

As it stands and based on recent trends it would appear likely that the housing target for Arklow in the Core Strategy will therefore not be achieved and will fall far short of same.

It is therefore critical that accommodation is made for additional viable planning permissions that can help deliver the Core Strategy Housing Target for the town.

The above report demonstrates that the Kilbride LRD will not undermine or contravene the Core Strategy for Arklow, but in fact will significantly help achieve the housing target of 790 additional residential units by Q2 2028 when the current Development Plan expires.

LAP PHASING JUSTIFICATION

The LRD Opinion, issued on the 21st January 2025 by Wicklow County Council also requested, under Item B, the following:

“Phasing.

Justification of the development having regard to the location of AAP3: Kilbride lands within Priority Area 3, in advance of Priority Area 1 and Priority Area 2 as set out in the Appendix D: Phasing and Implementation of the Arklow and Environs LAP 2018. The development of these lands could it is considered represent a material contravention of the Arklow and Environs LAP, and the provisions of the County Development Plan 2022-2028 in respect of lands in a sustainable manner."

The following outlines how the current LRD planning application for 666 residential units on the subject lands at Kilbride, if permitted, will not undermine or materially contravene the Arklow and Environs LAP and the provisions of the Wicklow County Development Plan with regards to Arklow.

Revised Proposal

As set out above the current proposal as submitted for planning is for 666 units, a reduction from LRD Stage 2 (Opinion) when a draft scheme of 750 units was proposed. The reason for the reduction is that in the interim, on 5th February 2025, Phase 1 of the Kilbride development comprising 86 houses has separately received planning permission from An Bord Pleanála (following 3rd party appeal of the original Wicklow CoCo grant)— Ref. ABP-319604-24 (WCC Ref. 23/756) refers. The ABP Grant of Permission was informed by the ABP Inspector's Report (dated 23rd December 2024).

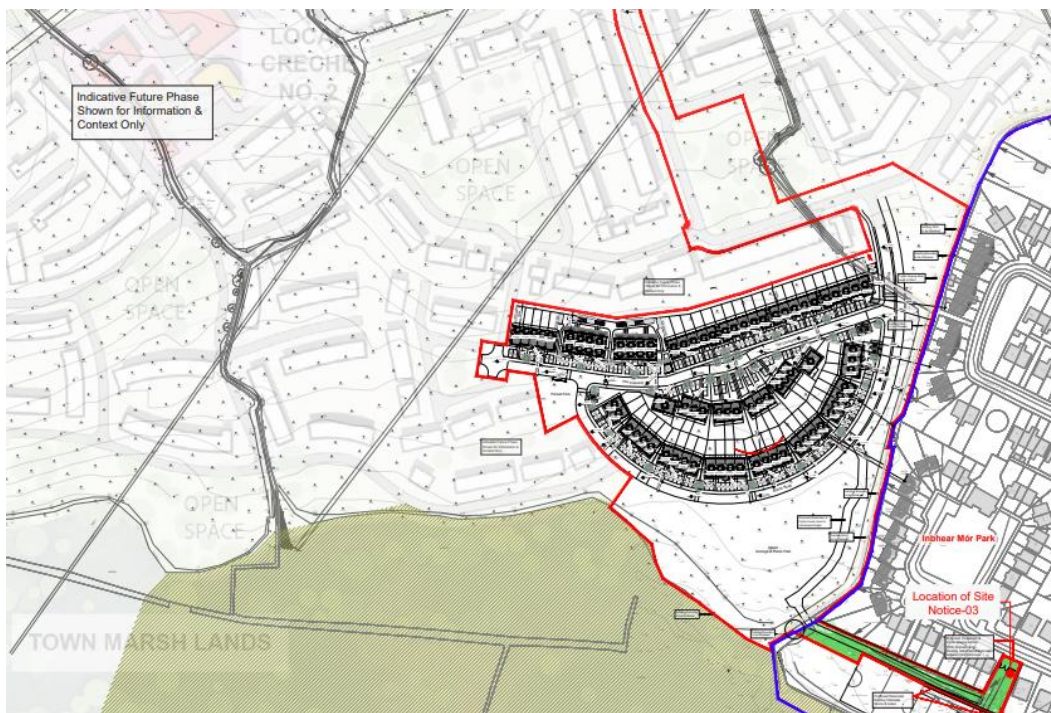


Figure 11 Permitted Site Layout for Kilbride Phase 1 WCC Ref. 23/756

Previous WCC & ABP Assessment of AAP3 Phasing Justification

It is noted that Phase 1a of Character Area 1 was approved by Wicklow CoCo (Notification of Decision to Grant 5th April 2024) and An Bord Pleanála (5th February 2025), and included a detailed Phasing Justification Report.

In the WCC Planner's Report (dated 28th November 2023) the following was noted in relation to the Priority Area 3 Phasing Justification submitted at that time:

“...the applicant has submitted that there are exceptional circumstances in accordance with Section 6.3.4 of the Wicklow County Development Plan noting that while the construction of the Arklow WWTP will result in the removal of a significant barrier to new development in Arklow, there are still significant infrastructure to the development of the AAP1 and AAP2 lands which need to be addressed, while the AAP3 lands are ready to go.

The applicant has also submitted a Community and Social Infrastructure Audit in support of their planning application, the contents of which are noted.”

“I note that the Action Area Plan for the AAP2 lands in South Arklow was agreed with Wicklow County Council in June of 2023 and that the upgrading of existing roads infrastructure and the provision of a new port access road are required as part of the development of these lands. I also note the distance between the AAP3 lands and the AAP2 lands on opposite sides of Arklow Town and that spatially the AAP3 lands are closer to Arklow Town Centre. There is also a large employment function associated with the AAP2 lands as well as a residential function.

The granting of planning permission for a new school campus on the AAP3 lands is also noted and the proposed pedestrian and cycle connection proposed as part of this current planning application will serve to link the school circa soft modes of travel to the future and existing residential development in north Arklow.

In this regard the AAP3 lands appear ready to go in terms of allowing their commencement of development and will facilitate the provision of social infrastructure in the form of a section of parking, play areas, pedestrian and cycle routes and the linking of the new school campus to the wider developed area via a soft mode of travel.

It is considered that the principle of allowing the AAP3 lands to proceed at this point is acceptable and that the location of the first residential development on these lands is acceptable and consistent with the requirements of the County Development Plan and the Arklow Town and Environs LAP.”

In assessing the Priority Area 3 Phasing Justification the ABP Inspector’s Report (paragraphs 7.5.2 to 7.5.9) states the following:

“In terms of the wider LAP area, I note the provisions of the LAP in relation to AAP1 and AAP2 and that Appendix D of the LAP sets out Phasing and Implementation. I acknowledge, as stated by the appellant that Action Area 3 is within Priority Level 3 after the town centre, waterfront and AAP1 and AAP2. However, I note that the LAP on Page 56 states that the principles of phasing may be contravened in exceptional circumstances e.g. if there is a barrier to development.”

“The applicants submitted a Phasing Justification with the application. It sets out that

- Population and growth targets for the town are not being achieved.*
- AAP1 and AAP2 lands are not coming forward for development, and no planning permission has been sought on these lands. (Recent permission granted at Tinahisk is however noted WCC ref. 24/325).*
- No Action Area Plan has been prepared for AAP1/AAP2 lands. (I note this has been achieved for AAP3 lands. I also note that an approved AAP for AAP2 is available dated June 2023 on the WCC website).*
- The development of AAP1 and AAP2 lands are severely restricted by road infrastructure deficits (I note constraints are also detailed in the LAP).*

- *No infrastructure in place in the AAP1/AAP2 lands while a school campus has been progressed in AAP3 lands*
- *Town centre and waterfront higher priority lands are within Flood Zones A and B.”*

“I consider that the above establishes a reasonable justification for the proposed development of AAP3 lands in advance of other lands within the LAP area. I note that the Planning Authority was also satisfied in this respect.”

“I therefore consider the proposal represents a phased, coherent approach, and that while it allows for development in stages, the approach is not piecemeal. This complies with the requirements of Section 6.3.4 and Objective CPO 6.19 of the WCDP and would comply with objective H4 of the LAP, and the vision for AAP3. I consider that the response of the applicant has adequately addressed the matters raised in the appeal and I note that the Planning Authority was also satisfied with the proposed approach. “

Wicklow County Development Plan 2022-2028

Core Strategy

As highlighted above, Arklow is designated as a “Self-Sustaining Growth Town” within the Core Area of the Eastern & Midlands and is targeted for growth rates of between 25%-30%

“Self-Sustaining Growth Towns” are defined as comprising “a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.”

The Core Strategy records the population of Arklow (2016 Census) at 13,226 and sets a population target of 15,419 to the end of 2028. This would require an additional 790 residential units to be provided from Q3 2022 to Q3 2028.

Phasing

Section 6.3.4 and Policy CPO 6.19 of the Development Plan outlines a general phasing strategy for residential development in the designated growth towns, which states:

“The development of zoned / designated land should generally be phased in accordance with the sequential approach:

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

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.”

Social Infrastructure & Accessibility

Policy CPO 6.20 of the Development Plan also states that:

“Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.

New significant residential or mixed use development proposals (of which residential development forms a component), shall be required to be accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.

New significant residential or mixed use development proposals shall be required to be accompanied by a ‘Accessibility Report’ that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:

(a) local services including shops, schools, health care and recreational facilities, and

(b) public transport services.

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.”

Arklow & Environs Local Area Plan, 2018-2024

Development Strategy

The LAP outlines a Residential Development Strategy for the Town which seeks to:

- *To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to Arklow.*
- *To ensure sufficient zoned lands are available at appropriate locations capable of meeting the housing needs of the projected population of the settlement area over the plan period in a sustainable manner. Notwithstanding the zoning of land for residential purposes, the Planning Authority shall monitor and implement the population targets as set out in the County Development Plan and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded.*
- *To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.*
- *To promote and facilitate the redevelopment of sites in the town centre zoning, including the identified opportunity sites, where development will positively contribute to the commercial and residential vitality of the town centre.*
- *To promote and facilitate the in-depth development of the waterfront zone, for mixed-use development with a high concentration of residential use subject to a high standard of design, layout and finish.*

Residential Development Objective H4 of the LAP states that: *“the development of zoned land should generally be phased in accordance with the sequential approach as set out in the County Development Plan. The Council reserves the right to refuse permission for any development that is not consistent with these principles.”*

Objective H5 states that: *“Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.”*

Based on the Core Strategy of the previous Wicklow County Development Plan (2016-2022) the 2018 LAP zoned sufficient land to provision of up to c.5,638 additional units as per Table 3.1 below:

LOCATION/DESCRIPTION	AREA (HA)	ZONING	POTENTIAL NO. OF UNITS
Action Area Plan 1 Tinahask Upper-Abbeylands	22.7	MU (R28)	600
Action Area Plan 2 Tinahask Upper- Money Little and Money Big	26.6	MU (R28+LSS)	750
	6.75	MU (R20)	135
Action Area Plan 3 Kilbride	50	MU (R28 + LSS)	1,500
Action Area Plan 4 Coolboy	22	MU (R Special)	220
Coolboy (east of M11)	3.46	R10	34
Money Little (west of Wexford Road)	2.5	R20	50
Yellow Lane	0.7	R28	19
New Residential infill sites		R28	900
The Alps Opportunity Site		TC	160
Main Street Opportunity Site		TC	70
Waterfront Zone North		WZ	300
Waterfront Zone South		WZ	500
Town centre infill		TC	150
Existing residential infill		RE	250
TOTAL Potential new housing			5,638⁹

Table 3.1 Residential zoning provisions

Figure 12 Extract of Arklow LAP Housing Calculation

Residential Phasing

Appendix D of the LAP sets out a Phasing and Implementation Strategy for Residential zoned land in Arklow. The Strategy is based on the following spatial development principles:

- *Application of the ‘sequential approach’ whereby zoning extends outwards from the town centre, contiguous to the existing built up part of the settlement;*
- *promotion of the concept of ‘walkable’ neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized;*
- *promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In*

this regard, undeveloped land within 1 km of the train station or 500m of bus routes will be prioritized;

- lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized;*
- cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;*
- promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones.*

The development of zoned / designated land should generally be phased in accordance with the sequential approach:

- Development shall extend outwards from the town centre with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;*
- a strong emphasis shall be placed on encouraging infill opportunities and better use of underutilised lands; and*
- areas to be developed shall be contiguous to existing developed areas.*

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.

Based on the above principles the LAP designates 3 priority areas for residential development:

- Priority 1 - town centre, infill and waterfront**

Based on LAP Table 3.1 these zoned sites would account for c.40% (c.2,350 units) of the total potential new housing in the LAP.

- Priority 2 – Action Area Plan 1&2, and greenfield housing lands to the west of the town at Lamberton, Ballyraine, Knockenrahan**

Based on Table 3.1 these zoned lands would account for c.30% of the total potential new housing.

- Priority 3 – Action Area Plan 3 (Kilbride), Action Area Plan 4, and other greenfield lands north of the river.**

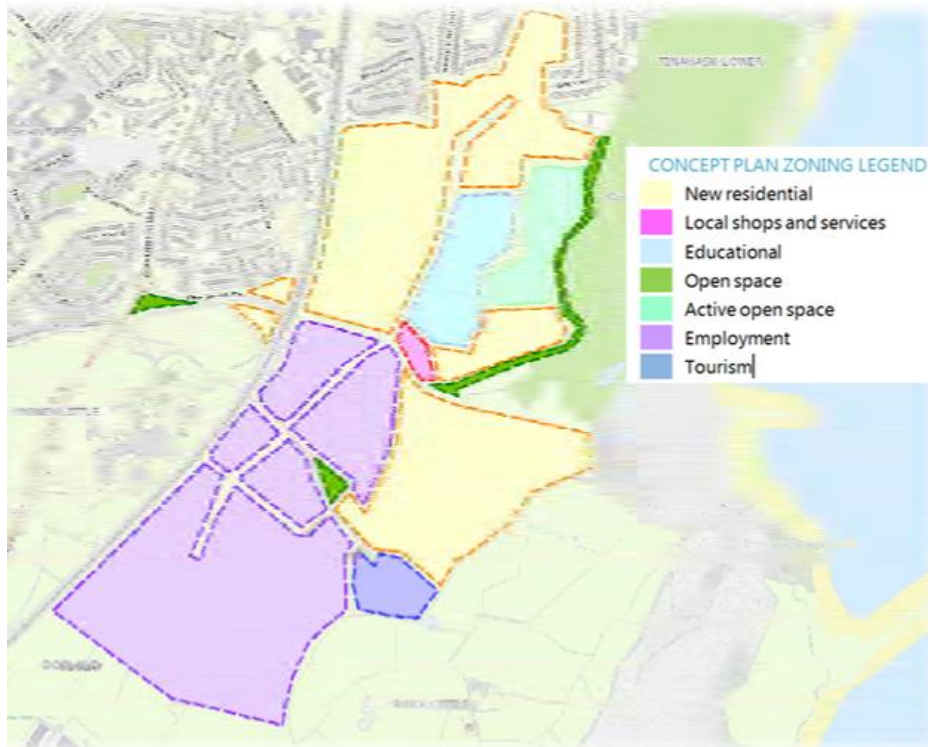
Based on Table 3.1 the AAP Kilbride lands would account for c.25% of the total potential new housing.

The AAP4 and other outer greenfield zoned lands would account for c.5%.

Objective H8 states that the 4 AAP lands shall be “developed as comprehensive (not piecemeal) integrated schemes that allow for the sustainable phased and managed development of each action plan during the plan period.”

Once an overall Action Area Plan (AAP) has been agreed in writing with the planning authority then separate applications for sections of each AAP can be progressed.

The Action Area Plan 1 and 2 lands, which are given the highest priority for development of the greenfield lands in the LAP, are located south-east of the town at Abbeylands and Tinahesk and extend to c.94ha. Please refer to Map 11.2 below taken from the LAP.



Map 11.2 Concept plan of AAP1, AAP2 and zoned lands to the at Money Big/Bogland

Figure 13 Extract of AAP1/AAP2 Map

The following criteria set out in the LAP are noted in relation to AAP1 and AAP2.

- There is currently no access point available from the existing built up area to the APP1 lands.
- Whilst the LAP states that the Local Authority will endeavour to determine or provide such a route, principal vehicular access to AAP1 is dependent on a new road via AAP2.
- However AAP2 lands also require significant improvement of the existing link road and railway bridge from the Knockmore roundabout.
- Objective IT7 also requires the provision of a new distributor road through AAP1 lands and the employment lands to the south as part of the development of the AAP1 lands.
- The development of AAP1 and AAP2 is also expected to deliver the ‘port access road’ which is deemed an essential piece of road infrastructure for the wider town to remove port bound traffic from the main street and town centre.

- The AAP1 and AAP2 lands are designated to provide large Active Open Spaces totalling 6.2ha.
- The AAP1 and AAP2 lands are designated to deliver 3 additional schools (2 primary and 1 post primary).
- A minimum of 18ha is to provide for employment uses.
- The LAP requires the phasing of development in AAP1 such that the first phase shall include all of the road infrastructure and Active Open space and no more than 50% of the residential development.
- The phasing of AAP2 shall be phased such that the road infrastructure (providing access to the AAP1 lands to the north) and local shops & services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space, employment facilities and Southern Port Access link road shall be provided no later than Phase 2 accompanied by no more than 75% of the residential units (an additional 25% on top of Phase 1).

Spatial development strategy & justification for AAP3 Kilbride lands

The AAP3 lands at Kilbride are subject to an overall Masterplan for the lands prepared in by a team of architects led by BKD Architects.



Figure 14 Kilbride Lands Masterplan

The original Masterplan was prepared in 2019 and in tandem with same, an Action Area Plan for the overall landholding was formally agreed with Wicklow County Council, as is required under the Arklow LAP.

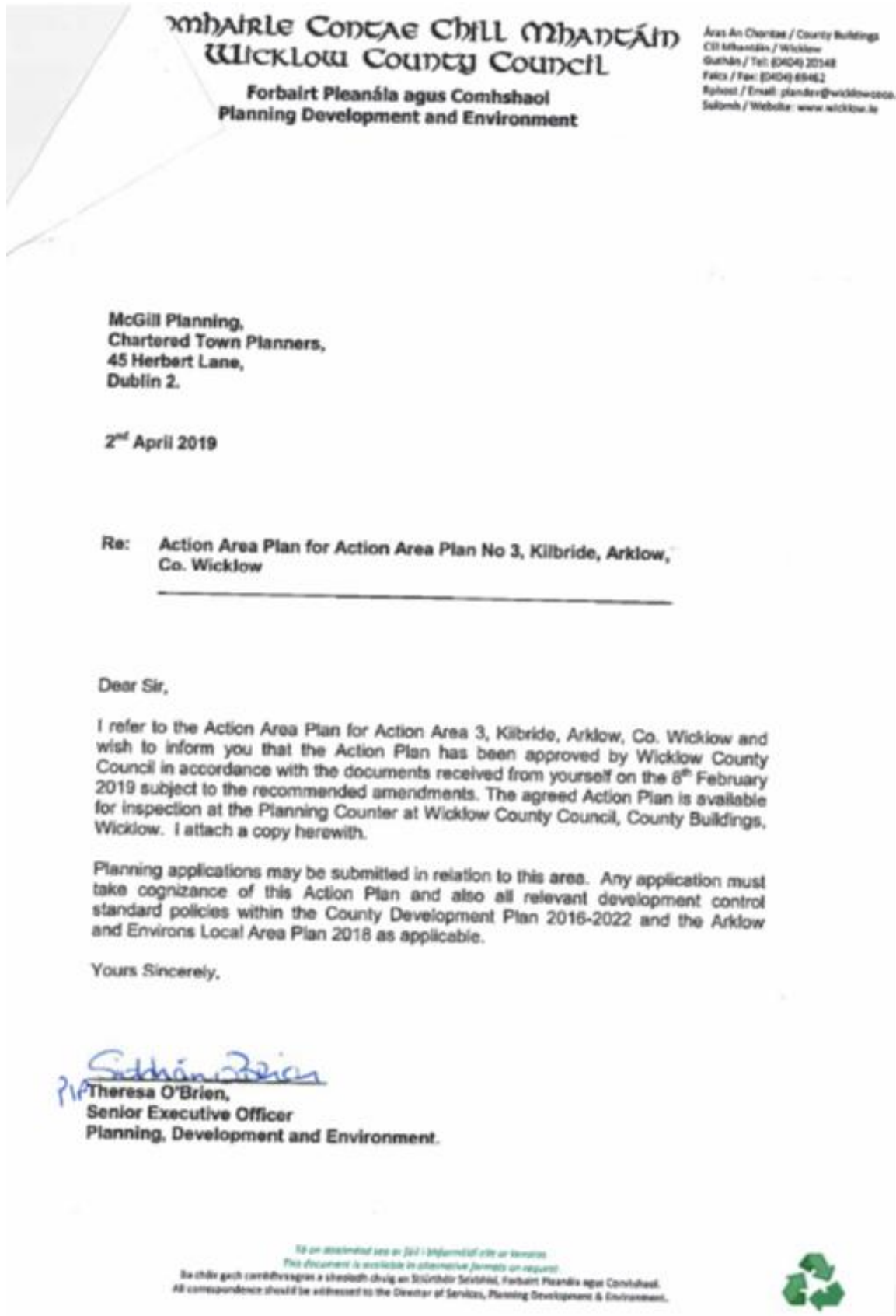


Figure 15 Confirmation of agreed Area Action Plan for Kilbride Lands

The Masterplan was updated as part of the Kilbride AAP Phase 1 development of 84 houses granted by An Bord Pleanála - Ref. ABP-319604-24 (WCC Ref. 23/756).

Since the Action Area Plan was agreed with Wicklow County Council there have been a number of significant infrastructural developments to benefit AAP3.

The Arklow Wastewater Treatment Plant upgrade has been permitted, constructed and is now fully operational and serving the town.

A new school campus has also been granted permission within the Kilbride Masterplan lands by the Department of Education (Ref. 22/213) and which will comprise a 2-storey, 16 classroom primary school and a 3-storey post primary school for 400 students.

As a result, the first phase residential development for 84 houses has been granted on the Kilbride lands, and is understood will commence shortly.

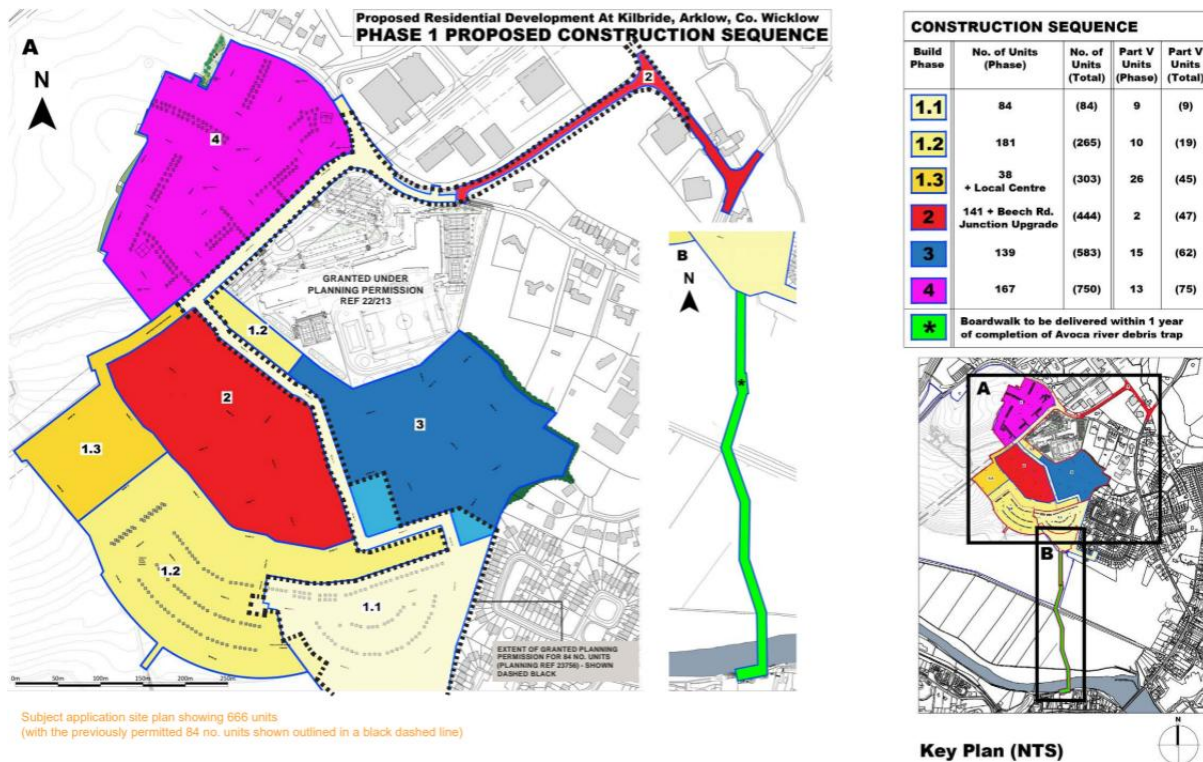


Figure 16 Kilbride LRD Phasing

With the new WWTP upgrade operational and a new school campus to be developed also within AAP3, it is contended that the current LRD proposal for further phasing of the Kilbride lands for an additional 666 units (along with delivery of the local centre, pedestrian/cyclist boardwalk over the Arklow Marsh and Avoca River, provision of new public open spaces, further extension of the distributor road, upgrades to the existing public roads) can be justified having regard to the Spatial Development Strategy criteria of the LAP as follows:

Principle	Statement of consistency
<i>Application of the 'sequential approach' whereby zoning extends outwards from the town centre, contiguous to the existing built up part of the settlement;</i>	<p>The Kilbride AAP area immediately abuts the existing built up area of Arklow with Willow Grove, Avondale Crescent and Murell Drive to the east.</p> <p>Phase 1.1 of the Kilbride development as permitted includes a new public pedestrian and cyclist route through the adjoining WCC lands to the east and connecting with the public network in the Avondale estate and to the Dublin Road.</p> <p>The current LRD proposal (for Phases 1.2 to 4) now also includes for a pedestrian/cyclist boardwalk and bridge over the Arklow Marsh and the Avoca River which will connect directly into Arklow Town Centre.</p> <p>This will be a significant piece of transport infrastructure not just for the development and Kilbride but indeed the whole of Arklow which will provide a dedicated sustainable transport route between the north and south of the town, connecting residential communities to services, social infrastructure and amenities.</p> <p>The Kilbride AAP is immediately adjacent to and contiguous with the existing built up area of Arklow and with the provision of the new boardwalk/bridge will also be directly connected to Arklow Town Centre. The proposed development will therefore enable the extension out from the town centre in line with this principle.</p>
<i>Promotion of the concept of 'walkable' neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized;</i>	<p>This area provides a 'walkable' neighbourhood, which, with the provision of the new boardwalk and bridge will be within 10 mins walk of Arklow Town Centre.</p> <p>Furthermore the development will include a significant new local centre with services and amenities that will be within 5 minutes walk of the new residential communities proposed.</p> <p>The development will also provide a new shorter, safer route for pedestrians and cyclists to the new permitted primary and post primary</p>

	<p>schools within Kilbride AAP permitted under WCC reg ref 22/213.</p> <p>The lands are also within 15 minutes' walk of the existing Bridgewater Centre, is immediately adjacent to the Marshlands Sports Centre and is within 10 minutes' walk of the existing primary school, the new primary and post primary schools and existing local centre on the Dublin Road.</p>
<p><i>Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of the train station or 500m of bus routes will be prioritized;</i></p>	<p>This site promotes a sustainable land use and transportation pattern as it is within short walking distance of the Bus Eireann routes which operate along the R772 Dublin Road.</p> <p>With the provision of the boardwalk and walk/cycle bridge Arklow Train Station will be within 30mins walk or 10 mins cycle of the development.</p> <p>The LRD proposal also include for set down at the new local centre which can facilitate any future public bus service to serve the new community.</p>
<p><i>lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized;</i></p>	<p>It will be necessary for the applicant to sign a Major Connection Agreement with Irish Water to connect to the public foul sewer network and to supply potable water to the development site.</p> <p><u>Waste Water</u></p> <p>The new development will connect up to the new WWTP and without the need for temporary wastewater treatment on site.</p> <p>The preferred route has now been established and these works will include an upgrade of the existing public sewer on the Dublin Road and the Ferrybank Road. Significant upfront investment will be required from the applicant to cover the considerable cost of these works.</p> <p>The upgrade of these public networks will increase their available capacities providing significant benefits to the public for future connections in the area.</p>

	<p><u>Water Supply</u></p> <p>Upgrade works will be required to the existing watermain network along the Dublin Road to provide potable water supply to the development. As above the considerable cost of these works will be borne by the applicant as a significant upfront investment.</p> <p>These works will increase the available capacity of the public watermain network providing significant benefits to the public for future connections in the area.</p>
<p><i>cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;</i></p>	<p>This application site is located at a remove from cultural heritage or protected structures in the wider vicinity and as such it will not impact on any buildings or structures of merit.</p> <p>To the northwest of the site, is the Howard Mausoleum Pyramid, and the associated Graveyard which is now under the management of WCC.</p> <p>This pyramid has been maintained over the years. The proposed application will not impact on the setting of this national monument as concluded in the EIAR.</p> <p>In terms of natural heritage, it is noted that the lands are adjacent to the Arklow Marsh a pNHA.</p> <p>Altamar Ecologists have carried out surveys on the flora and fauna associated with this site and also provided advice on the best development approach to the site to ensure the protection of same.</p> <p>Please see the Appropriate Assessment and EclA submitted with this application which includes mitigation measures to protect the environment of this site.</p>
<p><i>promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones</i></p>	<p>The application site is located close to a planned new primary and post primary school campus recently granted on the Masterplan lands to the north and which would be directly accessible for future residents.</p>

	<p>The current LRD application along with the permitted Phase 1.1 development includes a number public open spaces, distributed across the character areas and which will be directly accessible to new residents.</p> <p>This new, south facing park will overlook and provide unobstructed views of Arklow Marsh and Arklow town centre and local landmarks including Saint Saviour's Church and St. Mary's & Peter's Church.</p> <p>The new local centre will include a new plaza/village green, and will include a large creche, health and community services and local retail units.</p>
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Justification / Local Circumstances

The Spatial Development and Phasing Strategy of the Arklow & Environs LAP promotes the development of Priority 1 (town centre/waterfront/infill) and Priority 2 (Action Area Plan 1&2, and residential lands west of the town centre (south), ahead of Priority 3 lands which include our client's lands at Kilbride (AAP3).

This phasing strategy is based on the following rationale:

- Development outwards from the town centre to avoid 'leapfrogging' to "*peripheral areas*".
- Encouraging infill opportunities and better use of underutilised lands.
- Developing lands contiguous to existing developed areas
- As elaborated above, the proposed first phase development of the Kilbride lands can comply with these principles as applicable to greenfield lands, specifically that the lands proposed as the first phase to be developed are contiguous to the existing residential estates and will provide direct access to these areas and local services and public transport.
- The CSO map extract below indicates the AAP3 lands in relation to the CSO town boundary defined by the 2022 Census. This map illustrates AAP1 and AAP2 lands also. AAP1 lands are within the 2022 CSO defined Arklow Town Settlement boundary however a large portion of AAP2 2 lands are outside the CSO town boundary line.



Figure 17 CSO Map (Census 2022) extract showing locations of Area Action Plans

Whilst the LAP Development Strategy emphasise the development of Priority 1 and 2 lands ahead of Priority 3 and 4 areas, it also recognises that there may be exceptional circumstances where the development of lands outside of either Priority 1 or 2, (i.e. that do not meet all of the above principles) can be considered, for example where there is a barrier to development. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.

In this instance, with the 2018 LAP due to be replaced with a new 6 year LAP, and where no development has occurred in Priority 2 and relatively little in Priority 1, it is contended that *“exceptional circumstances”* now arise to justify the consideration of a first phase development of the Kilbride Lands (Priority 3). This justification is elaborated as follows:

1. ***Population and Housing Growth Targets are not being achieved because the AAP1 and AAP2 lands and significant development lands in the town centre/waterfront/existing residential areas have not been brought forward for development during the life of the LAP and County Development Plan***

The Core Strategy of the Wicklow County Development Plan 2022-2028 records the population of Arklow Town (2016 Census) at 13,226; with only a minor increase for the 2022 Census to 13,399 or 173 additional people in this period.

This is significantly below the 8.1% national average growth for Ireland as a whole.

McGill Planning undertook a review of housing commencements in Arklow since the adoption of the County Development Plan.

The National Building Control and Market Surveillance Office's BCMS (Building Control Management System) records that in the 3 years between Q3 2022 and the present (April 2025) only 53 residential units have been commenced in the town.

Between July 2022 and February 2024 only 19 houses were commenced. Furthermore, the relative increase in commencements (for a total of only 34 units) in March and April last year was clearly as a result of the closing date of April 24, 2024 for availing of temporary local authority development contributions scheme.

Despite that scheme being further extended since to include for developments commenced before the end of 2024, no additional commencements occurred in Arklow.

53 units equates to an average delivery of only 18 units per annum / 4.5 units per quarter over the past 3 years. This rate is less than 14% of 132 units per annum required to reach the 790 unit target by Q2 2028.

Assuming all of these commenced units will be completed during the life of the Plan then as it stands there are an additional 737 units to be provided in the town before the end of Q2 2028.

However, if the current rate of delivery was to continue for the next 3 years then the housing delivery for Arklow would fall short of the Development Plan target by 86% (684 units).

There are a number of permissions granted since the adoption of the Development Plan in 2022 for new residential development in Arklow but which have not been activated or commenced.

McGill Planning have recorded a number of permissions totalling 728 units. The vast majority of units (65%) are within a single planning permission, comprising an LRD for 476 units at Tinahask. 84 of the units are also located in Phase 1 of this Kilbride development as noted above. It is understood that this permission will be commenced presently.

However, in relation to the other permissions, of which over 170 were granted in 2023/24 there is no indication of when or indeed if any will commence and start delivering units.

A further consideration is that only 3 permissions, totalling 36 units, have permission lives that tally within the life of the Development Plan (Q2 2028). Most of the extant units are subject to permissions that extend up to 4 years beyond the life of the current Development Plan.

The LRD permission at Tinahask is for 7 years until January 2032, by which time the next County Development Plan will be into its 4th year.

It is also likely that a proportion of these permissions may be significantly delayed from commencement/completion to beyond the life of the current Development Plan or indeed may not commence at all and expire.

The % of Commencements per Units Granted during the first 3 years of the Development Plan is extremely low at only 7%. By contrast, the percentage of completions per units granted for the State for each of the years 2022-2024 was extremely high at 87% and over.

Naturally the restrictions on the development of Arklow town pending the delivery of the new Wastewater Treatment Plant was a significant inhibitor in planning and delivery during the initial years of the County Development Plan.

However, despite the new WWTP been fully operational since Q4 2024 yet none of the permissions listed above have commenced, nor has there been, LRD aside, any significant increase in permissions for large residential developments.

As it stands and based on recent trends it would appear likely that the housing target for Arklow in the Core Strategy will therefore not be achieved and will fall far short of same.

It is therefore critical that accommodation is made for additional viable planning permissions that can help deliver the Core Strategy Housing Target for the town.

The Kilbride LRD will not undermine or contravene the Core Strategy for Arklow, but in fact will significantly help achieve the housing target of 790 additional residential units by Q2 2028 when the current Development Plan expires.

2. The development of AAP1 and AAP2 lands are severely restricted by road infrastructure deficits.

Despite the clear priority given to the AAP1 and AAP2 lands in the LAP their delivery for housing appears to be constrained, at least in part, by infrastructure constraints as well as the fact that the lands are in mixed ownerships, which can be a further constraint to comprehensive redevelopment.

The LAP acknowledges that there is currently no access point available from the existing built-up area to the AAP1 lands.

While the LAP states that the Local Authority will endeavour to determine or provide a new route to the AAP1 lands no such road has been progressed during the life of the LAP.

The alternative access via the AAP2 lands to the south is in turn hampered by the fact that those lands are also constrained by a below standard railway bridge access to the Knockmore roundabout.

To this end the AAP2 LRD permission granted by WCC in January included conditions limiting the occupation of dwellings (to 400 units) until the existing railway bridge has been upgraded. That condition therefore also limits the development of AAP1 lands until the railway bridge has been upgraded.

Iarnorid Eireann, in its submission on the LRD, also noted that the use of the overbridge as part of the development along with planned works had yet to be agreed with them.

In addition, the LAP also requires that the development of these lands will also require a new distributor road through the lands to the employment lands to the south, and also to provide a new 'port access road' which is deemed an essential piece of road infrastructure for the wider town to remove port bound traffic from the main street and town centre.

It is noted that that no public funding (e.g. LIHAF) has been secured for the provision of new public roads into/through these lands.

As such it appears, notwithstanding the granting of permission for the WWTP upgrade and construction, that the total development of the AAP1 and AAP2 lands are constrained by the significant infrastructure improvements that are required to open up these lands and make them accessible.

The following factors which must be considered are:

- a. *The LAP objective to provide for a Port Access Road*
- b. *The LAP objective to provide and Northern arterial road or link route to the Adjacent AAP1 lands.*
- c. *The LAP objective to provide a southern arterial link route to the 'Data centre lands.'*
- d. *The preservation of existing mature overgrowth and trees to the 'Valley' area*
- e. *The severe undulating topography of a large portion of the subject lands to the central Valley area.*
- f. *The LAP zoning objectives for the AAP2, requiring a mix of specific uses such as Mixed Use Residential, Local shops and services, community & education, employment and open space.*

Similar constraints do not occur for the Kilbride lands where direct access to the existing public road is available via the proposed new link which will also serve the planned school campus and which is already permitted in part as part of the Phase 1.1 permission for 84 units. In addition, new pedestrian/cyclist connections are being proposed to provide additional sustainable connections with adjoining residential estates, whilst the current LRD will provide for a new pedestrian/cyclist boardwalk/bridge directly to Arklow town centre.

3. No school infrastructure in AAP1/AAP2 whilst a new school is planned at Kilbride APP3

The AAP1 and AAP2 lands have no existing or planned school infrastructure on the lands. The LRD permission had to include conditions requiring some of the public open space proposed to be set aside for a potential future school development and limiting occupation of the dwellings (to 50%) until the lands have been transferred to the relevant authorities. In contrast, the AAP3 lands in Kilbride already has an extant school permission in place ready to be delivered with the planned residential development.

This school permission within the Kilbride AAP lands has planning permission for a significant new education campus that will comprise a 2-storey, 16 classroom primary school and a 3-storey post primary school for 400 students. This new school development will provide the educational requirements for the future Kilbride community and within short walking distance. The new schools on the Kilbride lands have easily been facilitated by the applicant as the entire Kilbride lands are in single ownership.

4. Priority 1 Lands at Floodrisk

It is noted that the large swathes of the existing town centre and the Waterfront lands have significant issues with regard to flooding as set out in Appendix C of the LAP, the Strategic Flood Risk Assessment.

This SFRA identifies that much of the Town Centre and all of the Waterfront area are located in flood zones A and B. Vulnerable land uses such as housing are not generally recommended for development in such locations and the redevelopment of these lands must undergo a Justification Test as per the *Planning System & Flood Risk Management Guidelines* (2009).

This may account for why significant new residential permissions have not been sought in the town centre and waterfront lands during the life of the Development Plan despite the positive phasing designation.



Figure 18 Extract from LAP showing extent of flooding

Conclusion

The 2018-2024 Arklow LAP outlines a Phasing Strategy for the development of residential zoned lands based on the application of the “sequential approach” and development from the centre out in order to promote brownfield and infill development, but also to accommodate greenfield development where new residential areas are located contiguous to the existing built-up area, and within reasonable walking distance of social infrastructure and public transport.

Two priority locations are identified for the delivery of this mix of brownfield and greenfield residential development – Priority 1 land being the existing town centre, waterfront area, and infill sites; Priority 2 comprises a significant tranche of undeveloped lands at Abbeylands and Tinahesk to the south-east of the town, and some residential zoned lands to the west of the town.

However, whilst some development has occurred to the west of the town at Lamberton, there has been very little residential development in the remainder of Priority 1 and 2 lands. In particular, the significant tracts of land prioritised for development in Action Area 1 and 2 at Abbeylands and Tinahesk, and also the Waterfront lands have seen no commenced residential development of any kind.

As it stands, under the Core Strategy of the County Development Plan, Arklow retains a significant population and housing growth target compared to other large towns in the county. The lack of commenced housing developments in the area reflects the very low population growth within Arklow Town.

The town is designated to deliver an additional 790 residential units to Q2 of 2028 according to the current LAP and CDP. However, the rate of commencement and completion of residential development during the first half of the County Development Plan life (2022-2025) has been very low.

The Kilbride lands forming Priority 3 in the LAP have been brought forward in planning by our client, a single landowner/developer.

Permission has already been granted (to the Dept of Education) for a significant new education campus including a new primary and post-primary school on a portion of the AAP3 lands. The school permission also includes the first phase of new road into the lands. Our client has also been granted permission for Phase 1.1 of the AAP3 lands for 84 units and is about to commence development for same.

The overall landholding has been subject to a comprehensive masterplan by our client for delivery of c.1,500 residential units over the long term. An Action Area Plan has also been agreed with Wicklow County Council for the phased development of the lands.

The current LRD proposal for 666 residential units and which includes a new local centre (consisting of childcare, retail and community/medical provision) a range of open spaces and active recreation areas and a new pedestrian/cyclist boardwalk/bridge to Arklow town centre, will along with the extant permission for 84 units, deliver 50% of the residential quota for Kilbride over the coming years.

It will be built in a sequential, phased manner with necessary social and physical infrastructure provided in tandem.

The Kilbride lands, located contiguous to the existing residential estates in North Arklow, are ready and primed for development by our client, and can help Arklow achieve its housing and population targets over the life of the County Development Plan, and beyond.

It is evident that the allocated lands in Priority 1 and Priority 2 have not achieved meaningful residential development over the life of the LAP due to a number of factors and barriers to development of those lands e.g. significant road infrastructure requirements, flood risk and mixed land ownerships.

“Exceptional circumstances” therefore exist, and the Priority 3 lands at Kilbride must be given proper consideration and allowed to deliver residential development at scale in order for Arklow to achieve its designated population growth targets over the coming years.

DESCRIPTION OF THE DEVELOPMENT

Site Layout and Design

The application site is part of a larger site which is identified as Action Area Plan 3 Kilbride in the Arklow and Environs Local Area Plan 2018 – 2024. Wicklow County Council approved an Action Area Plan for Action Area 3 on the 2nd of April 2019, in accordance with the documents submitted by McGill Planning Limited.

This first phase of development will provide the new accesses (including the pedestrian link) into the site and the first section of the distributor road, along with the first phase of the local shop and services and 666 residential units on the site.

The Local Area Plan and the Action Area Plan 3 for this site aim to achieve certain outcomes, all of which are addressed through within this application.

The proposal, with its proposed pedestrian and cycle access to the south via the proposed new boardwalk to the south side of the Avoca River will also provide easy access into Arklow Town Centre, while also providing a safe and secure route for pedestrians and cyclists through the site, along the new road to the Kilbride Educational Campus. It will also connect to the permitted pedestrian and cycle link to the east past the Marsh Sports club, ensuring access to this site by foot and cycle. The only vehicular access is to the north, off the Kilbride Road, again using a permitted road under Reg. Ref. 23/756. This proposed development will compliment and further enhance accessibility of the permitted school site and 84 no. residential scheme, providing connections for existing residents in Arklow as well as future occupants of this proposed development.

The site has been laid out in accordance with National policy, in particular DMURS policies and Wicklow County Council Development Plan and Local Area Plans in order to deliver the new road and also achieve high quality open spaces, appropriate density, and layouts across the site.

As set out in the Housing Quality Assessment the development meets the Development Plan and National Standard requirements for the houses in terms of both internal spaces, private open space, and car parking. The back-to-back distances are generally in excess of 22m.

In terms of Daylight & Sunlight it is noted that the proposed development is sufficiently far away from existing neighbouring properties to avoid any issues in relation to loss of light/ overshadowing or loss of privacy. All of the proposed houses, due to the nature of the development providing dual aspect houses with good internal layouts and separation distance, will have good access to daylight and sunlight throughout the development. It is also noted that the proposed apartments and duplex apartments have been tested against BRE Guidelines for sun and daylight standards. These have also achieved an excellent rate with 97% achieving good daylight and sunlight.

Overall development

As highlighted above, this application is for a mixed use scheme providing residential and a local centre. The residential part of the development will consist of 666 units comprising of 578 no. houses; 88 no. duplex apartments and apartments. It will be developed on an area measuring c. 25.07ha gross site area. This will equate to a plot ratio of 0.3:1. The proposed mix of units is in line with national policy guidelines and the Wicklow County Council Development Plan.

A local services centre will provide three retail units, a crèche (with a secure external play area) and three community/ medical units and is located to the northwest of the application site, but which will

be at the centre of the masterplan once phase 2 is developed. These are located to the south of the distributor road within Character Area C. The location of this neighbourhood centre, in close proximity to the distributor road, will not only provide ease of access to the proposed residential development the subject of this application, it will ease of access to the future sports and active open space to the north, and the remainder of the residential development all to be delivered within the second phase of development. Its central location also allows for the future expansion of this neighbourhood centre if it is considered appropriate in the later phasing of the development.

Urban Design Aspects

To provide a sense of place, enable visual diversity and create distinct housing estates, 3 separate architects have been employed to design 4 separate character areas. As a result, there will be a range of residential unit types, styles of buildings, and densities within each of the four areas to create a sustainable and varied mix of units across the development.

In addition to this, NMP Landscape Architects are also developing the overall landscape masterplan for the area ensuring that there is a unified approach to the open spaces, creating clear and permeable pedestrian and cycle linkages throughout the site and ensuring an attractive development which responds to the unique setting on this site. The area to the north provides for a more formal approach to the landscape reflecting its proximity pyramid to a more informal interpretation close to the marsh. It is worth noting that whilst the character areas will differ in expression of design, the hard landscaping materials will be selected from a similar palette in order to create a coherent and legible public realm. This is addressed in further detail within the Design Statement submitted with this pre-application.

The scheme consists of buildings ranging from 2-5 storeys in height, along with single storey outbuildings such as bin and bike stores. The natural topography of the site slopes from north to south towards the marshlands. This variation in height will maintain views across the site, while blending into the existing houses within the vicinity. The highest buildings, at up to 5 storeys, are provided within the local centre in order to create a local marker/ legibility for visitors to the area.

As highlighted above, the site is of considerable size and therefore the creation of distinct character areas is important to ensure maximum variation and to assist in creating a sense of place and visual diversity. Phase 1 has been divided into four different character areas. Each character area contains a range of different densities and landscape types to allow for a sustainable and varied mix across the entire development.

Although each character area has varying expressions of design, it is envisaged that hard landscape materials will be from a similar palette in order to create a coherent public realm. The intention is that the layout will deliver a new residential community, local centre and creches around a series of pedestrian and cycle friendly parks and open spaces with good connectivity to Arklow Town.

It is worth noting that all of the character areas have been laid out to ensure that there is no detrimental impact on the surrounding existing neighbouring development or between the proposed residential units. All of the gardens are sufficiently big to ensure that there is no overlooking or overshadowing between units and that privacy is protected. Any apartments proposed meet the requirements of the national guidelines. All the areas are based on the principle of creating a legible,

liveable communal urban plan with appropriate scale, circulation, density and open spaces ensuring an attractive new community within Arklow. Units are mainly dual aspect, with some units being multiple aspects. A brief description of each of these areas is set out below, however the Design Statement submitted with this pre-application request goes into it in further detail.

Character Areas

In line with the Local Area Plan Area Action Plan 3, four different character areas are proposed, in order to create distinct areas, and provide legibility across the site. These four areas have been designed by three separate architects:

- Area 1A By Conroy Crowe Kelly Architects and Urban Designers
- Area 1B and 1C by Burke Kennedy Doyle Architects
- Area 1D by Hogan Architects and Urban Designers

These areas are all discussed in further detail below.

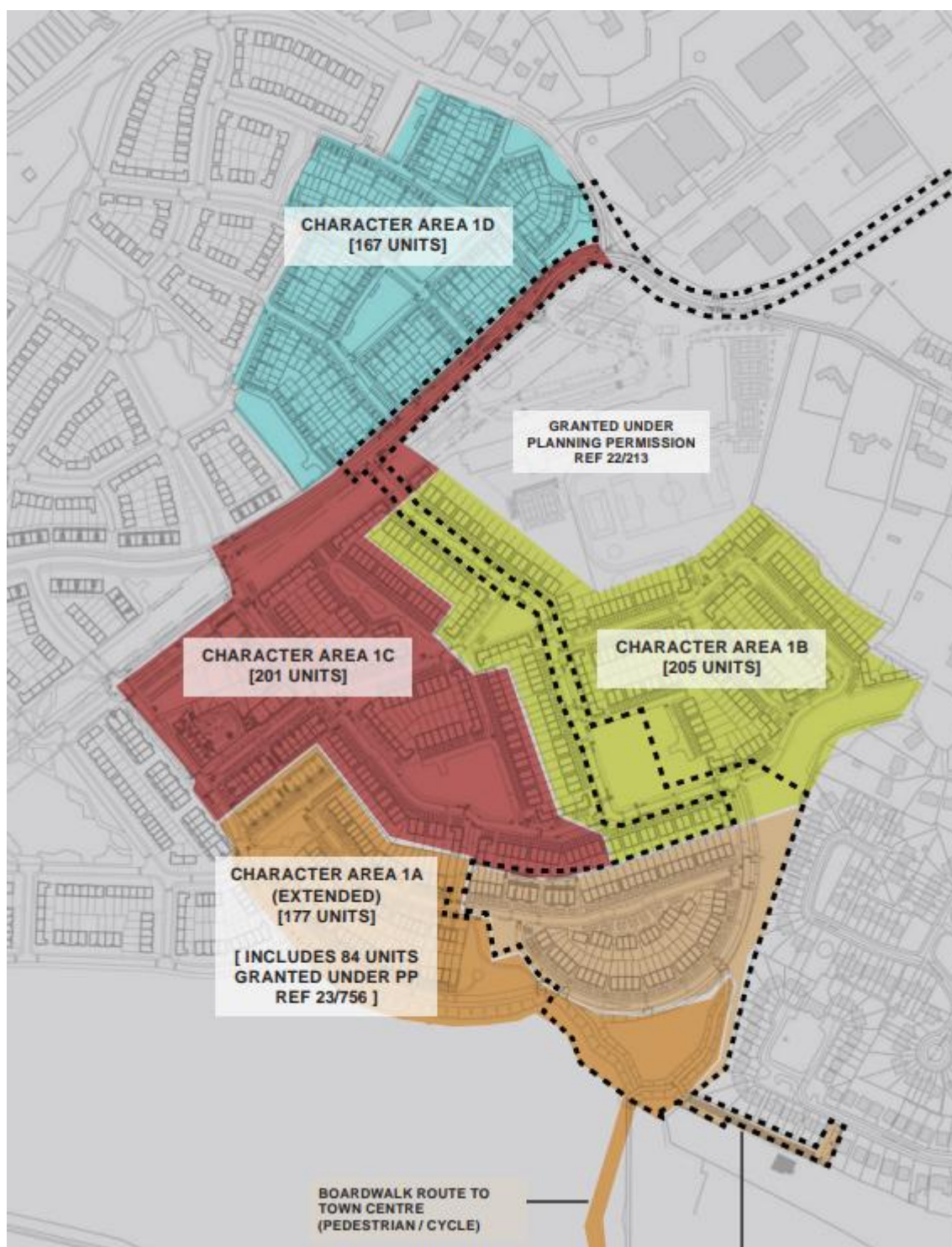


Figure 19 Proposed character areas

Character area 1A is located to the south of the masterplan area and is the lowest lying of all the areas. It is noted that one half of this character area, the area located closest to Avondale Crescent, has already received planning permission for 84 units (Reg. Ref. 23/756). This proposed development is a continuation of the permitted scheme. This area also includes the proposed boardwalk running to the south, across the marsh and the permitted debris traps, linking into the south bank of the Avoca River.

This character area is designed by Conroy Crowe Kelly Architects and Urban Designers and is influenced by both its proximity to Arklow Marsh pNHA, and Arklow town centre. This area takes advantage of its location beside the marsh, which is a valuable and attractive ecological amenity and provides an attractive area to visit and observe.



Figure 20 Character Area 1A

It is abutting the existing residential area of Avondale, Murell Drive and the existing sports grounds. It fronts onto the marsh and has two pedestrian links from the site into Arklow, one travelling east via the permitted pedestrian and cycle route past the Marsh Sports centre and one the proposed Avoca river crossing.

This second phase of character area A will contain 93 no. residential units along with a new park. When combined with the permitted section, a total of 177 A variety of house types and architectural treatments have been proposed throughout this character area including terraces and semi-detached houses and duplex apartments. A range of materials is also proposed in order to provide legibility within this area.



Figure 21 Character Area 1A Street elevation (CCK 2025)



Material Examples



View From Marsh



Typical Green Spaces

Figure 22 Character Area 1A Materials and CGI's (CCK 2025)

The public open space has been laid out to create a green link connecting the site to the marsh, while also providing active water management within this area. Pedestrian routes are provided throughout this area connecting to the neighbourhood centre to the north and west, the school campus to the north, and to the town centre to the east and south.

The boardwalk, which will sit atop the permitted debris traps, makes a dog leg ramp down to the south to meet the south bank of the river. This will integrate with the permitted upgrades to the south bank which have been approved as part of the Avoca Flood Relief works.

Character area B is designed by Burke Kennedy Doyle Architects and is located at the north east of the site and abuts St Jospeh's National school, Murell Drive to the east. To the north of the character area B is the permitted new school campus. To the east of the site is a watercourse. To accommodate a 25m buffer zone all proposed development has been omitted from this location and in its place is a linear park. There is also a potential link to the Dublin Road to the east should this opportunity arise in the future.



Figure 23 Character Area 1B (BKD 2025)

This second phase of development will deliver 205 no. two storey houses and a central open space in addition to the linear route on the east. These proposed open spaces form a network of linked open spaces have been created to provide a pleasant, pedestrian green environment to move through. Priority has been given to pedestrian and cyclist to encourage their movement through the site.

As with character area A, a range of terraced and semi detached house types ranging in size from 2 to 4 bed are proposed. These have a different architectural treatments and material palette to character area 1A and the other two areas to create a sense of place and definition within the overall development.



Figure 24 Character Area 1B Street elevation (BKD 2025)



Figure 25 Character Area 1B Material selection (BKD 2025)



Figure 26 CGI's Character Area 1B

MATERIALS & FINISHES

A palette of grey brick, off-white & dark grey render and slate/concrete roof tiles has been selected for this character area



Character area C, also designed by Burke Kennedy Doyle Architects, is located at the heart of the development to the south of the proposed distributor road and west of area A. This area will have the Local Area Centre which will include amenities such as a crèche and three retail units and three community/ health care units. This area will also provide 201 no. residential units made up of apartments/ duplexes and two storey houses.



Figure 27 Character Area 1C (BKD 2025)



Figure 28 Character Area 1C CGI (BKD 2025)



Figure 29 Character Area 1C Street elevation and materials (BKD 2025)

As part of the development of the Local Area Centre a village square and associated village green is proposed, creating a destination location which could have pop up markets/ events within the area. This area is characterised by storey heights ranging from two to five storey buildings which create a sense of place and enclosures to the spaces. The higher buildings will enable a clear differentiation and legibility from the other character area.



Figure 30 Character Area 1C Neighbourhood centre image (BKD 2025)



Figure 31 Character Area 1C Neighbourhood centre layout (BKD 2025)

Finally, due to the provision of the apartments above blocks 1 and 2 ensures that there is overlooking of the public open space during the day and night. There is also ample parking provided both at surface level and at undercroft level under block 2. This ensures that there is sufficient car and cycle parking within this centre, while also ensure that there is not a sea of surface parking and instead provides attractive central landscaped square which all of the buildings address.

Character area D is the most northern area to come forward. It is designed by Hogan Associates, Architects and Urban Design. This area faces onto the Kilbride Road with its associated houses and industrial estate. It is the site which is nearest the Pyramid of Arklow and a key aim of this area is to maintain views of this important heritage site, and also provide access links to it. It is also directly opposite the permitted school campus.



Area D
Figure 32 Character Area 1D (Hogan 2025)

This phase of development has the added complexity of addressing the proposed distributor road and as such, the houses have been orientated to ensure that they address this road in order to provide it with a strong urban edge. The units along these roads have also been arranged to provide an appropriate relationship with the road for residential housing.



Figure 33 Street elevation of Character Area 1D (Hogan 2025)



Figure 34 Materials example for Character Area 1D (Hogan 2025)



Figure 35 Relationship and level changes with the existing area Character Area 1D (Hogan 2025)

A key element of this site is to maintain and improve views of the Pyramid of Arklow which has been developed by the creation of an axial relationship between the heritage site, Character area A and Arklow town beyond.

The area will result in the demolition of the existing house and associated buildings and will provide 167 no. residential units along with a series of open spaces throughout the area all of which are overlooked. This also prioritises the movement of pedestrians and cyclists around the area and down into the town centre. The proposed park also provides further routes which will connect into future walks in the area and into phase 2 of the development.

As with character area A, B and C, a range of house types, architectural treatments and material palette have been used to create a sense of place and definition within each of the small areas within the character area.

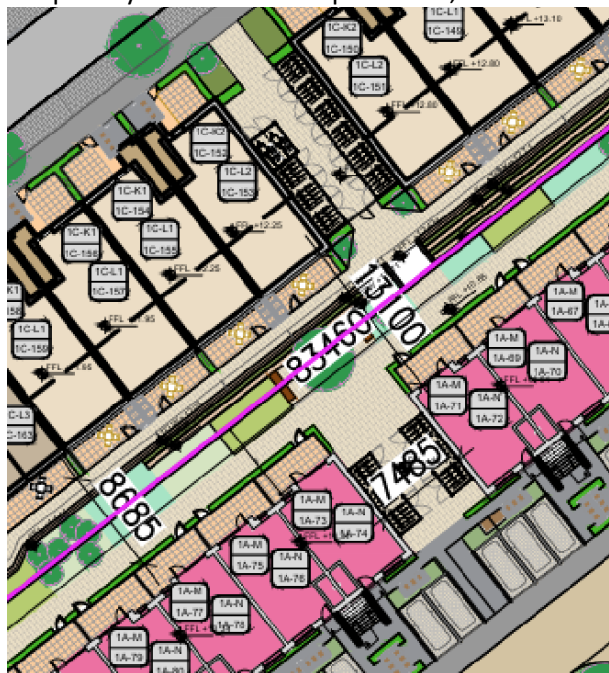
Privacy and Overlooking

All of the proposed units have in all cases have back to back distances in excess of 16m and in most instances in excess of 22m between properties, with some having distances in excess of 28m. where units are used to turn corners of are creating a new street frontage, distances less than 16m can occur however, in these instances the units are not back to back, and are back to gable end. The gable end has either a blank wall or obscure glazing where appropriate.



Figure 36 Privacy and overlooking for corner turning units (Site layout BKD 2025)

Within the duplex apartments, appropriate privacy is ensured through the provision of balcony/terrace screens and through the careful positioning of the units to ensure there is no directly facing windows between these units. It is also noted that there is a stepping in height between these back to back duplex apartments resulting in indirect or angled views between these units only. Therefore the privacy of these units is protected, while enabling an attractive streetscene to the north and south.



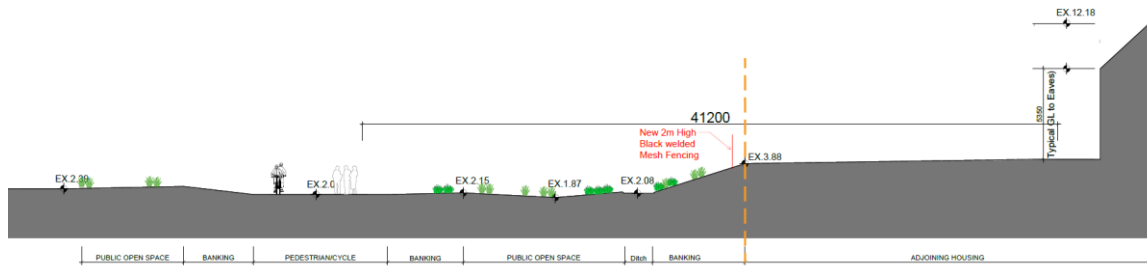
For the existing residential units, there are existing properties opposite Character Area 1D. These properties are in excess of 22m from the proposed properties, with front gardens overlooking this corner turning units. Due to the distance involved, the planting on either side of the existing main

Character Area 1B is adjacent to existing properties along Monument Lane. Again, these properties are located in excess of 22m from the proposed development and there will be no undue overlooking or loss of privacy in relation to these units. Character area 1B also addresses Murell Drive and Carrigmor. Due to the location of this watercourse along this boundary an open space of 25m is proposed, resulting in no housing in this location. Therefore no undue overlooking or loss of privacy will result from this proposed development.



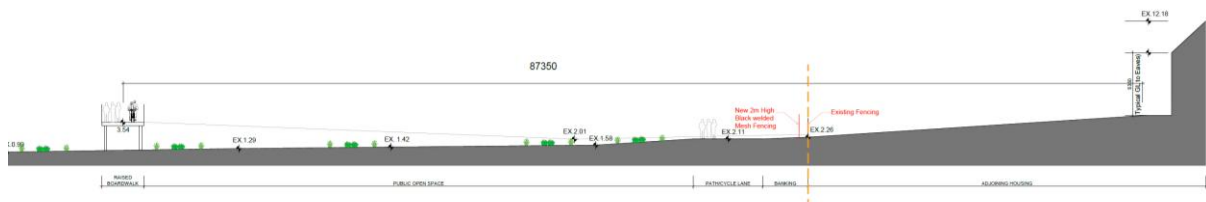
Figure 40 Proposed development and its relationship with existing housing

Finally, the proposed boardwalk to the south of the site will result in a new built structure to the south west of Avondale. The footpaths connecting to this boardwalk located at a lower level than these existing houses. While the boardwalk itself is located c.85m away from the nearest house, and will have both existing and proposed planting located between the boardwalk and the properties. The existing properties are also at an angle to the proposed boardwalk ensuring there is no direct line of sight between the properties and the boardwalk.



SECTION B

Figure 41 Proposed development and its relationship with existing housing



SECTION A

Figure 42 Proposed development and its relationship with existing housing

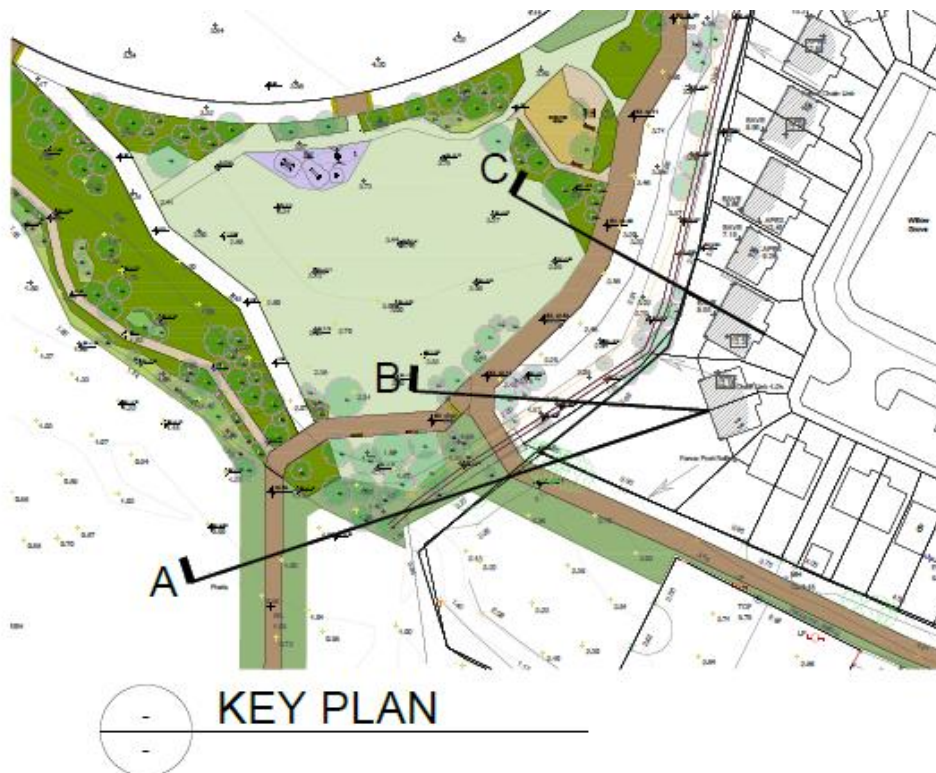


Figure 43 Proposed development and its relationship with existing housing

Unit Mix and Density

The proposed unit type and mix breakdown is as follows:

Unit Type	Unit Size	No. of Units	Percentage
Houses	2 bed	100	17%
	3 bed	317	55%
	4 bed	161	28%
Total Houses		578	100%
Apartments	1 bed	24	27%
	2 bed	51	58%
	3 bed	13	15%
Total Apartments		88	100%

The total unit mix breakdown for the entire development is as follows:

Unit Size	No. of Units	Percentage
1 Bed	24	4%
2 Bed	151	23%
3 Bed	330	49%
4 Bed	161	24%
Total	666	100%

The proposed housing mix includes for 88 apartments or duplex apartments which equates to 13% of the overall number of units. In addition to this, there is a variety of sizes ranging from 1, 2 and 3 bed apartments or duplexes to 2, 3 and 4 bed houses ensuring there is a unit type to accommodate a wide range of preferences. Overall, there is c. 27% of 1 or 2 bed units throughout this proposed development. This is in accordance with the Development Plan.

The existing wider area is generally characterised by low density two storey suburban housing providing three and four bed housing. The provision of smaller sized units, whether apartments, duplex apartments or houses, which are smaller in size, provides an increase mix in this area and is reflective of the current demographic change in Ireland towards smaller household sizes. This proposal will provide for a greater diversity and choice of housing in this area overall.

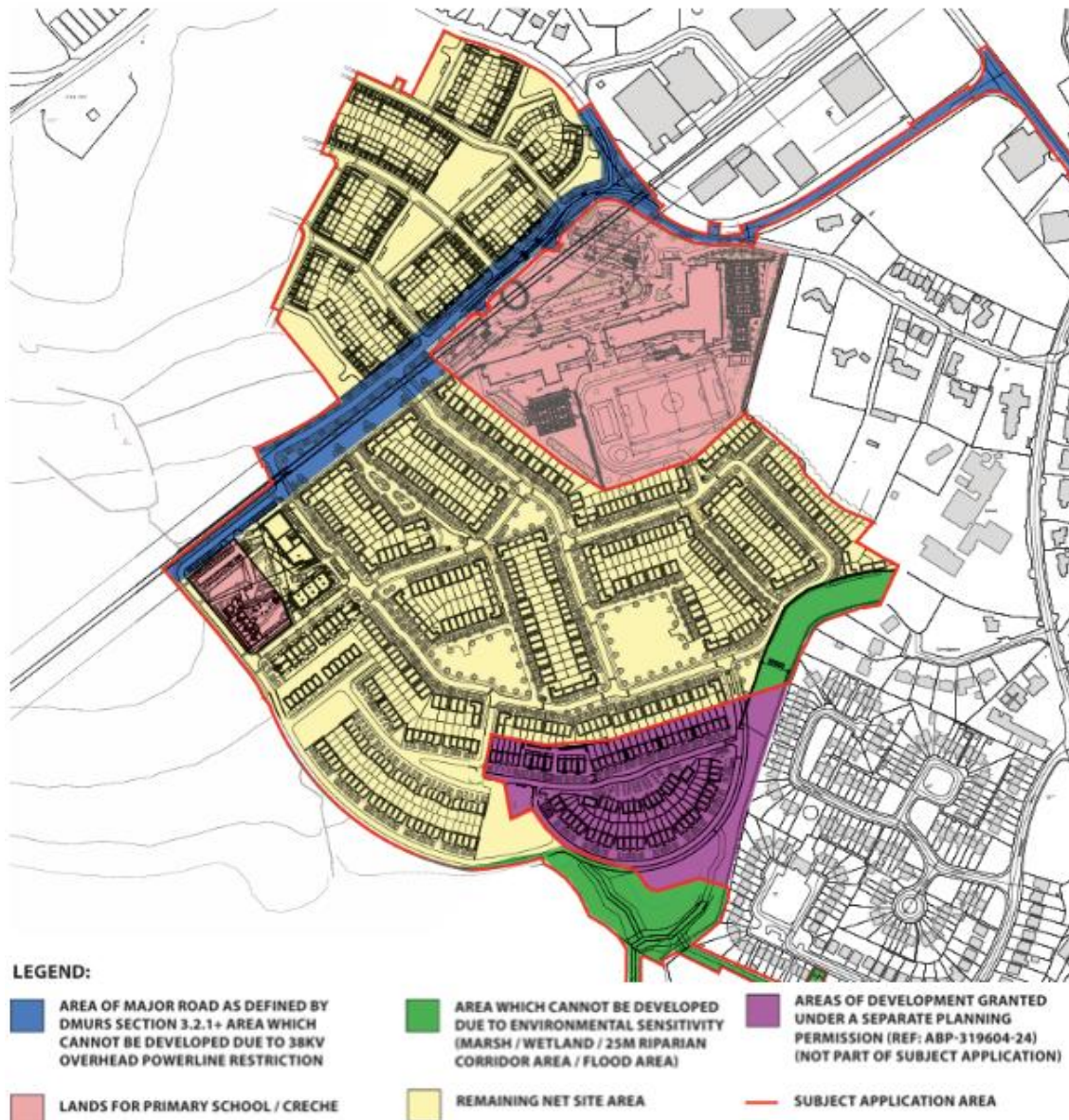


Figure 44 Net site area calculation in line with the Compact Settlement Guidelines (BKD 2025)

The proposed density of the development is c. 35.2 units per hectare based on net development area, excluding the area for the new regional/ link road, the area that cannot be developed for environmental sensitive reasons and the proposed creche area. The remaining land, including all public open space and proposed residential area, including the retail and community uses in the neighbourhood centre have been included in the net site area.

This density, which is higher than the surrounding area, which is characterised by one off houses and lower density suburban estates is considered an appropriate density given the character of the surrounding area. This increase in density and number of houses provides a transition to higher density as you progress into the masterplan lands towards the neighbourhood centre, and other facilities provided. It also makes the best use of this scarce resource, land. This density is in line with the LAP policy, which sets a maximum of 1,500 residential units to be provided on this site.

Parking and Access

This site is well located within the vicinity of existing bus services that operate along the Dublin Road to the East. With the provision of the boardwalk and walk/cycle bridge Arklow Train Station will be within 30mins walk or 10 mins cycle of the development. It is also worth noting that a Park and Ride facility was been granted to the north of the site. The site is also only 1.5km from the Bridgewater and the surrounding facilities which is a 15 minutes walk from the site (the proposed walkway will create even better links). As such it is considered a sustainable site with appropriate levels of proposed car parking and cycle parking proposed reflecting its location and accessibility.

The proposed scheme provides 1,185 no. car parking spaces. Of these, 948 no. car parking spaces in curtilage, and future residents can provide EV parking in these spaces should they wish to. There is a further 178 no. spaces which are residential spaces but are located off curtilage. Of these, c.20%, or 36 spaces are provided as EV charging stations. These spaces equate to 1.69 spaces per dwelling for the houses and c.1 spaces per apartment. This is in accordance with the Development Plan. Finally, there are a further 59 public/ visitor parking spaces which also include for c.20% or 12 EV charging stations.

In terms of bicycle parking, all houses will have their own bike storage within their curtilage. For apartments and duplexes along with the neighbourhood centre there will be space for 266 no. bicycles within stores which is in excess of the 244 no. spaces required.

Vehicular access is proposed from the Kilbride Road L-6179 along the northern boundary and will tie in with the proposed design permitted for both the 84 no. unit development to the south east of the site along with the Kilbride Educational Campus. This road will provide pedestrian and cyclist facilities the entire way down through the site, out to the Dublin Road. This will enable an alternative route for future pupils of the school from Arklow Town which has dedicated pedestrian and cycle links, which is a significant benefit to the school site as well as the subject application.

Systra Consulting Engineers have produced a Traffic and Transport Assessment that has assessed the potential impact on the existing local transportation network and to ensure that the proposed site access and the existing junctions will have adequate capacity to carry the development traffic and the future growth in existing road traffic. The report concludes that the surrounding road network and adjacent existing junctions will have sufficient operational capacity to accept the proposed development traffic.

The proposal incorporates one main shared access routes for vehicles, pedestrians and cyclists into the site via a new distributor road alignment which will connect the Kilbride Road L-6179 through the site. In the future the distributor road will extend to the western end of Arklow town south of the Avoca River via a new bridge (subject to future application).

A pedestrian/ cycle, boardwalk connection to Arklow town, which is free from all vehicular traffic is also proposed. This route will run through the main marsh into the site and will form a bridge on top of the OPW permitted debris traps providing direct access to Arklow Main Street.

These links/ green route provides permeability for pedestrians and cyclists through the marsh and provides safe and easy access to Arklow town. It makes a connection with the existing greenway and will be made accessible to the local community to engage with and enjoy and will become part of the wider context of walking trails.

A hierarchy of roads and routes are proposed and all the proposed new junctions, roads and links have been designed in accordance with the Design Manual for Urban Roads and Streets guidelines to cater for the anticipated vehicle, cyclist and pedestrian demand within the development. The layout ensures that traffic speeds are minimised and the pedestrian is favoured. Home zones are also provided within each area to prioritise pedestrian movement and enhance the quality of the street.

Open Space and Arboricultural Assessment

The proposed development provides a series of parks and landscaped spaces throughout the plan within easy walking distance of all residential units. Each area is distinctive and reflects the character of the area which it is located within. Key influencing factors in the scheme includes the natural constraints of the site in terms of the Arklow town marshlands, mature trees and the topography of the site. This has helped to form a series of public and communal open spaces with attractive features which profiles high amenity value.

All open spaces are overlooked by housing units. These areas contain a variety of spaces to enjoy including children play areas, rain gardens, woodlands, communal gardens. All open spaces are easily accessible with strong pedestrian links to the proposed residential units and to the existing neighbouring sites.

All of the units have access to a private garden, balcony or terrace. These areas of private open space have been located to ensure that they have sufficient privacy as to enable the enjoyment of future residents of these units. At ground floor level additional planting has been provided as a buffer zone to these private spaces to ensure that they are useable, enjoyable spaces to be in.

As can be seen from the landscape drawings, a large quantity of high quality landscaped open space has been incorporated into the scheme. There is c. 3.35ha of public open space (17.7% of the site area). This does not include the "March Ecological Public Park". All of these areas of public open space are directly overlooked by homes, providing attractive, passively surveilled areas for people to enjoy.

The proposed layout creates a series of natural routes within the masterplan. There are dedicated landscaped routes provided for pedestrians and cyclists which deviate from the street pattern for improved security safety. These routes link together the green spaces within the development and offer the opportunity for connection between the adjoining communities both within each of the existing community and the proposed character areas.



Figure 45 Proposed Open Space provision (NMP 2025)

Each of the houses has access to private open space which meets or exceeds the Wicklow Development Plan Standards. For the duplex apartment, they also have dedicated communal open space provided located to the north of the two blocks. The apartments within the town centre do not have direct access to communal open space and instead overlook the public open space that the town centre buildings frame. As a result, an enlarged private balcony has been provided for each property. This includes the minimum requirement for a private balcony and communal space as set out in the Apartment Guidelines and the Wicklow County Development Plan. Each apartment has a minimum of 11sqm balcony, with some balconies achieving c.25m, resulting in very attractive, useable amenity space, while still having the benefit of overlooking and using a large public open space.

It is noted that the public open space to the east abuts a farmer's ditch, separating the application site from the existing neighbouring residential. This is being retained, with additional planting of native hedgerows and trees and landscaping. This results in all of the proposed housing being a minimum of

c.41m away from the existing houses to accommodate the retention of this ditch. All houses are at least c.25m away from this ditch with footpaths located c. 20m away. The proposal also includes the retention of the existing hedgerow and planning along with additional planting to augment the existing.

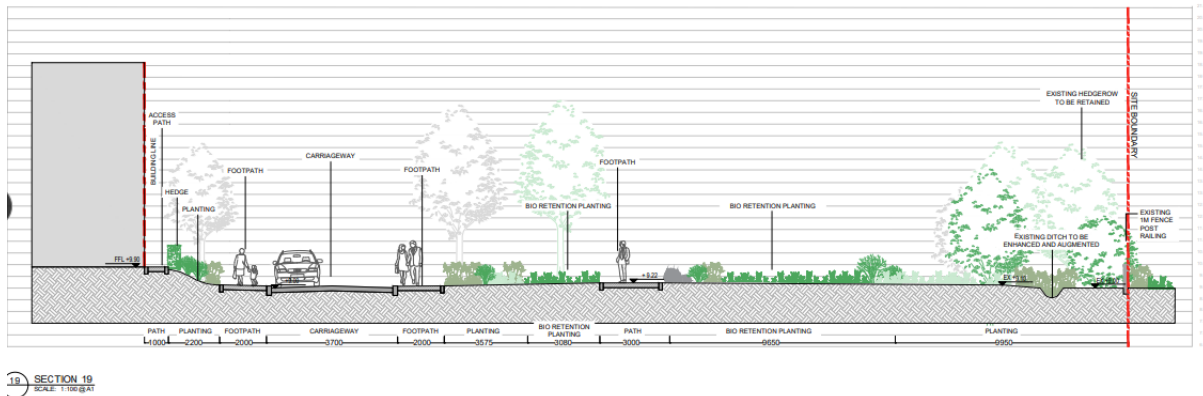


Figure 46 NMP Section indicating the protection of watercourses

Trees

Green Tree Arborist Services have completed an Arboricultural Impact Assessment for this proposed development. This states that *"The majority of the trees assessed were deemed to be trees of medium or low quality and are classified as category B or C trees. The majority of the trees are part of the older hedgerows that run throughout the site."*

There are 5 category B trees, two Sycamore and three Oaks, 1 category B group of riparian trees (GO1) and 29 category C are proposed for removal due to being in direct conflict with the proposed design layout.

There are 20 category U trees recommended for removal based on their physiological and structural condition. Of the 20 trees ten are Ash with seven heavily infected with Ash Dieback. The trees T379 through to T384 and the trees T447 and T448 have all been severely 'topped' or had half their canopies removed due to the presence of overhead ESB wires.

There are 7 hedgerows to be removed and sections of the hedgerows H1, H8, H15 and G01.

All trees identified to be removed are highlighted in red in the tree protection plan.

Of the 15 individual trees to be retained on site there are five category B and ten category C trees. Four of the five category B trees are important mature Oak trees and there are six category C Oak trees retained. Only six Oak trees are to be removed from the site due to conflict with the proposed design layout."

Compliance with Part V

The applicant has commenced discussions with the Housing Department of Wicklow County Council in respect of Part V. An outline proposal has been submitted regarding the provision of 66 no. units on site. These units are indicated on the associated plans along with costings submitted.

Ecology & Appropriate Assessment

An Appropriate Assessment screening has been carried out by Altemar. The screening concluded that the following:

The nearest European site is the Buckroney- Brittas Dunes and Fen SAC (4.1km). The nearest watercourse is a small tributary of the Avoca River located along the southeastern boundary of the site. In the absence of standard mitigation measures works within the Marsh could lead to silt or pollution entering the Avoca River. The drainage from the Marsh outfalls to the Arklow Town Marsh and ultimately the marine environment via the Avoca Estuary. Any pollutants, silt laden run off that enter the watercourse would be dispersed or diluted within the Avoca Estuary and the marine environment to negligible levels prior to reaching any European sites. There are no Special Protected Areas (SPAs) within 15 km of the site boundary. Noise pollution created during the construction of the residential development will be localised to the immediate site area and will not have a likely significant effect on the conservation objectives of the features of interest of any European sites.

Surface water which enters Arklow Town Marsh via the Avoca River tributary, will enter the adjacent Avoca Estuary and ultimately the marine environment. Flocculation and estuarine circulation patterns will occur within the Avoca Estuary. It should be noted that a 25m Riparian Buffer will be implemented from the adjacent watercourse along the eastern boundary of the subject site (outside the site outline). In the absence of mitigation, pollutants, silt laden run off or dust which enter the surface water network will be dispersed or diluted within the estuary and the marine environment, to negligible levels, prior to reaching any European sites. Foul wastewater will be directed to the Arklow Wastewater Treatment Plant (WWTP). The Arklow WWTP is currently under construction and is due to be completed in Q1 of 2025. Foul wastewater drainage will ultimately be treated along this public network. The treated effluent from the new Arklow WwTP will discharge to the Irish Sea. There will, therefore, be an indirect pathway from the proposed development site to European sites within the Irish Sea (Specifically: Buckroney Brittas Dunes and Fen SAC, Kilpatrick Sandhills SAC, Magherabeg Dunes SAC).

Having taken into consideration foul and surface water drainage from the proposed development, the distance between the proposed development to designated conservation sites, lack of direct hydrological pathway or biodiversity corridor link to conservation sites, and the dilution effect with other effluent and surface runoff, it is concluded that the proposed development would not give rise to any significant effects to designated sites. The construction and operation of the proposed development will not impact on the conservation objectives of qualifying interests of European sites.

This report presents a Stage 1 Appropriate Assessment Screening for the Proposed Development, outlining the information required for the competent authority to screen for appropriate assessment and to determine whether or not the Proposed Development, either alone or in combination with other plans and projects, in view of best scientific knowledge, is likely to have a significant effect on any European or European site.

Based on the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

Infrastructure

As set out in the Infrastructure Design Report by DOBA Consulting Engineers, in line with the GSDS, SUDS and WCC Development Plan it is proposed to provide a treatment system aimed at enhancing

the quality of the surface water through intercepting rainfall and other run off and treating it prior to entering the watercourses. Please see the DOBA Consulting Engineers Report with regard to details on proposed SuDS elements, surface water drainage and associated measures.

Housing Mix Justification

Wicklow County Council raised the housing mix in the opinion stating, *"The housing mix should be justified to show that a suitable range of units are being provided"*.

The previously proposed unit mix within the pre-application consultation request for 750 no. units was as follows, with 15% of the scheme made up of 1 and 2 bedroom units:

Unit Size	No. of Units	Percentage
1 Bed	14	2%
2 Bed	100	13%
3 Bed	459	61%
4 Bed	177	24%
Total	750	100%

The revised proposal includes 27% 1 and 2 beds units. This reflects a greater increase in smaller units to reflect smaller household formation. This is considered an appropriate housing mix for the area which is predominantly suburban family homes. This mix introduces some smaller age friendly / starter accommodation within the duplex apartments, apartments and two bed houses catering for smaller residential and family units within the area along with larger family homes.

The proposed unit mix is as follows:

Unit Size	No. of Units	Percentage
1 Bed	24	4%
2 Bed	151	23%
3 Bed	330	49%
4 Bed	161	24%
Total	666	100%

When the permitted 84 units scheme, WCC Reg. Ref. 23/756 the mix for this first phase of development will be as follows:

Unit Size	No. of Units	Percentage
1 Bed	32	4%
2 Bed	162	21%
3 Bed	395	53%
4 Bed	161	22%
Total	750	100%

The Wicklow County Development Plan 2022-2028 does not specify a target housing mix. However, policy CPO 6.27 states *"To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020)"*.

The proposed development aims to provide housing for a range of age groups, tenures and family sizes. This will enable a mixed community to grow in this location. To facilitate this end goal the

proposal includes 1, 2, 3 and 4 bedroom residential units in the form of houses, apartments and duplexes. The proposal also includes 10% part V units in line with the CDP.

The mix proposed is considered to be an appropriate reflection of the existing mix in the area, balanced against the need for smaller housing types. The proposed housing mix is firmly grounded in local demographic data and household trends, as illustrated in the CSO data in the graphs below.

According to CSO data, over 45% of existing housing stock in Arklow is 3-bedroom units, with a further almost 20% comprising 4-bedroom homes. This suggests that family-sized dwellings are both well-established and in demand locally. Our proposed mix aligns with this existing pattern, offering modern, energy-efficient alternatives that meet current lifestyle needs for example remote working and multigenerational living.

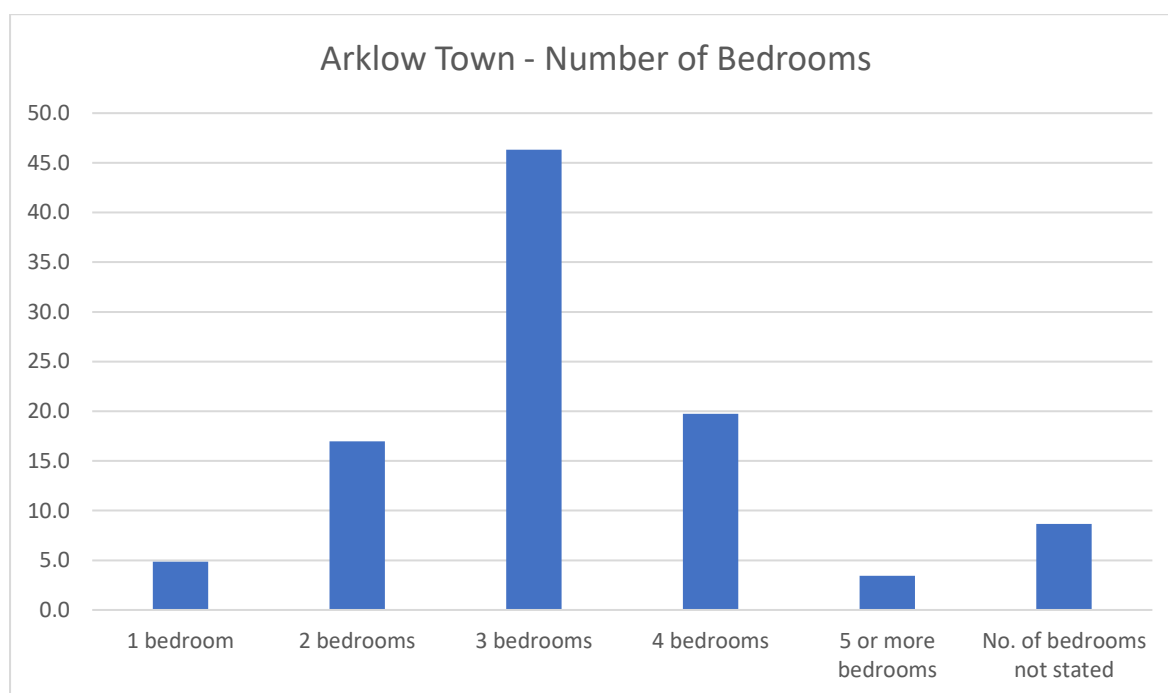


Figure 47 Arklow Town Bedroom Numbers existing

As shown in the household size graph below, over 65% of households in Arklow consist of 3 or more persons, with 4-person households being the most common. This demographic trend clearly supports the need for family-sized accommodation. This underscores that the need for larger homes is not speculative, but reflective of the actual size of local households.

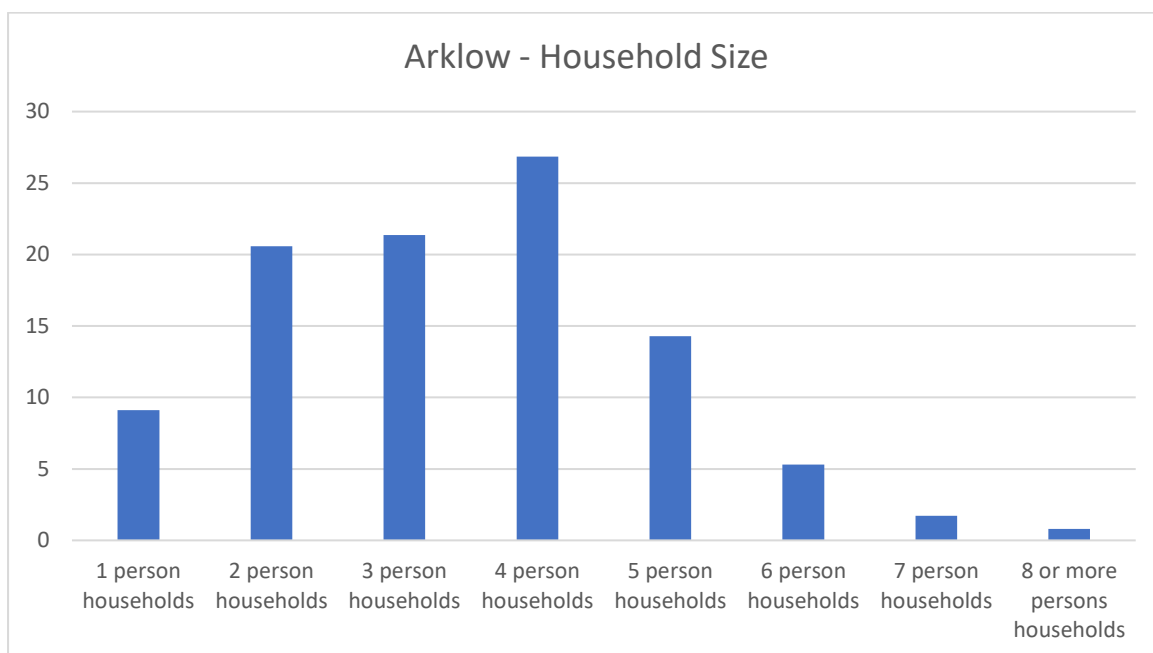


Figure 48 Arklow Town Household size

Furthermore, according to the 2022 CSO data, almost one quarter of Arklow residents (23%) now work from home. This shift has increased the need for additional, flexible space within the home that can accommodate home offices, particularly for families and professional couples. Three- and four-bedroom units are best suited to meet this demand, offering adaptability for growing families, multigenerational households, or remote work arrangements. With this in mind, many of the proposed 3- and 4-bed units are designed to be flexible and adaptable, capable of accommodating home offices, playrooms etc.

While the scheme provides family-sized homes, it is important to highlight that 27% of all units are 1- and 2-bedroom dwellings. This represents a significant and balanced provision of smaller units within the development and directly responds to the needs of a diverse population in Arklow, including singles, couples, older residents, and first-time buyers.

STATEMENT OF RESPONSE TO WICKLOW COUNTY COUNCIL LRD OPINION

An LRD Meeting, planning authority reference LRD PP24/31, was held on the 18th December 2024 at Wicklow County Council's County Buildings. Following this LRD Meeting under section 32 of the Act, the council were required to provide an Opinion as to whether or not the documents submitted for the purposes of the meeting constitute a reasonable basis on which to make an application for permission for the proposed LRD under Section 32D of the Act.

Following consideration of the issues raised during the LRD meeting the Planning Authority issued its Opinion on the 21st of January 2025. This confirmed that the documents submitted with the request for the LRD Meeting *"do not constitute a reasonable basis for an application for a Large Scale Residential Development"* for the following reason:

	Opinion Item	Response
1	Density. The overall density at 31 uph would not represent an appropriate use intensity of development for the lands.	<p>As set out above, the proposed development includes for an increased density of 35.2 units per hectare across the site. This is as a result of an introduction of an increased number of smaller units including 1 and 2 bedroom houses, apartments and duplex apartments equating to c. 27% of the overall proposed development.</p> <p>In line with the Sustainable and Compact Settlement Guidelines, this site is considered, as set out in section 3.3.3, a Key Towns and Large Towns (5,000+ population). In terms of categorisation of this site, it would be our opinion that the subject site would fall under the definition of Key Town/ Large Town – Suburban/ Urban Extension which is defined in the guidelines as follows: <i>"Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as</i></p>

		<p><i>defined in Table 3.8).</i>" (McGill Planning Ltd emphasis)</p> <p>Section 3.4 further refines the density of development with regard to the proximity and accessibility to services and public transport. Under table 3.8 lands are defined as</p> <ul style="list-style-type: none"> - High-Capacity Public Transport Node or Interchange - Accessible Location - Intermediate Location - Peripheral Location <p>Under this criteria this site would not be considered to be within 500-1000m walking distance of existing or planned high frequency urban bus services or 500 meters of reasonably frequent urban bus service and as such can be considered Peripheral, as it does not meet the accessibility or proximity criteria above.</p> <p>The proposed density is considered appropriate given the site size, location, and context of the surrounding built residential environment, which is predominantly either two storey houses within an estate of single, one off housing. The proposed density allows for the sustainable development of the site whilst providing much needed unit types close to Arklow Town Centre.</p> <p>The proposed development is located on suitably zoned mixed use land which is requires residential led development.</p> <p>The density requirement set out by the current County Development Plan and national guidance have been complied with when designing the scheme. The site layout maximises permeability through appropriate urban block sizes, building heights, and connectivity.</p> <p>Careful consideration has been given to adjoining levels of residential amenity ensuring appropriate distances are maintained and environmental sensitivities such as the marsh to the south and the ditch to the east are</p>
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		<p>protected. The proposal also accommodates a new regional/ link road through the site, which is a further constraint on the development of this site.</p> <p>Therefore, given the constraints of the site, including its topography and environmental sensitivities, it is considered that the proposed density of 35uph net is appropriate to this development.</p>
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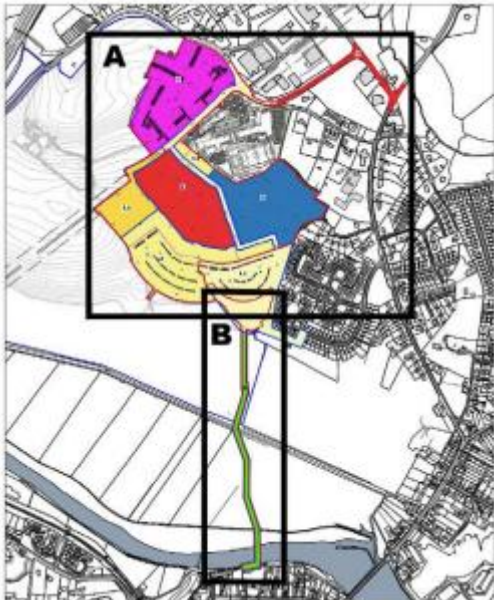
In accordance with Section 32D of the Act, WCC considers that the following matters need to be addressed by the relevant documents, which could result in the documents constituting a reasonable basis on which to make an application:

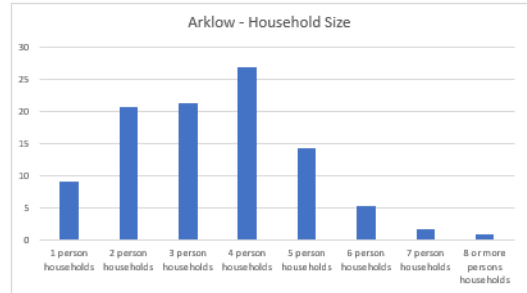
	Opinion Item	Response
A	<p>Core strategy.</p> <p>Justification of the development to show that given permitted development that this development would not undermine/ materially contravene the Core Strategy for Arklow as set out in the CDP 2022-2028</p>	<p>As set out above, there is ample justification and capacity to permit the Kilbride LRD proposal for 666 units. An unparalleled new residential community in Arklow that will also deliver significant physical and social infrastructure for the town including a new boardwalk across the Arklow Marsh and Avoca River, and a new local centre, along with pedestrian and cycle connections to the permitted school campus.</p> <p>The rate of housing delivery over the life of the Development Plan has been extremely low, and despite additional residential permissions been granted, particularly with the LRD proposal on the opposite side of the town at Tinahask; to date, none of these permissions have commenced.</p> <p>It is unclear why none of these permissions have commenced, particularly given that the new WWTP has been in operation since last year and during when the development levies rebate scheme was available to developers.</p> <p>As it stands and based on recent trends it would appear likely that the housing target for Arklow in the Core Strategy will therefore not be achieved and will fall far short of same.</p>

		<p>It is therefore critical that accommodation is made for additional viable planning permissions that can help deliver the Core Strategy Housing Target for the town.</p> <p>The above report demonstrates that the Kilbride LRD will not undermine or contravene the Core Strategy for Arklow, but in fact will significantly help achieve the housing target of 790 additional residential units by Q2 2028 when the current Development Plan expires.</p>
B	<p>Phasing.</p> <p>Justification of the development having regard to the location of AAP3: Kilbride lands within Priority Area 3, in advance of Priority Area 1 and Priority Area 2 as set out in the Appendix D: Phasing and Implementation of the Arklow and Environs LAP 2018. The development of these lands could it is considered represent a material contravention of the Arklow and Environs LAP, and the provisions of the County Development Plan 2022-2028 in respect of lands in a sustainable manner.</p>	<p>The 2018-2024 Arklow LAP outlines a Phasing Strategy for the development of residential zoned lands based on the application of the “sequential approach” and development from the centre out in order to promote brownfield and infill development, but also to accommodate greenfield development where new residential areas are located contiguous to the existing built-up area, and within reasonable walking distance of social infrastructure and public transport.</p> <p>Two priority locations are identified for the delivery of this mix of brownfield and greenfield residential development – Priority 1 land being the existing town centre, waterfront area, and infill sites; Priority 2 comprises a significant tranche of undeveloped lands at Abbeylands and Tinahesk to the south-east of the town, and some residential zoned lands to the west of the town.</p> <p>However, whilst some development has occurred to the west of the town at Lamberton, there has been very little residential development in the remainder of Priority 1 and 2 lands. In particular, the significant tracts of land prioritised for development in Action Area 1 and 2 at Abbeylands and Tinahesk, and also the Waterfront lands have seen no commenced residential development of any kind.</p>

		<p>As it stands, under the Core Strategy of the new County Development Plan, Arklow retains a significant population and housing growth target compared to other large towns in the county. The lack of commenced housing developments in the area reflects the very low population growth within Arklow Town.</p> <p>The town is designated to deliver an additional 790 residential units to Q3 of 2028 according to the current LAP and CDP. However, the rate of commencement and completion of residential development during the first half of the County Development Plan life (2022-2025) has been very low.</p> <p>The Kilbride lands forming Priority 3 in the LAP have been brought forward in planning by our client, a single landowner and established developer in the County.</p> <p>Permission has already been granted (to the Dept of Education) for a significant new education campus including a new primary and post-primary school on a portion of the AAP3 lands. The school permission also includes the first phase of new road into the lands. Permission has been granted permission for Phase 1.1 of the AAP3 lands for 84 units and is understood will commence presently.</p> <p>The overall landholding has been subject to a comprehensive masterplan by our client for delivery of c.1,500 residential units over the long term. An Action Area Plan has also been agreed with Wicklow County Council for the phased development of the lands.</p> <p>The current LRD proposal for 666 residential units and which the provision of a new local centre (consisting of childcare, retail and community/medical provision) a range of open spaces and active recreation areas and a new pedestrian/cyclist boardwalk/bridge to Arklow town centre, will along with the extant permission for 84 units, deliver 50%</p>
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		<p>of the residential quota for Kilbride over the coming years.</p> <p>It will be built in sequential, phased manner with necessary social and physical infrastructure provided in tandem.</p> <p>The Kilbride lands, located contiguous to the existing residential estates in North Arklow, are ready and primed for development by our client, and can help Arklow achieve its housing and population targets over the life of the County Development Plan, and beyond.</p> <p>It is evident that the allocated lands in Priority 1 and Priority 2 have not achieved meaningful residential development over the life of the LAP due to a number of factors and barriers to development of those lands e.g. significant road infrastructure requirements, flood risk and mixed land ownerships.</p> <p>“Exceptional circumstances” therefore exist, and the Priority 3 lands at Kilbride must be given proper consideration and allowed to deliver residential development at scale in order for Arklow to achieve its designated population growth targets over the coming years.</p>
C	<p>Boardwalk/ Bridge</p> <p>Further details are required in respect to the methodology of construction of the Boardwalk/ Bridge to ensure that the hydrology/ ecology of the marsh which is designated as a pNHA is protected.</p>	<p>Please see the Greenway Boardwalk Outline Construction Methodology Plan which is included with this pack along with the drawings by DOBA showing the sections of this development. The proposed boardwalk will rest on top of the permitted debris traps under the Arklow Flood Relief scheme and will tie in with the works to the southside of the Avoca Rive.</p> <p>In addition to this, and as set out in the Construction Environmental Management Plan by Altamar appropriate measures are proposed to avoid/ minimise or mitigate any potential impacts as a result of this proposed boardwalk. These will be implemented in full upon grant of planning permission.</p>
D	Phasing/ Timing.	As set out in Section 3.4 of the Architects Design Rationale the proposed construction

	<p>Phasing plan to identify unit numbers/ development for each phase, and all the associated infrastructure upgrades, pedestrian and cycle connectivity, communal/ POS, landscaping and social/ educational infrastructure to service the level of development identified.</p> <p>Confirmation of timings of infrastructure works, outside of application that are required for the development</p> <ul style="list-style-type: none">- Debris trap- Foul sewer- Public water upgrade	<p>sequence is indicated, commencing from the south east of the site.</p> <table><tr><th colspan="5">CONSTRUCTION SEQUENCE</th></tr><tr><th>Build Phase</th><th>No. of Units (Phase)</th><th>No. of Units (Total)</th><th>Part V Units (Phase)</th><th>Part V Units (Total)</th></tr><tr><td>1.1</td><td>84</td><td>(84)</td><td>9</td><td>(9)</td></tr><tr><td>1.2</td><td>181</td><td>(265)</td><td>10</td><td>(19)</td></tr><tr><td>1.3</td><td>38 + Local Centre</td><td>(303)</td><td>26</td><td>(45)</td></tr><tr><td>2</td><td>141 + Beech Rd. Junction Upgrade</td><td>(444)</td><td>2</td><td>(47)</td></tr><tr><td>3</td><td>139</td><td>(583)</td><td>15</td><td>(62)</td></tr><tr><td>4</td><td>167</td><td>(750)</td><td>13</td><td>(75)</td></tr><tr><td>*</td><td colspan="4">Boardwalk to be delivered within 1 year of completion of Avoca river debris trap</td></tr></table> 	CONSTRUCTION SEQUENCE					Build Phase	No. of Units (Phase)	No. of Units (Total)	Part V Units (Phase)	Part V Units (Total)	1.1	84	(84)	9	(9)	1.2	181	(265)	10	(19)	1.3	38 + Local Centre	(303)	26	(45)	2	141 + Beech Rd. Junction Upgrade	(444)	2	(47)	3	139	(583)	15	(62)	4	167	(750)	13	(75)	*	Boardwalk to be delivered within 1 year of completion of Avoca river debris trap			
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E	<p>Housing mix.</p> <p>The housing mix should be justified to show that a suitable range of units are being provided and are appropriate for the housing need in Arklow</p>	<p>Section 12 of the Infrastructure Design Report sets out the phasing and timing of the proposed infrastructure works outside of the application boundary that are requested for the development. The details are:</p> <ul style="list-style-type: none">- Debris trap- Foul sewer- Public water upgrade <p>The revised proposal includes 27% 1 and 2 beds units. This reflects a greater increase in smaller units to reflect smaller household formation. This is considered an appropriate housing mix for the area which is predominantly suburban family homes. This</p>																																													

		<p>mix introduces some smaller age friendly / starter accommodation within the duplex apartments, apartments and two bed houses catering for smaller residential and family units within the area along with larger family homes.</p> <p>The proportion of smaller unit types is balanced against the Census 2022 information which reflects that over 65% of households in Arklow consist of 3 or more persons, with 4-person households being the most common. This demographic trend clearly supports the need for family-sized accommodation. This underscores that the need for larger homes is not speculative, but reflective of the actual size of local households.</p>  <p>Therefore, this proposed unit mix, with 27% 1 and 2 bed units, in the form of houses, apartments and duplex apartments, provides a variety of choice and is considered a balanced provision of smaller units within the development and directly responds to the needs of a diverse population in Arklow, including singles, couples, older residents, and first-time buyers.</p>
F	Protection of residential amenities. Impacts on adjoining residential development should be clearly set out and assessed in the documents	<p>As set out above, the proposed development is located on greenfield site with significant distances in excess of 22m from all existing housing. In addition to this there are existing boundary treatments which are being retained or enhanced as part of this development further ensuring the existing residential amenities are protected.</p> <p>Within the proposed development, the majority of proposed units are separated by a back to back distance of at least 16m with the majority of units separated by 22m of more.</p>

		<p>Where properties are closer, due to urban design requirements such as corner turning units, the proposed houses do not have back to back windows directly overlooking each other. These relationships are generally designed to be back of house facing a gable end and enables an appropriate streetscene.</p> <p>There are also duplex apartments which are within c.14m of each other. However, due to the difference in height/ stepping of the site, the difference in the proposed units, and the positioning of the units ensures there is no direct overlooking between duplex apartments. Privacy are further protected in these units through the provision of appropriate balcony rails to the terraces.</p>
G	<p>Creche</p> <p>A design statement for the proposed creche should be submitted and in this regard, the input of Wicklow County Childcare should be sought in respect of the childcare facility design.</p>	<p>The Architectural Design Rationale includes a proposal for the creche design. This is also reflected in the creche drawings.</p> <p>In addition we have been in touch with the Wicklow County Childcare Committee. They have confirmed via email (Appendix A) that there is a requirement for childcare places across all age groups and types of provision. They have highlighted that due to the size of the property there is flexibility. The proposal reflects some of these suggestions. Any future operator of this facility can further alter the layout dependent on their operational requirements.</p>
H	<p>Part V</p> <p>Full details in respect to compliance with Part V requirements, which should address the requirements of the Housing Section in WCC</p>	<p>The proposed development includes Part V provision of 66 residential units across the development.</p> <p>The proposed units are generally in accordance with the advice of the Housing Section in WCC. However, this can be dealt with by way of conditions.</p>
I	<p>Traffic and Transport</p> <p>The documents in respect of Traffic and Transport should be supplemented by information to address the concerns raised by the Roads Section in the attached Report</p>	<p>Please see the Traffic Impact Assessment by Systra which address the comments relating to traffic.</p> <p>In addition to this a Quality Assessment has been completed by Traffico. Any items raised have been addressed by DOBA.</p>
J	<p>Watercourse</p> <p>Additional details to confirm the protection of the existing watercourse</p>	<p>As indicated in the site layout plan by BKD Architects and also in the drawings and sections by NMP Landscape Architects a</p>

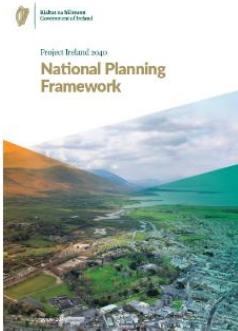
	having regard to the provisions of the publication by Inland Fisheries Ireland Planning for Watercourses in the Urban Environment and Objective CPO 13.3 and CPO 17.26	25m buffer zone has been provided from the existing watercourse to the east. This is fully in accordance with the Urban Environment and Objective CPO 13.3 and CPO 17.26.
K	Surface Water The inclusion, as far as reasonable possible, the nature based surface water solutions in the surface water design	Nature Based SuDS features have been incorporated within the development. These are shown within the NMP Landscape Design as well as section 7 of the Infrastructure Design Report by DOBA.
L	Flooding Flood modelling to identify impact of bridging works on the Avoca River Flood Scheme	a Site Specific Flood Risk Assessment has been completed by DOBA. In addition to this a Hydrological Report has also been completed by AWN. These reports include an assessment of any existing flooding within the area and also the impact of the bridging works over the Avoca River. It should be noted that the majority of the works are resting on the permitted debris traps associated with the Arklow Flood Relief works. There is only a small area which includes in water works which are adjacent to the south bank of the Avoca River. These are limited in nature and will not have a detrimental impact on the Avoca River Flood Scheme.
M	Biodiversity Enhancement Plan should be submitted as part of any application	A Biodiversity Enhancement Plan has been completed by Altamar and is submitted with this application.
N	Full details of all retaining features and all remodelling works to the lands should be provided as part of the application details	DOBA have completed an assessment of the cut and fill proposed across the site, along with any remodelling works. This has been kept to a minimum and the buildings and roads step in accordance with the site. Where retaining features are required these are indicated in section 6 of the Infrastructure Design Report. This, along with the associated drawings, indicated typical retaining features where required.
O	The overall layout and landscaping details in respect to the open/ communal space is generally acceptable. In any future application it should be clearly indicated how the provision of the communal/ public open space will tie in with the overall phasing of development. Any application should in addition clearly outline the areas of communal open space	Please see the Landscape Design Rationale and the Landscape Masterplan layout which indicates the overall layout and landscaping details for the entire site. The majority of space throughout the development is public open space. There is only one proposed communal open space, located between the two terraces of duplex apartments to the south of the neighbourhood centre. The apartments within the neighbourhood centre, due to their location overlooking the

	dedicated to the apartments and state the measured area on the drawings.	central plaza which is a public open space, are not proposed to have communal open space. In its place all of the balconies associated with these apartments are extra large, combining the quantum required for the private amenity space and communal open space in one location. Given their location and proximity to the proposed public open space, and to the south of the future active open space area, it was deemed the best and most useable solution to future occupants.
P	A CEMP is required and should include details to show that water quality in the Avoca River would be protected and the protection of Avoca Marsh will be undertaken during the course of construction.	A CEMP by Altemar is submitted with this application. This details out the proposed construction details for this site and sets out appropriate mitigation measures to ensure that the Avoca River and Marsh are appropriately protected in the course of construction. This is also reflected in the Environmental Impact Assessment also submitted with this application.

PLANNING POLICY

The following sections of this report describe how the proposed development complies with the relevant National, Regional and Local policies and objectives:

IRELAND 2040 OUR PLAN – NATIONAL PLANNING FRAMEWORK (2040)



The National Planning Framework (NPF) is the Government's plan for shaping the future growth and development of the country and to cater for the extra one million people that is anticipated to be living in Ireland. The Eastern and Midland Region (including Wicklow) will, by 2040, be a Region of around 2.85 million people, at least half a million more than today. The NPF includes National Strategic Outcomes and National Policy Objectives to guide development and policy making at regional and local levels, providing an overall framework for the entire country.

The NPF Strategy includes the following aims:

- Target a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built up areas.
- One of the principal elements of the NPF's overall strategy for spatial planning (NPF Section 2.2) is compact growth.
- Balance the provision of excellent quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.
- Section 3.2 identifies that in locations such as "Wicklow, proximate to the Capital, has resulted in significant development in a region characterised by the dominance of Dublin. ... Managing the challenges of future growth is critical to this regional area. A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns".
- Section 6.6 of the NPF sets out national core principles for housing delivery. These principles include: 'Prioritise the location of new housing provision in existing settlements 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.'

This major new policy emphasis on renewing and developing existing settlements aims to prevent the continual expansion and sprawl of our cities. This aim for compact growth notes that achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority. The NPF projects that 550,000 additional homes will be required by 2040 to meet future demand. These new homes should be located in *places that can support sustainable development* and in *cities and larger towns where large scale housing exists*. To achieve this housing target, *we will need to build inwards and upwards* and apartments will need to become a *more prevalent form of housing*. The NPF also states that that *"to avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas"*.

Key National Policy Objectives which relate to this site are set out below:

- National Policy Objective 3a
Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.

- **National Policy Objective 4**
Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.
- **National Policy Objective 11**
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.
- **National Policy Objective 13**
In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high-quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected.
- **National Policy Objective 27**
Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activity facilities for all ages.
- **National Policy Objective 33**
Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.
- **National Policy Objective 35**
Increase residential density in settlements, through a range of measures including reductions in vacancy, reuse of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

Evaluation of Consistency

The subject site is located within the settlement boundary of Arklow Town. This is consistent with NPO 3a. NPO 33 and 35 emphasise locating residential developments in sustainable and viable locations. The site is well located in this respect as Arklow town centre will be within short walking distance (15-20 mins).

The proposed layout and design of the development ensures a high-quality residential scheme. The choice of high-quality materials and finishes enhances the quality of the development creating an attractive, liveable and high-quality urban area for the future residents of the proposed development.

Overall, the development of these lands is fully in accordance with the recommendations of the NPF.

National Planning Framework First Revision, April 2025

The *National Planning Framework (NPF)* remains the Government's high-level strategy for shaping Ireland's future growth and development to 2040, now updated to reflect significant demographic, environmental, and policy changes since its original 2018 publication. It anticipates that Ireland's

population will grow by approximately one million people, reaching 6.1 million by 2040. The Eastern and Midland Region is projected to grow to nearly 3 million people. The revised NPF continues to set out National Strategic Outcomes (NSOs) and National Policy Objectives (NPOs) that guide development at regional and local levels. The Government completed the review of the NPF in April 2025 and has now adopted a revised NPF. We note the revised NPF contains ambitions to deliver 50,000 units per annum. The Revised NPF puts an increased emphasis on transit orientated development while retaining the importance of compact development generally.

As a strategic development framework, Ireland 2040 sets the long-term context for our country's physical development and associated progress in economic, social and environmental terms and in an island, European and global context.

Key National Policy Objectives which relate to this site within this first revision are set out below:

- *National Policy Objective 2*

The projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined.

- *National Policy Objective 3*

Eastern and Midland Region: approximately 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million

- *National Policy Objective 4*

A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

- *National Policy Objective 7*

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

- *National Policy Objective 8*

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth.

- *National Policy Objective 9*

Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints and ensure compact and sequential patterns of growth.

- *National Policy Objective 10*

Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.

- *National Policy Objective 11*

Planned growth at a settlement level shall be determined at development plan making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject of consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

- *National Policy Objective 12*

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

- *National Policy Objective 13*

Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

- *National Policy Objective 17*

In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and
- A co-ordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.

- *National Policy Objective 22*

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

- *National Policy Objective 37*

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

- *National Policy Objective 38*

Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

- *National Policy Objective 40*

Local planning, housing, health facilities and services, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

- *National Policy Objective 41*

Prioritise the alignment of targeted and planned population and employment growth with investment in:

- A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;
- The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key

enabler for housing development, thereby contributing to the development of sustainable communities;

- The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and
- Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.
- *National Policy Objective 42*

To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040.

- *National Policy Objective 43*

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

- *National Policy Objective 44*

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

- *National Policy Objective 45*

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.

- *National Policy Objective 83*

Identify and strengthen the value of greenbelts and green and blue spaces at regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.

Evaluation of Consistency

The proposed development aligns with the objectives of the NPF First Revision by delivering compact growth within the existing settlement boundary, prioritising sustainable transport connections, and supporting a mix of housing types and community services.

The proposal provides increased residential density, high-quality design, and strong pedestrian and cycle links to Arklow Town, consistent with National Policy Objectives promoting sustainable, integrated, and well-connected urban development.

Overall, the development of these lands is fully in accordance with the recommendations of the NPF.

ESRI POPULATION PROJECTION AND HOUSING DEMAND PUBLICATION, 2024

The NPF has been revised based on the Economic & Social Research Institute (ESRI) publication of "Population Projections, The Flow of New Households and Structural Housing Demand," published on 2nd July 2024.

This report estimates structural (demographic) housing demand at a regional level. The report notes that Ireland has experienced rapid population growth in recent years, both compared to historical experience and relative to other EU countries. Over the 20-year period 2001 to 2021, the population

in Ireland grew by 30.3 per cent compared to population growth of just 4.1 per cent in the EU27 (as a block).

Census 2022 data reveals that the population was 5.184 million, having increased by 422,000 or by 9% since 2016. The report highlights that the recent census figures and data demonstrate previous population scenarios for Ireland have underestimated population growth over the short term.

At a national level, in the baseline population scenario, the population is expected to increase by 922,000 between 2022 and 2040, resulting in a total population of over 6.106 million people by the end of the period. This implies significant overall population growth of 1.0% on an annual average basis.

However, alternative growth scenarios are included reflecting international migration. In the high international migration scenario, the population grows by 1.2%, reaching 6.308 million by 2040. In the low international migration scenario it is estimated at 0.8%, reaching 5.904 million by 2040 on an annual average basis over the period. By 2040, the difference in the population between the high and low international migration scenarios is just over 400,000. The figure below shows these scenarios compared to the NPF projections.

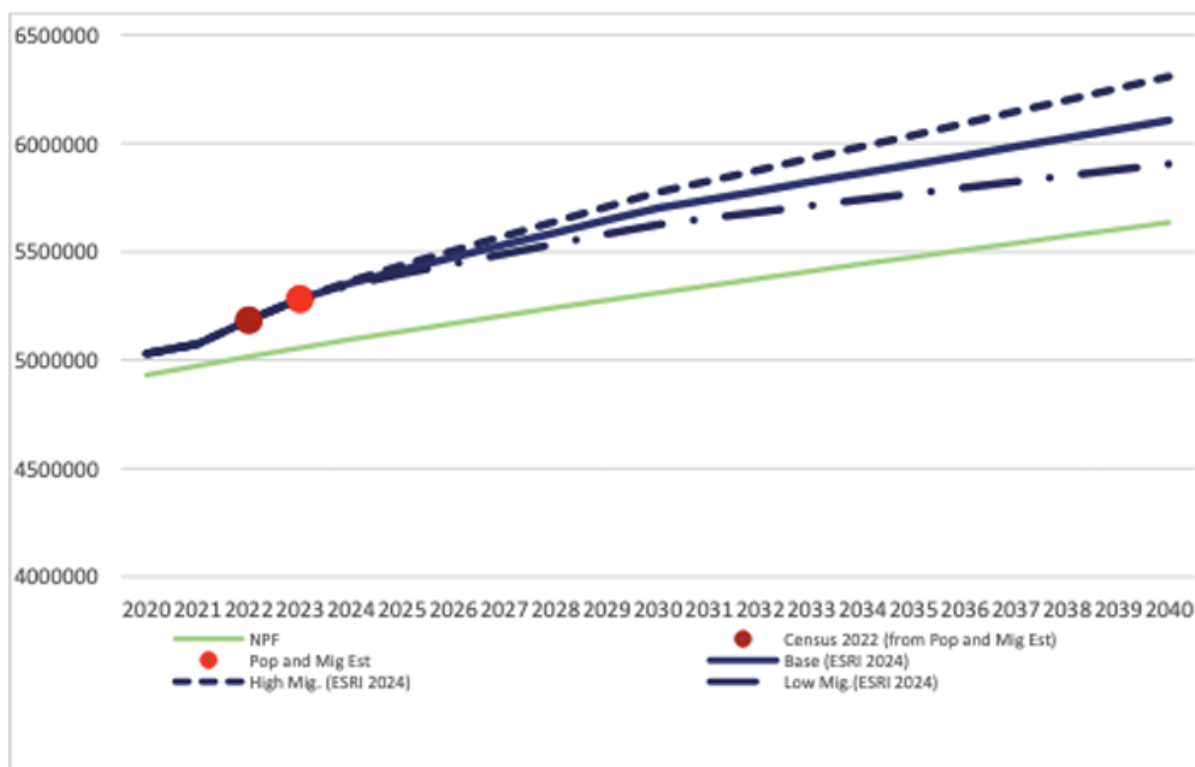


Figure 49 Extract from ESRI Population Projection and Housing Demand 2024

At a regional level, while all regions are expected to experience population growth over the projection horizon, the Eastern and Midlands region is expected to experience relatively higher growth, concentrated in the Dublin and Mid-East regions, while the Northern and Western and Southern regions are expected to experience relatively lower population growth. On an average annual basis, the population in the Mid-East region is expected to increase by 1.1% up to 2040.

	Population ('000s)			Annual Average Growth		
	2022	2030	2040	2022-2030	2030-2040	2022-2040
State	5184.0	5699.9	6106.1	1.3%	0.7%	1.0%
Eastern and Midlands	2557.5	2856.8	3098.2	1.5%	0.8%	1.1%
Dublin	1468.0	1664.2	1814.6	1.6%	0.9%	1.2%
Mid-East	769.3	848.3	922.4	1.4%	0.9%	1.1%

Figure 50 Extract from ESRI Population Projection and Housing Demand 2024

Based on the three demographic scenarios (baseline, high international migration and low international migration), as well as a range of assumptions on headship rates (based on current trends and a fall in household size) and obsolescence rates (0.25 per cent and 0.5 per cent), 12 main structural housing demand scenarios are considered. Taking the average over all 12 scenarios, structural housing demand is projected to be c.44,000 per annum (p.a.) from 2023–2030, decreasing to c.39,700 p.a. over the 2030–2040 period. Appendix 1 of the report sets out local authority level population and housing demand projections as follows:

	Population ('000) Baseline				Annual Growth in %, 2022–2040		
	2022	2027	2032	2040	Baseline	High Migration	Low Migration
State	5184.0	5532.1	5781.0	6106.1	1.0%	1.2%	0.8%
Carlow	62.4	65.2	66.7	68.8	0.6%	0.7%	0.5%
Cavan	82.3	86.5	88.8	91.4	0.7%	0.8%	0.5%
Clare	128.8	136.4	141.6	149.1	0.9%	1.0%	0.7%
Cork	588.1	626.4	653.6	690.3	1.0%	1.1%	0.8%
Donegal	168.2	177.0	181.9	188.1	0.7%	0.8%	0.5%
Dublin	1468.0	1596.3	1696.9	1814.6	1.2%	1.5%	1.0%
Galway	279.6	297.9	311.8	331.5	1.0%	1.2%	0.9%
Kerry	157.5	167.2	173.8	183.3	0.9%	1.1%	0.7%
Kildare	249.4	270.3	288.2	315.1	1.4%	1.5%	1.2%
Kilkenny	104.9	109.4	111.9	115.4	0.6%	0.7%	0.5%
Laois	92.5	98.0	101.6	106.9	0.9%	1.0%	0.7%
Leitrim	35.4	37.6	39.2	41.5	1.0%	1.1%	0.8%
Limerick	211.0	224.2	233.3	244.9	0.9%	1.1%	0.7%
Longford	47.1	49.3	50.4	51.7	0.7%	0.8%	0.5%
Louth	140.6	147.9	152.1	157.5	0.7%	0.9%	0.6%
Mayo	138.9	143.7	144.7	145.2	0.3%	0.5%	0.2%
Meath	222.3	237.5	249.1	266.9	1.1%	1.3%	1.0%
Monaghan	65.7	68.6	69.8	70.8	0.5%	0.7%	0.3%
Offaly	83.7	88.7	92.3	97.6	0.9%	1.1%	0.8%
Roscommon	70.7	74.7	77.4	81.5	0.9%	1.0%	0.7%
Sligo	70.7	75.6	79.3	85.0	1.1%	1.2%	0.9%
Tipperary	169.0	178.1	183.5	190.6	0.7%	0.9%	0.5%
Waterford	128.2	134.5	138.4	144.1	0.7%	0.8%	0.6%
Westmeath	96.9	101.2	103.1	105.0	0.5%	0.7%	0.4%
Wexford	165.0	173.5	178.7	186.3	0.8%	0.9%	0.7%
Wicklow	156.9	166.3	172.9	182.9	0.9%	1.1%	0.8%

Figure 51 Extract from ESRI Population Projection and Housing Demand 2024

	Average Across All Assumptions		Lowest		Highest	
			low migr, current trend headship & 0.25% obs.		high migr, lower hh size headship & 0.5% obs.	
	2023–2030	2030–2040	2023–2030	2030–2040	2023–2030	2030–2040
State	44,047	39,654	35,018	27,805	53,294	52,445
Carlow	432	364	343	252	523	484
Cavan	566	502	436	335	700	681
Clare	973	884	770	608	1,180	1,182
Cork City	1,651	1,501	920	1,064	1,386	1,971
Cork County	3,352	3,046	3,081	2,160	4,641	4,001
Dublin – Dublin City	6,526	5,444	5,054	3,656	8,042	7,403
Dublin – DL-Rathdown	2,643	2,435	2,178	1,826	3,121	3,096
Dublin – Fingal	3,211	2,724	2,558	1,844	3,882	3,683
Donegal	1,187	1,079	915	713	1,464	1,474
Dublin – South Dublin	3,033	2,697	2,452	1,918	3,630	3,545
Galway City	794	653	611	421	982	903
Galway County	1,600	1,511	1,320	1,122	1,885	1,928
Kerry	1,193	1,064	944	724	1,448	1,429
Kildare	2,371	2,428	1,971	1,867	2,779	3,028
Kilkenny	675	642	537	460	816	836
Laois	718	709	577	527	862	906
Leitrim	262	256	204	176	322	343
Limerick	1,769	1,484	1,405	1,011	2,142	1,994
Longford	311	261	243	177	381	351
Louth	1,054	953	832	665	1,280	1,262
Mayo	724	542	517	284	935	821
Meath	1,801	1,877	1,468	1,420	2,141	2,368
Monaghan	434	374	333	245	537	514
Offaly	630	609	506	440	757	790
Roscommon	488	479	381	331	598	637
Sligo	627	576	501	401	755	764
Tipperary	1,187	1,048	914	687	1,466	1,438
Waterford	939	836	750	588	1,131	1,098
Westmeath	643	522	494	340	795	717
Wexford	1,113	1,023	891	730	1,339	1,333
Wicklow	1,141	1,129	912	816	1,374	1,465

Figure 52 Extract from ESRI Population Projection and Housing Demand 2024

As can be seen from the ESRI Data and Population Projections and Housing Demand Publication the forecast, whether baseline, high or low, will continue to see continued population growth and demand for housing. Therefore, this proposed development will deliver 666 will enable Wicklow to meet its targets both in the short and long term.

CLIMATE ACTION PLAN 2025

The Climate Action Plan 2025 (CAP 2025) is the fourth annual update to Ireland's Climate Action Plan 2019 and the third to be prepared under the Climate Action and Low Carbon Development

(Amendment) Act 2021. It builds on the introduction of carbon budgets and sectoral emissions ceilings in Climate Action Plan 2023 and updated in CAP 24 and sets a course for Ireland's targets to halve emissions by 2030 and reach net-zero no later than 2050.

The publication notes for CAP 2025 set out that the new CAP should be read in conjunction with CAP 24 and therefore builds on the provisions of same, which the design team had regard to throughout the pre-application process and prior to CAP25 being published.

Under section 15 of the Climate Action and Low Carbon Development Act 2015, as amended by the 2021 Act, Planning Authorities and the Board are required in so far as practicable to perform their functions in a manner consistent with the most recent CAP.

The Climate Action Plan 2025 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021.

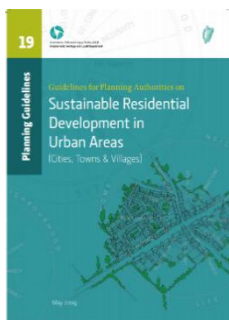
It will put Ireland on a more sustainable path; cut emissions; create a cleaner, greener economy and society; and protect us from the devastating consequences of climate change. It is a huge opportunity to create new jobs and grow businesses in areas like offshore wind; cutting-edge agriculture; and retrofitting, making our homes warmer and safer.

The Plan lists the actions needed to deliver on our climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually to ensure alignment with our legally binding economy-wide carbon budgets and sectoral ceilings.

Evaluation of Consistency

The proposed development is consistent with the Climate Action Plan 2025, supporting the transition to a low-carbon, climate-resilient society. The scheme promotes compact growth, prioritises sustainable transport modes including walking and cycling, and delivers energy-efficient residential units and community infrastructure. These measures align with the CAP's goals to reduce emissions, enhance sustainability, and support a net-zero future, as required under the Climate Action and Low Carbon Development Act, as amended.

GUIDELINES FOR PLANNING AUTHORITIES ON SUSTAINABLE RESIDENTIAL DEVELOPMENT IN URBAN AREAS (2009)



The guidelines set out the key planning principles to be reflected in development plans and local area plans, to guide the preparation and assessment of planning applications for residential development in urban areas.

The Guidelines elaborate a range of high-level aims for successful and sustainable residential development in urban areas.

In accordance with Chapter 6 (Small Towns & Villages) the site can be defined as an "Edge of Centre" which is defined as follows:

"The emphasis will be on achieving successful transition from central areas to areas at the edge of the smaller town or village concerned. Development of such sites tend to be predominantly residential in character and given the transitional nature of such sites, densities to a range of 20-35 dwellings per hectare will be appropriate including a wide variety of housing types from detached dwellings to terraced and apartment style accommodation."

In this instance the proposed development provides for a density for 35 units per ha which is considered in accordance with the Guidelines.

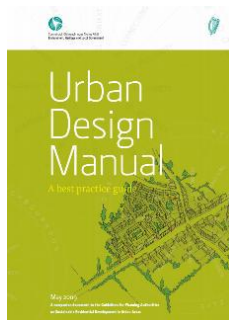
The Guidelines also elaborate a range of high-level aims for successful and sustainable residential development in urban areas. These are assessed against the proposed scheme ensuring that residential developments create sustainable living environments:

Policy	Evaluation of consistency
<i>Prioritise walking, cycling and public transport, and minimise the need to use cars;</i>	<p>The application site will connect directly to the existing public footpath network via the new boardwalk across the Avoca River connecting to the Main Street, and via the permitted route via Avondale Crescent, connecting to the Dublin Road to the east thereby providing safe connection to Arklow Town, the Bus Eireann services and Arklow Train Station.</p> <p>This proposal is accompanied by a Traffic Impact Assessment which confirms there is sufficient car parking for the residential development in line with Wicklow County Council standards.</p> <p>The scheme has been designed to the highest residential standard. All units accord with the quantitative and qualitative standards sets out in the National Apartment Guidelines and the WCC County Development Plan.</p>
<i>Deliver a quality of life which residents and visitors are entitled to expect, in terms of amenity, safety and convenience;</i>	<p>The scheme has been designed to the highest residential standard. All units accord with the quantitative and qualitative standards sets down in the national apartment guidelines and the WCC County Development Plan.</p> <p>The layout and design of the scheme will provide a high-quality living environment where safety and convenience are of the utmost importance. All units will overlook streets/ and attractive open spaces therefore contributing to passive surveillance of this new neighbourhood.</p>
<i>Provide a good range of community and support facilities, where and when they are needed and that are easily accessible;</i>	<p>The development will consist of houses, duplex apartments, apartments, and a local centre as well as large areas of public open space, including a new park, along with the first part of the new distributor road providing connection to the new school campus. The development will also have good accessibility to the town centre where a range of services are provided.</p>
<i>Present an attractive, well-maintained appearance, with a distinct sense of place and a quality public realm that is easily maintained;</i>	<p>There are 4 separate character areas, designed by three separate architects in order to create distinct sense of place for each area. The layout of development has been designed around a number of open spaces which helps to create a unique sense of place.</p>
<i>Are easy to access for all and to find one's way around;</i>	<p>The permitted vehicular access from Kilbride Road, along with the permitted pedestrian route will be further supplemented through the provision of a new boardwalk across the marsh connecting the site to the Main Street on the southside of the Avoca River. This will make the site highly accessible from the north and south side of the river, and to the Arklow Area as a whole.</p>

	<p>The provision of taller buildings at the local centre will result in a visual marker and legibility to the area.</p> <p>There is also a series of linked public open spaces which provide a safe route for pedestrians and cyclists through the site. The layouts are conducive to wayfinding and provides pedestrian and cycle links through the area in a clear and legible manner.</p>
<i>Promote the efficient use of land and of energy, and minimise greenhouse gas emissions;</i>	The proposal seeks to import best practice construction/engineering techniques and use of energy efficient materials to maximise energy capacity and minimise impacts of climate change in accordance with current buildings regulations.
<i>Provide a mix of land uses to minimise transport demand;</i>	The site is zoned for residentially led mixed use development and a variety of residential types are proposed. The site is accessible to the rest of the town and various social infrastructure and employment opportunities in the area.
<i>Promote social integration and provide accommodation for a diverse range of household types and age groups;</i>	A wide range of unit sizes are proposed for the scheme including 1, 2, and 3+ bed houses. This mix of residential unit types provides a good mix for the general area. Part V housing is also provided.
<i>Enhance and protect the green infrastructure and biodiversity; and</i>	<p>The application is accompanied by an Appropriate Assessment Screening Report; Ecological Impact Assessment; and Tree Survey. The proposed planting schemes will include native planting throughout which will enhance the biodiversity. Please refer to the submitted landscape plan for further information.</p>
<i>Enhance and protect the built and natural heritage.</i>	<p>There are no protected structures or national monuments within the application site. Arklow Pyramid is located to the north of the site adjacent to the future phase 2. Public Open Space is proposed with this character area to maintain views to and from this pyramid.</p> <p>It is not in a conservation area.</p> <p>The Appropriate Assessment Screening concluded as follows:</p>

	Details of Project	Appropriate Assessment Screening for the Proposed Construction of a Mixed Use Large-Scale Residential Development (LRD) at Kilbride, Arklow, Co. Wicklow
	Name and Location of NATURA 2000 Sites Within 15km	Buckroney Brittas Dunes and Fen SAC Kilpatrick Sandhills SAC Slaney River Valley SAC Magherabeg Dunes SAC
	Project Description	Construction of large-scale residential development and commercial units.
	Is the Project directly connected with the management of the NATURA 2000 site?	No
	Details of any other projects or plans that together with this project could affect the NATURA 2000 site	None
	The assessment of significant effects	
	Describe how the project is likely to affect the NATURA 2000 site	No significant effect predicted
	Response to consultation	N/A
	Data collected to carry out the assessment	Supporting NPWS data.
	Who carried out the assessment	Altamar Ltd.
	Sources of data	NPWS website, standard data form, conservation objectives data of the site and references outlined in the AA Screening Report.
	Explain why the effects are not considered significant	Having taken into consideration the distance to the nearest Natura 2000 site, the lack of direct hydrological pathway or biodiversity corridor link to conservation sites and the proposed foul and surface water drainage strategy, it is concluded that this development would not give rise to any significant effects on designated sites.
	Level of assessment completed	Stage 1 Screening
	Overall conclusions	On the basis of the content of this report, the competent authority is enabled to conduct a Stage 1 Screening for Appropriate Assessment and consider whether, in view of best scientific knowledge and in view of the conservation objectives of the relevant European sites, the Proposed Development, individually or in combination with other plans or projects is likely to have a significant effect on any European site.

URBAN DESIGN MANUAL – A BEST PRACTICE GUIDE (2009).



The Urban Design Manual is the accompanying document to the Sustainable Residential Development in Urban Areas document which provides policy guidance for the creation of successful neighbourhoods having regard to the 12-point criteria. The proposal complies with the following design criteria:

1. Context –How does the development respond to its surroundings?	
<i>The development seems to have evolved naturally as part of its surroundings.</i>	The adjoining residential area is currently dominated by low density two storey residential developments. This proposal is for predominantly two and rises to 5 storeys around the local centre. It is at a higher density than the surrounding area but is considered to make best and appropriate use of this land, while providing an appropriate relationship with the existing surroundings. A key objective for the proposed scheme was to help densify the area, provide a greater mix of unit types, and provide active streetscapes and a good sense of place.
<i>Appropriate increases in density respect the form of buildings and landscape around the site's edges and the amenity enjoyed by neighbouring users.</i>	The site provides a higher density compared to it's surrounding, reflecting national policy and the need to enable compact growth. The sites has a ample open space throughout the development all of which are overlooked by the properties proposed.

	<p>There are appropriate buffers provided to existing features including the marshlands, existing residential and manmade ditches.</p> <p>The proposed layout respects the existing buildings surrounding the site and will not deter the amenities enjoyed by the neighbouring users.</p>
<i>Form, architecture and landscaping have been informed by the development's place and time.</i>	The design and density of the development reflects the context of the site and provides a modern and high-quality scheme. The height, scale and massing are considered appropriate given its context within the site and the surrounding developments in the wider area.
<i>The development positively contributes to the character and identity of the neighbourhood.</i>	The proposal creates an identity and a sense of place for the new neighbourhood. The proposals attractive layout and design is integrated into its natural setting.
<i>Appropriate responses are made to the nature of specific boundary conditions.</i>	The development has sought to incorporate the natural features and mature trees as much as possible.

2. Connections – How well connected is the new development

<i>There are attractive routes in and out for pedestrians and cyclists.</i>	<p>The permitted vehicular access from Kilbride Road, along with the permitted pedestrian route will be further supplemented through the provision of a new boardwalk across the marsh connecting the site to the Main Street on the southside of the Avoca River. This will make the site highly accessible from the north and south side of the river, and to the Arklow Area as a whole.</p> <p>This development will enable a modal shift from reliance on the car for the AAP3 site to more pedestrians and cyclists who could travel through the application site to get to school.</p>
<i>The development is located in or close to a mixed-use centre.</i>	<p>The site is within a reasonable walking distance (c.15 Mins) to the Bridgewater Shopping Centre and within a c.10-20minute walk to other services within the town centre north and south of the river including Bus Eireann services and the Arklow train station (which will be further improved with the access links proposed).</p> <p>The development will also include its own local centre providing a creche, medical and retail services within the new community proposed.</p>
<i>The development's layout makes it easy for a bus to serve the scheme.</i>	The proposed new distributor road, and the vehicular access route down to the site is designed to be compliant with DMURS. Given the width of the road it could accommodate a bus service should one be required.
<i>The layout links to existing movement routes and the places people will want to get to.</i>	Pedestrian permeability through the site is promoted in the residential layout enabling future residents to access the development from multiple points to access the existing network of pedestrian, cycle and public transport facilities.

<i>Appropriate density, dependent on location, helps support efficient public transport.</i>	The density accords with national guidelines at c.35 uph. The subject site is within a c.15 minute walk to existing bus routes and c.30 mins to train station which enables this development to support the efficient use of public transport.
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3. Inclusivity – How easily can people use and access the development?

<i>New homes meet the aspirations of a range of people and households.</i>	The 1, 2, and 3+ bed houses will meet the needs of a wide range of future occupants from first time buyers, families with children, to empty nesters and people seeking to downsize. The range of housing typologies and quality of internal spaces and private open space and communal spaces will fulfil the requirements of all future residents.
<i>Design and layout enable easy access by all.</i>	The proposal has been designed for ease of access throughout the site in accordance with Part M of the building regulations. In addition to this 5% of all of the units meet Universal Design Requirements in line with the Development Plan.
<i>There is a range of public, communal and/or private amenity spaces and facilities for children of different ages, parents and the elderly.</i>	<p>The scheme will provide a variety of open spaces, both communal and private amenity spaces for a range of different ages including children, adults and the elderly.</p> <p>The landscape strategy aims to integrate the new built development with the existing landscape and create a network of attractive useable open spaces while contributing to the local biodiversity. The public open spaces provide for meeting, walking, formal and informal play.</p>
<i>Areas defined as public open space that have either been taken in charge or privately managed will be clearly defined, accessible and open to all.</i>	The public open space will be openly accessible to all and clearly defined as such. It is intended that the Public Open Space will be Taken in Charge by the council.
<i>New buildings present a positive aspect to passers-by, avoiding unnecessary physical and visual barriers.</i>	<p>The layout is designed to maximise visual and physical fluidity throughout the scheme and will not hinder movement.</p> <p>All dwellings (where possible) are oriented towards the public spaces contributing to the passive surveillance and overall security of the scheme.</p>

4. Variety – How does the development promote a good mix of activities?

<i>Activities generated by the development contribute to the quality of life in its locality.</i>	<p>The proposal will significantly improve the housing mix of the area and will provide a new local centre with community, commercial and creche uses. While the proposed residential will increase population creating additional demand for educational, sports and retail services this first phase of development, along with the permitted school, will provide the population to support this. Phase 2 will deliver additional sports facilities. It is also noted that there are existing services in the area close to the development.</p> <p>The proposal also includes large areas of public open space throughout the area which will not only serve the subject application development but also the wider masterplan area, front loading the delivery of public open space with this</p>
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	development. This will be of significant benefit to the wider area open up the marsh, and providing attractive views across it as part of this development.
<i>Uses that attract the most people are in the most accessible places.</i>	A variety of open spaces are provided throughout the scheme and will be easily accessible to residents and the public. It is also noted to the north is the permitted school campus. It is envisaged that pupils and staff of this school will travel through the application by foot or cycle to access the school providing modal choice in accessing this site.
<i>Neighbouring uses and activities are compatible with each other.</i>	The area is characterised by residential uses; as such the proposed use is compatible with the surrounding area.
<i>Housing types and tenure add to the choice available in the area.</i>	A mix of 1, 2, and 3+ bed houses and duplex apartments/ apartments will further improve the range of unit types in the area available to various household types. Please refer to the accommodation schedule for more information.
<i>Opportunities have been taken to provide shops, facilities and services that complement those already available in the neighbourhood.</i>	The site is within a reasonable walking distance (c.15 Mins) to the Bridgewater Shopping Centre and within a c.10-20 minute walk to existing services and amenities within the town centre both sides of the river

5. Efficiency - How does the development make appropriate use of resources, including land?

<i>The proposal looks at the potential of higher density, taking into account appropriate accessibility by public transport and the objectives of good design.</i>	The development density of c.35.2 units/ha net is appropriate for the site and is a sustainable increase on the low-density estates in the existing residential areas. The development will include a pedestrian and cycle path to connect to the existing public footpaths that lead into the town centre.
<i>Landscaped areas are designed to provide amenity and biodiversity, protect buildings and spaces from the elements and incorporate sustainable urban drainage systems.</i>	The proposal provides for high quality, landscaped public open space as part of the residential element of the development. The scheme incorporates SuDS, promoting biodiversity and providing residential amenity. Where possible existing trees and hedgerows have been retained around the site. In addition to this the public realm will be planted with a diverse mix of plants and tree species to create tree lined avenues. We refer to the landscape drawings for more information.
<i>Buildings, gardens and public spaces are laid out to exploit the best solar orientation.</i>	100% of all units are dual aspect and are orientated to get the most amount of daylight into the units. All units and open spaces will enjoy sufficient sunlight and daylight provision.
<i>The scheme brings a redundant building or derelict site back into productive use.</i>	This is an underutilised greenfield site which is directly serviced by roads and services.
<i>Appropriate recycling facilities are provided.</i>	Each house will undertake its own recycling with collection by municipal services. The apartments and duplex apartments will have communal bin facilities with recycling.

6. Distinctiveness - How do the proposals create a sense of place?

<i>The place has recognisable features so that people can describe where they live and form</i>	The layout of the scheme allows for the creation of distinctive streets and open spaces which will instil a sense of place for future residents. 3 separate architects have designed the four
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an emotional attachment to the place.	character areas to ensure that each area is distinct and recognisable.
The scheme is a positive addition to the identity of the locality.	The proposal will provide an attractive new residential development at an appropriate scale and quantum for Arklow. It will be a positive addition to the residential character of the Kilbride area.
The layout makes the most of the opportunities presented by existing buildings, landform and ecological features to create a memorable layout.	The proposed layout seeks to incorporate the existing planting along the site boundaries, while providing direct views across the Marshland. All open spaces are overlooked. The development is also stepped off ditch along the eastern boundary with additional native hedgerow planting in this location to enhance this area.
The proposal successfully exploits views into and out of the site.	As can be seen from the contiguous elevations and the proposed plans the views have been carefully considered in order to enhance the area and it is sensitive to the character of the surrounding area.
There is a discernible focal point to the scheme, or the proposals reinforce the role of an existing centre.	The main public open space provides for focal point for the scheme and which is overlooked by the majority of the residential units.

7. Layout - How does the proposal create people friendly streets and spaces?

Layout aligns routes with desire lines to create a permeable interconnected series of routes that are easy and logical to navigate around.	Pedestrian permeability is a key design outcome for the scheme. All cycle and pedestrian paths have been designed to follow anticipated desire lines.
The layout focuses activity on the streets by creating frontages with front doors directly serving the street.	The proposed streetscape is well defined and seeks to reduce car speeds and provide a better balance of modal use with pedestrians and cyclists.
The streets are designed as places instead of roads for cars, helping to create a hierarchy of space with less busy routes having surfaces shared by pedestrians, cyclists and drivers.	
Traffic speeds are controlled by design and layout rather than by speed humps.	
Block layout places some public spaces in front of building lines as squares or greens, and some semi-private space to the back as communal court.	The open space strategy for the scheme creates multiple open space areas of varying uses and sizes.

8. Public Realm - How safe, secure and enjoyable are the public areas?

All public open space is overlooked by surrounding homes so that this amenity is owned by the residents and safe to use.	All spaces are overlooked and surveyed by the residential units offering natural passive surveillance. All dwellings are within a short walking distance of the public open space.
The public realm is considered as a usable integrated element in the design of the development.	Public realm is properly integrated into the design of the development and forms an attractive feature of the development.
Children's play areas are sited where they will be overlooked, safe and contribute to the amenities of the neighbourhood.	A play area is facilitated within the scheme overlooked by houses.
There is a clear definition between public, semiprivate, and private space.	This is achieved. Please refer to the drawings and documentation submitted by NMP Landscape Architects.
Roads and parking areas are considered as an integral landscaped element in the design of the public realm.	The scheme provides for 1,185 no. of car parking spaces throughout the scheme. Car parking is provided on street, within the curtilage of each home and within the local centre. The integration of landscape elements interspersed between the car parking has been a key element for the scheme's high-quality design approach.

9. Adaptability - How will the buildings cope with change?

<i>Designs exploit good practice lessons, such as the knowledge that certain house types are proven to be ideal for adaptation.</i>	There is a variety of house types including semi-detached, and terraced houses along with duplex apartments/ apartments. All of the houses have the ability to be altered/ extended in the future. The development also includes for Universally Designed adaptable homes within the development.
<i>The homes are energy-efficient and equipped for challenges anticipates from a changing climate.</i>	The new houses will be constructed in accordance with the energy efficiency standards in place. The design practices and proposed materials will militate against the effects of climate change.
<i>Homes can be extended without ruining the character of the types, layout and outdoor space.</i>	The houses can all be extended without having a detrimental impact on the surrounding residential amenities and character.
<i>The structure of the home and its loose fit design allows for adaptation and subdivision, such as the creation of an annex or small office.</i>	All of the houses can accommodate conversions and extensions as appropriate. The internal space is also flexible and allows for the removal/ addition of walls etc to create different spaces according to needs.
<i>Space in the roof or garage can be easily converted into living accommodation.</i>	

10. Privacy and Amenity - How does the scheme provide a decent standard of amenity?

<i>Each home has access to an area of useable private outdoor space.</i>	Yes, each unit has its own private open space in accordance with the minimum residential standard.
<i>The design maximises the number of homes enjoying dual aspect.</i>	All of the units are at least dual, if not multiple aspect. This accords with national policy.

<i>Homes are designed to prevent sound transmission by appropriate acoustic insulation or layout.</i>	All units will be designed to prevent sound transmission in accordance with current building standards.
<i>Windows are sited to avoid views into the home from other houses or the street and adequate privacy is affordable to ground floor units.</i>	<p>All units have been oriented to minimise overlooking. Adequate separation distance between opposing windows is achieved and overlooking is not considered an issue.</p> <p>Where houses are less than 22m apart the houses are angled away from each other and the windows avoid any potential for direct overlooking between the units.</p> <p>Landscaping strips and boundary treatments at ground floor level ensure that ground floor areas will have an adequate level of privacy.</p>
<i>The homes are designed to provide adequate storage including space within the home for the sorting and storage of recyclables</i>	All units are provided with storage space in line with relevant DoE requirements.

11. Parking – How will the parking be secure and attractive?

Appropriate car parking is on-street or within easy reach of the home's front door.	On-street is provided throughout the development. All of this parking is overlooked and within easy reach of each residential unit.
Parked cars are overlooked by houses, pedestrians and traffic, or stored securely, with a choice of parking appropriate to the situation.	<p>All parking is easily accessed from each home.</p> <p>The quantum of parking provided is in line with the car parking ratios required in Wicklow County Council's Development Plan.</p>
Parking is provided communally to maximise efficiency and accommodate visitors without the need to provide additional dedicated spaces.	Please see the Traffic Impact Assessment prepared by Systra for further details.
Materials used for parking areas are of similar quality to the rest of the development.	Parking areas will comprise quality surface treatments that promote sustainable drainage and are in keeping with palette and quality of building materials used elsewhere in the development.
Adequate secure facilities are provided for bicycle storage.	Bicycle parking will be accommodated within the curtilage of each of the housing units or within bicycle parking shelters for duplex / apartment units.

12. Detailed Design – How well thought through is the building and landscape design?

The materials and external design make a positive contribution to the locality.	The overall choice of materials and character of the elevations are attractive, high quality, contemporary design. This development is of sufficient size that it can, and has, created its own architectural modern language and will deliver 4 distinct character areas which will be complementary to the surrounding area. Please see the Design Statement by BKD Architects.
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The landscape design facilitates the use of the public spaces from the outset.	The public realm has been designed to ensure spaces are easily accessible, safe and secure and aesthetically complement the built form. The open spaces will be provided in tandem with the residential and neighbourhood development.
Design of the buildings and public space will facilitate easy and regular maintenance.	The layout of the residential units and the landscaped areas will be accessible for easy and regular maintenance.
Open car parking areas are considered as an integral element within the public realm design and are treated accordingly.	Parking is at surface level and has been carefully located to ensure it does not dominate the environment by using appropriate landscaping. The careful landscaping around the car parking provides an attractive secure location.
Care has been taken over the siting of flues, vents and bin stores	Bin stores are located discretely around the site.

We consider the proposal in accordance with the above departmental guidelines. Based on the above, we predict the development will create a high-quality residential environment in Arklow Town.

SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENT, GUIDELINES FOR PLANNING AUTHORITIES, 2024

The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements. These Guidelines replace the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities issued as Ministerial guidelines under Section 28 of the Act in 2009, which in turn replaced the Residential Density Guidelines issued in 1999. They build on and update previous guidance to take account of current Government policy and economic, social and environmental considerations. There is a renewed focus in the Guidelines on the renewal of existing settlements and on the interaction between residential density, housing standards and quality urban design and placemaking to support sustainable and compact growth.

It is intended that the Sustainable Residential Development and Compact Settlement Guidelines will be accompanied by a Design Manual that will provide best practice guidance on how the policies and objectives of the guidelines can be applied. At the time of submitting this LRD planning application, the accompanying Design Manual has not been published, therefore the proposed development is assessed against the 2009 Urban Design Manual as set out within this Statement of Consistency.

Section 1.3.2 of the Guidelines relating to Compact Growth state that *“priorities for compact growth include an emphasis on the renewal of existing settlements, rather than continued sprawl. This priority recognises the impacts that our dispersed settlement pattern (including the dispersal of residential, commercial and employment uses within settlements) is having on people, the economy and the environment. In particular, there is a recognition that dispersed settlement patterns are contributing to the social, economic and physical decline of the central parts of many of our cities and towns, as population and activities move out. There is a recognition that dispersed settlement patterns create a demand for travel and embed a reliance on carbon intensive private car travel and long commutes that affect quality of life for many citizens”*.

Chapter 3 of the guidelines sets out policy and guidance in relation to growth priorities for settlements at each tier in the national settlement hierarchy and in relation to residential density. Under this categorisation, as set out in Table 3.5 – ‘Areas and Density Ranges – Key Towns and Large Towns

(5,000+ population), this site would be considered a 'Key Town / Large Town – Suburban/Urban Extension':

Suburban areas are the low density car-orientated residential areas constructed at the edge of the town, while urban extension refers to greenfield lands at the edge of the existing built-up footprint area that are zoned for residential or mixed-use (including residential) development. It is a policy and objective of these Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and urban extension locations of Key Towns and Large Towns, and that densities of up to 80 dph (net) shall be open for consideration at 'accessible' suburban / urban extension locations (as defined in Table 3.8).

Policy and Objective	Response
3.1 It is a policy and objective of these Guidelines that the recommended residential density ranges set out in Section 3.3 are applied within statutory development plans and in the consideration of individual planning applications, and that these density ranges are refined further at a local level using the criteria set out in Section 3.4 where appropriate.	The overall density of 35dph accords with the "30pdh to 50dph (net)" density range for this urban extension to Arklow.
4.1 It is a policy and objective of these Guidelines that planning authorities implement the principles, approaches and standards set out in the Design Manual for Urban Roads and Streets, 2013 (including updates) in carrying out their functions under the Planning and Development Act 2000 (as amended) and as part of an integrated approach to quality urban design and placemaking.	DOBA and Systra documentation confirm that the proposed development is in accordance with DMURS.
4.2 It is a policy and objective of these Guidelines that the key indicators of quality urban design and placemaking set out in Section 4.4 are applied within statutory development plans and in the consideration of individual planning applications.	Please see the assessment below which confirms the development is in accordance with Section 4.4
5.1 It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum requirement should be justified taking into account existing public open space provision in	The proposed scheme provides some 3.78 ha of Public Open Space which equates to 15.5% of the net site area.

the area and broader nature conservation and environmental considerations.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a planned basis, having regard to the overall approach to public park provision within the area.

In the case of sites that contain significant heritage, landscape or recreational features and sites that have specific nature conservation requirements, a higher proportion of public open space may need to be retained. The 10-15% range shall not therefore apply to new development in such areas.

In some circumstances a planning authority might decide to set aside (in part or whole) the public open space requirement arising under the development plan. This can occur in cases where the planning authority considers it unfeasible, due to site constraints or other factors, to locate all of the open space on site. In other cases, the planning authority might consider that the needs of the population would be better served by the provision of a new park in the area or the upgrade or enhancement of an existing public open space or amenity. It is recommended that a provision to this effect is included within the development plan to allow for flexibility. In such circumstances, the planning authority may seek a financial contribution within the terms of Section 48 of the Planning and Development Act 2000 (as amended) in lieu of provision within an application site

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) in relation to the design of housing:

Specific Planning Policy Requirement	Evaluation of Consistency
SPPR 1 Separation Distances It is a specific planning policy requirement of these Guidelines that statutory development plans shall not include an objective in respect of minimum separation distances that exceed 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units or apartment units above ground floor level. When considering a planning application for residential development, a	Noted. The proposed development achieves the minimum separation distance set out to the left. The amenity of existing residents is respected by providing separation distances which are proportionate to the heights proposed. The transition in building form will mitigate any potential for overshadowing or daylighting impacts by the development onto existing residential units.

<p>separation distance of at least 16 metres between opposing windows serving habitable rooms at the rear or side of houses, duplex units and apartment units, above ground floor level shall be maintained. Separation distances below 16 metres may be considered acceptable in circumstances where there are no opposing windows serving habitable rooms and where suitable privacy measures have been designed into the scheme to prevent undue overlooking of habitable rooms and private amenity spaces.</p> <p>There shall be no specified minimum separation distance at ground level or to the front of houses, duplex units and apartment units in statutory development plans and planning applications shall be determined on a case-by-case basis to prevent undue loss of privacy.</p>	<p>Please refer to the Architectural Design Statement prepared by BKD Architects for further details.</p>
<p>SPPR 2 - Minimum Private Open Space Standards for Houses</p> <p>It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:</p> <ul style="list-style-type: none"> • 1 bed house 20 sq.m • 2 bed house 30 sq.m • 3 bed house 40 sq.m • 4 bed + house 50 sq.m <p>A further reduction below the minimum standard may be considered acceptable where an equivalent amount of high quality semi-private open space is provided in lieu of the private open space, subject to at least 50 percent of the area being provided as private open space (see Table 5.1).</p>	<p>A Housing Quality Audit prepared by BKD Architect is enclosed with the application. This sets out the housing and apartment mix throughout the proposed development, the size of all the units, the quantum of private open space, storage space, living/dining/kitchen areas, bedroom areas, and dual aspect. All of the private open spaces for houses meet or exceed the targets set in SPPR2.</p>
<p>Policy and Objective 5.1 - Public Open Spaces</p> <p>It is a policy and objective of these Guidelines that statutory development plans include an objective(s) relating to the provision of public open space in new residential developments (and in mixed-use developments that include a residential element). The requirement in the development plan shall be for public open space provision of not less than a minimum of 10% of net site area and not more than a minimum of 15% of net site area save in exceptional circumstances. Different minimum requirements (within the 10-15% range) may be set for different areas. The minimum</p>	<p>The proposed development provides for approximately 17.7% of usable public open space within the net developable site area.</p> <p>Full details of the sites public open space and amenity strategies are detailed in the enclosed Architectural Design Statement and Landscape Masterplan and Design Report.</p>

<p>requirement should be justified taking into account existing public open space provision in the area and broader nature conservation and environmental considerations.</p>	
<p>SPPR 3-Car Parking</p> <p>It is a specific planning policy requirement of these Guidelines that:</p> <p>In intermediate and peripheral locations, defined in Chapter 3 (Table 3.8) the maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 2 no. spaces per dwelling.</p> <p>Applicants should be required to provide a rationale and justification for the number of car parking spaces proposed and to satisfy the planning authority that the parking levels are necessary and appropriate, particularly when they are close to the maximum provision. The maximum car parking standards do not include bays assigned for use by a car club, designated short stay on- street Electric Vehicle (EV) charging stations or accessible parking spaces. The maximum car parking standards do include provision for visitor parking.</p>	<p>The proposed car parking is in line with the accessible nature of the site. In line with this policy, and as set out in the Transport Impact Assessment, parking to standard has been provided. This will enable a more sustainable mode of transport and encourage a modal shift to more active methods of movement.</p>
<p>SPPR 4-Cycle Parking and Storage</p> <p>It is a specific planning policy requirement of these Guidelines that all new housing schemes (including mixed-use schemes that include housing) include safe and secure cycle storage facilities to meet the needs of residents and visitors. The following requirements for cycle parking and storage are recommended:</p> <ul style="list-style-type: none"> i. Quantity - in the case of residential units that do not have ground level open space or have smaller terraces, a general minimum standard of 1 cycle storage space per bedroom should be applied. Visitor cycle parking should also be provided. Any deviation from these standards shall be at the discretion of the planning authority and shall be justified with respect to factors such as location, quality of facilities proposed, flexibility for future enhancement/enlargement, etc. It will be important to make provision for a mix of bicycle parking types including larger/heavier cargo and electric bikes and for individual lockers. 	<p>In line with this policy, cycle parking is provided to standard.</p> <p>The quality and design of the cycle storage facilities are in line with the NTA Cycle Design Guidance.</p>

<p>i. Design-cycle storage facilities should be provided in a dedicated facility of permanent construction, within the building footprint or, where not feasible, within an adjacent or adjoining purpose-built structure of permanent construction. Cycle parking areas shall be designed so that cyclists feel safe. It is best practice that either secure cycle cage/compound or preferably locker facilities are provided.</p>	
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QUALITY HOUSING FOR SUSTAINABLE COMMUNITIES (2007)



The Department's policy statement Delivering Homes, Sustaining Communities, Guidance provides the overarching policy framework for an integrated approach to housing and planning. Sustainable neighbourhoods are areas where an efficient use of land, high quality design, and effective integration in the provision of physical and social infrastructure combine to create places people want to live in. The policy statement is accompanied by Best Practice Guidelines that promotes quality sustainable residential development in urban areas having regard to the following:

- promote high standards in the design and construction and in the provision of residential amenity and services in new housing schemes;
- encourage best use of building land and optimal of services and infrastructure in the provision of new housing;
- point the way to cost effective options for housing design that go beyond minimum codes and standards;
- promote higher standards of environmental performance and durability in housing construction;
- seek to ensure that residents of new housing schemes enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and
- provide homes and communities that may be easily managed and maintained.

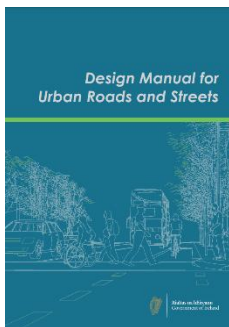
The following criteria indicate the 7 no. essential requirements new residential developments should have regard to when carrying out development:

	Evaluation of Consistency
<p>Socially & Environmentally Appropriate "The type of accommodation, support services and amenities provided should be appropriate to the needs of the people to be accommodated. The mix of dwelling type, size and tenure should support sound social, environmental and economic sustainability policy objectives for the area and promote the development of appropriately integrated play and recreation spaces."</p>	<p>The scheme will provide an appropriate mix of 1, 2, and 3+ bedroom houses. The proposal seeks to integrate usable open spaces distributed throughout the development, all of which are interconnected. All open spaces will be overlooked by adjoining housing.</p> <p>A part V proposal is submitted with this scheme to address the requirements for social and affordable housing.</p>

<p>Architecturally Appropriate</p> <p>“The scheme should provide a pleasant living environment, which is aesthetically pleasing and human in scale. The scheme design solution should understand and respond appropriately to its context so that the development will enhance the neighbourhood and respect its cultural heritage.”</p>	<p>The design and layout of the scheme creates a liveable and visually pleasing residential environment.</p> <p>The design is appropriate and mindful of the urban edge context, the site constraints, and architectural character of the adjoining residential areas.</p>
<p>Accessible & Adaptable</p> <p>“There should be ease of access and circulation for all residents, including people with impaired mobility, enabling them to move as freely as possible within and through the development, to gain access to buildings and to use the services and amenities provided. Dwellings should be capable of adaptation to meet changing needs of residents during the course of their lifetime.”</p>	<p>The layout of the proposed development allows for ease of access for all residents, with vehicle entrances located at the northeast of the application site.</p> <p>All the houses will be adaptable and can be changed to meet the needs of the residents into the future.</p>
<p>Safe, Secure & Healthy</p> <p>“The scheme should be a safe and healthy place in which to live. It should be possible for pedestrians and cyclists to move within and through the area with reasonable ease and in safety. Provision for vehicular circulation, including access for service vehicles, should not compromise these objectives.”</p>	<p>The scheme provides good segregation of vehicle and pedestrians/cyclists.</p> <p>A very safe walking and cycling environment will be provided for residents and those travelling through the scheme. In particular it will provide a new, very safe route from Arklow Town to the new Educational Campus to the north of the site, which will be predominantly car free or will have clearly segregated routes, making it safer for all pupils attending school by alternative means other than the car.</p> <p>The interconnectivity of the scheme will ensure access for all while creating a walkable environment for inhabitants of the scheme. The continuity of path networks will assist natural way-finding in the scheme. Public open space shall be overlooked as far as practicable to achieve maximum passive surveillance.</p>
<p>Affordable</p> <p>“The scheme should be capable of being built, managed and maintained at reasonable cost, having regard to the nature of the development.”</p>	<p>The scheme will have high quality materials and landscaping throughout, ensuring that it has longevity in terms of appearance and ease of maintenance.</p>
<p>Durable</p> <p>“The best available construction techniques should be used, and key elements of construction should have a service life in the order of sixty years without the need for abnormal repair or replacement works.</p>	<p>The scheme endeavours to use the best available materials and construction techniques in order to minimise the level of refurbishment over the lifetime of the scheme.</p>
<p>Resource Efficient</p>	<p>The scheme is considered to accord with the sustainable development principles.</p>

“Efficient use should be made of land, infrastructure and energy. The location should be convenient to transport, services and amenities. Design and orientation of dwellings should take account of site topography so as to control negative wind effects and minimise the benefits of sunlight, daylight and solar gain; optimum use should be made of renewable sources of energy, the use of scarce natural resources in the construction, maintenance and management of the dwellings should be minimised.”

DESIGN MANUAL FOR URBAN ROADS AND STREETS (2019)



The Design Manual for Urban Roads and Streets (DMURS) was first published in 2013 with an updated version released in May 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas.

Evaluation of Consistency

The adopted design approach successfully achieves the appropriate balance between the functional requirements of different network users whilst enhancing the sense of place. These are addressed in detail below:

Design Principal 1	Connected Networks
“To support the creation of integrated street networks which promote higher levels of permeability and legibility for all users, and in particular more sustainable forms of transport.”	<p>The proposed layout has been designed to ensure a safe, attractive and legible layout. It includes a new road to the north, providing connections to the new school campus and the Kilbride Road. There is also a new boardwalk across the river. This is in addition to the permitted new pedestrian route past the Marsh Sports centre</p> <p>The road network has been designed to reduce car speeds with short stretches of road. This will ensure that walking and cycling through the scheme is safe and attractive.</p> <p>The road network has also been designed to connect with future development on the zoned lands to the north, west and northwest of the site. Please refer to the masterplan drawing submitted with this application.</p> <p>The open space provides an attractive recreational area while also providing an attractive pathway for pedestrians to navigate the scheme.</p>
Design Principle 2	Multi-Functional Streets

<i>"The promotion of multi-functional, place-based streets that balance the needs of all users within a self-regulating environment."</i>	<p>The public realm is self-regulated as all dwelling units overlook and front streets/public realm providing natural passive surveillance of these areas.</p> <p>The proposed street network ensures that adequate space is given to pedestrians and clear pedestrians routes through the scheme are provided.</p> <p>The potential use of homezones, tree planting alongside the streets, and the fronting of dwellings onto the streets will help to create a strong sense of place within this new development.</p>
Design Principle 3	Pedestrian Priority
<i>"The quality of the street is measured by the quality of the pedestrian environment."</i>	<p>Pedestrian priority is of the utmost importance. Footpaths are provided throughout the scheme to ensure adequate pedestrian space is provided. This includes both the full length of the road to the new educational campus as well as into Arklow Town Centre. In addition, the scheme has been designed to reduce car speeds and create a strong sense of place and security which will help to ensure walking through the scheme is attractive and safe for all pedestrians.</p> <p>The incorporation of tree planting along the streets and in the open spaces will vastly enhance the character of the development thus creating a legible neighbourhood with improved residential amenity.</p>
Design Principle 4	Multi-Disciplinary Approach
<i>"Greater communication and cooperation between design professionals through the promotion of a plan-led, multidisciplinary approach to design."</i>	<p>The proposed design results from a multi-disciplinary plan-led approach through the co-operation of architects, engineers, landscape architects and Wicklow County Council Planners. The design team have worked together to ensure that the common conflict of landscaping and services is avoided. This collaboration will continue post planning should permission be granted.</p>

REBUILDING IRELAND: ACTION PLAN FOR HOUSING AND HOMELESSNESS

The action plan for housing and homelessness recognises that a significant increase in new homes is required. The action plan outlines a 5 pillar approach as follows:

- Pillar 1 - Address Homelessness
- Pillar 2 - Accelerate Social Housing
- Pillar 3 - Build More Homes
- Pillar 4 - Improve the Rental Sector
- Pillar 5 - Utilise Existing Housing

The plan outlines that accelerating delivery of housing for the private, social and rented sectors which is affordable, in the right locations and meets peoples different needs is a key priority for the Government.

Evaluation of Consistency

The proposed development supports Pillar 3 of the plan specifically by way of the delivery of 666 no. new residential units at a key location adjacent to services and amenities. The proposal also supports Pillar 2 and will provide for 66 no. Part V units. We submit that the proposal is consistent with the Action Plan for Housing and Homelessness.

URBAN DEVELOPMENT & BUILDING HEIGHTS: GUIDELINES FOR PLANNING AUTHORITIES, 2018

The Building Height Guidelines 2018 set out national planning policy guidelines on building heights in urban areas in response to specific policy objectives set out in the NPF. There is now a presumption in favour of increased building height in appropriate urban locations with good public transport services.

SPPR 1 of the Guidelines state the following:

In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.

The imposition of height or numerical restriction at the subject site would therefore be contrary to Specific Planning Policy Requirement 1 which notes that blanket numerical limitations on building height shall not be provided for through statutory plans.

Section 3.1 of the Guidelines go on to state:

In relation to the assessment of individual planning applications and appeals, it is Government policy that building heights must be generally increased in appropriate urban locations. There is therefore a presumption in favour of buildings of increased height in our town/city cores and in other urban locations with good public transport accessibility. Planning authorities must apply the following broad principles in considering development proposals for buildings taller than prevailing building heights in urban areas in pursuit of these guidelines:

Section	Evaluation of consistency
<ul style="list-style-type: none"> Does the proposal positively assist in securing National Planning Framework objectives of focusing development in key urban centres and in particular, fulfilling targets related to brownfield, infill development and in particular, effectively supporting the National Strategic Objective to deliver compact growth in our urban centres? 	<p>The proposed development seeks to deliver a significant residential development at a site that is zoned for residential led mixed use development. It is located close to Arklow Town Centre with its associated amenities. It will also deliver additional routes to and from the site creating a permeable site that enables people to walk or cycle to the surrounding facilities existing in the area.</p>
<ul style="list-style-type: none"> Is the proposal in line with the requirements of the development plan in force and which plan has taken clear account of the requirements set out in Chapter 2 of these guidelines? 	<p>In addition to this it is proposed to deliver a new neighbourhood centre which includes 3 retail units along with 3 community/ health units and a two storey creche. This will be located within the heart of the site. This will compliment the permitted school campus located in the northern corner of the AAP3 zoned land.</p>

<ul style="list-style-type: none"> Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that the implementation of the pre-existing policies and objectives of the relevant plan or planning scheme does not align with and support the objectives and policies of the National Planning Framework? 	<p>This development is considered to be in line with the Development Plan and Local Area Plan for this area by delivering housing on this zoned site.</p> <p>We note that the proposed development secures the NPF objectives as discussed in the section above under 'National Planning Framework' through the delivery of housing on this site adjacent to existing residential land and close to Arklow's town centre. This will activate a site that has been zoned for development for c.20 years.</p> <p>This proposal is fully in accordance with the Building Height Guidelines 2018 and the NPF.</p>
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SPPR 3 of the Guidelines state:

It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.

The Development Management criteria are assessed in greater detail below:

Development Management Criteria	Evaluation of Consistency
At the Scale of the Town	
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	This is a peripheral greenfield site. However, it has existing permitted routes into the town centre for pedestrians and cyclists. This will be further enhanced through the delivery of a boardwalk which will take residents directly into the Main Street. The Main Street will be c.10 minute walk away. Off the Main Street there are several bus route as well as the Arklow Train Station connecting the site to a good public transport network.
Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/ enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks and protection of key views. Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect.	The proposed development seeks to deliver a predominantly two storey development with 3 storey duplex apartments and 5 storey apartment blocks located at the neighbourhood centre. The increased height in this location will provide legibility to the neighbourhood centre. The height has been considered sensitively to ensure it integrates with the surrounding area and will not impacts on key landmarks or views.
On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces,	The proposed development has been designed by 3 separate architects creating 4 different character areas to create an attractive new suburban neighbourhood. A series of streets, public open spaces are included

using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.	throughout the development to provide visual interest within the development. The street scene take account of the challenging topography of the site, enabling the houses to step appropriately to reflect the area. The only area of increased height is around the neighbourhood centre in order to provide legibility to the area.
At the Scale of the Neighbourhood	
The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape	The proposed development has been carefully designed to respond to the existing situation surrounding the site, which is predominantly characterised by two storey housing. The proposed development will reflect the existing situation but with an increased density to reflect the NPF and Compact Settlement Guidelines. The increase in height in key locations will ensure visibility around the site and will provide a positive contribution to the streetscene.
The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials / building fabric well considered.	The proposed development is broken into attractive urban blocks separate by public open space and roads. All blocks turn corners appropriately ensuring each road has an attractive frontage. There are no single monolithic buildings proposed within the development.
The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/ marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of "The Planning System and Flood Risk Management – Guidelines for Planning Authorities" (2009).	The proposal introduces a new public open space to the south of the site. Furthermore, the scheme allows enhances the existing planting in the area with new native species throughout the site. It also protects all watercourse. The proposed new boardwalk will provide access across the marsh without interfering with the marsh, ensuring its ecological sensitivities are protected.
Makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.	<p>The proposed building height, which steps down to meet the neighbours, is designed to be slightly higher at the neighbourhood centre to create legibility with in the development. The remainder of the development will blend into the existing area in a cohesive manner.</p> <p>The four character areas also create distinct neighbourhoods within the development creating a clear sense of place.</p> <p>The proposal provides a mix of communal and public open spaces throughout the scheme with ease of access for all residents.</p>
The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	The proposal will significantly improve the mix of residential types in the area which is dominated by large family housing. The proposal comprises of a mix of unit types including one, two and three bed apartments/ duplex apartments as well as 2, 3 and 4

	bed houses. The provision of these units, in a largely family housing area will enhance the unit typologies currently available in the area.
At the scale of site/building	
The form, massing and height of proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light	The layout and design of the buildings and the gaps between them have been orientated and designed to ensure the maximum amount of natural daylight, ventilation and views within the development while also ensuring there is no loss of light or overshadowing to the existing neighbours.
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'	3D Design Bureau completed a Sunlight Daylight Analysis for all apartment and duplex apartments. As discussed above in the report, this analysis demonstrates excellent % compliance rate has been achieved in terms of internal daylight of the units tested.
Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.	The proposed open space is also entirely in compliance with BRE Guide 3 rd Edition with all of the communal/public open space receiving more than 2 hours of sunlight on March 21 st .
Specific Assessments	
Specific impact assessment of the micro-climatic effects such as downdraft. Such assessments shall include measures to avoid/mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative micro-climatic effects where taller buildings are clustered.	The proposed development does not provide a "cluster" of tall buildings. The development is predominantly two storey with only two 5 storey buildings within the development the proposed development is unlikely to result in micro-climatic effects.
In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and / or collision.	Please refer to the appendices of the Biodiversity Chapter for the EIAR by Altamar which includes a Bat Fauna assessment, a Winter Birds Survey and a Breeding Birds Survey. This provides appropriate mitigation measures for the development to ensure that any impact is minimised and mitigated against.
An assessment that the proposal allows for the retention of important	The proposal will not alter the existing telecommunication channels in the area.

telecommunication channels, such as microwave links.	
An assessment that the proposal maintains safe air navigation.	The subject site is not within a flight path and is therefore not expected to impact air navigation.
An urban design statement including, as appropriate, impact on the historic built environment	A detailed Architects Design Statement prepared by BKD Architects demonstrates that this development is appropriate to its context and will not have a detrimental impact on the wider area or indeed the historic built environment.
Relevant environmental assessment requirements, including SEA, EIA, AA, and Ecological Impact Assessment, as appropriate.	The site and location have been assessed from an ecological perspective and in relation to potential impact on European sites. We refer to the AA Screening, and CEMP prepared by Altamar submitted with this application.

We note the following compliances with the SPPRs of the Guidelines:

Specific Planning Policy Requirement	Evaluation of Consistency
<p>SPPR 1</p> <p>In accordance with Government policy to support increased building height and density in locations with good public transport accessibility, particularly town/ city cores, planning authorities shall explicitly identify, through their statutory plans, areas where increased building height will be actively pursued for both redevelopment, regeneration and infill development to secure the objectives of the National Planning Framework and Regional Spatial and Economic Strategies and shall not provide for blanket numerical limitations on building height.</p>	<p>The site is a zoned Mixed Use site, which under AAP3 of the LAP is identified for a residentially led development. This proposed development is fully in accordance with the zoning and the statutory plans for this site, as well as the NPF.</p> <p>The increase in height is local to the neighbourhood centre only to create a legibility to the neighbourhood centre.</p> <p>The site, due to its permitted and proposed connections, will be well connected to Arklow Town Centre including the Main Street and Dublin Road, ensuring it is within walking and cycling distance of a range of amenities, and employment areas.</p>
<p>SPPR 2</p> <p>In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision, and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities</p>	<p>The proposed development provides for a housing scheme and apartment development along with new public open spaces and a boardwalk and a regional road. It also includes for a new neighbourhood centre around which the increased building heights are proposed, the remainder of the development is two storey housing. Therefore, the proposed development is considered a comprehensive development, the phasing of which will ensure that the neighbourhood centre, access routes and public open spaces are delivered within the early phases of development ensuring appropriate infrastructure is in place for future residents. This is in addition to the existing facilities within Arklow Town Centre which the site is close to.</p>
SPPR 3	The proposal is in accordance with the Development Management Criteria as set out in the table above.

<p>It is a specific planning policy requirement that where; (A) 1. an applicant for planning permission sets out how a development proposal complies with the criteria above; and 2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines; then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.</p>	<p>This proposal is in accordance with the national and regional guidance as fully detailed in the Statement of Consistency that forms part of this Planning Report.</p>
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Evaluation of Consistency

The proposed development is located on a zoned mixed use development site, under AAP3 of the Arklow LAP, and is close to the town centre of Arklow. It is abutting existing residential development to the east of the site. The proposal will also deliver a new neighbourhood centre which will have an increase in height up to 5 storeys only, providing legibility to this area. The remainder of the site will be two storey housing. Therefore, the location of the proposed increase in height of the buildings is considered in accordance with the Building Height Guidelines 2018.

Having regard to the response to each element of the Development Management Criteria outlined above, it is our considered opinion that the proposed development meets the criteria under Section 3.2 of the *Building Height Guidelines 2018*. The application proposes a development principally ranging in height from 2 to 5 No. storeys.

The proposed development will integrate appropriately with the surroundings, having regard to the location of the subject site adjacent to the two storey housing in Avondale Crescent and Murrell Drive, and its proximity, via the new proposed boardwalk, to the main street in Arklow. This results in the site being well served by existing amenities in the area.

It is our opinion that the increased height to 5 storeys within the neighbourhood centre is appropriate for the site and in accordance with the NPF and the *Building Height Guidelines 2018* which encourages increased height and density in sustainable and underused sites close to existing built up areas and to enhance the streetscene. The proposed development has been designed to ensure the protection and amenity not only of future occupants of this development but also those of the existing residents in the adjacent properties. To this end the highest elements have been located furthest away from existing residents at the least sensitive locations within the subject site.

SUSTAINABLE URBAN HOUSING: DESIGN STANDARDS FOR NEW APARTMENTS, 2023

The Apartment Guidelines 2023 promote sustainable housing, by ensuring that the design and layout of new apartments provide satisfactory accommodation for a variety of household types and sizes, including families with children over the medium to long term. The guidelines provide for updated guidance on apartment developments in response to the NPF and Rebuilding Ireland. These guidelines replace the Sustainable Urban Housing: Design Standards for New Apartments 2020.

In relation to appropriate locations for apartment developments and increased density the Guidelines identify 3 urban location types. “Peripheral and/ or less Accessible Locations” are identified as those which can accommodate limited, very small scale (will vary subject to location), higher density

development that may wholly comprise apartments, or residential development of any scale that will include a minority of apartments at low-medium densities (will also vary, but broadly <45 dwellings per hectare net), including

- Sites in suburban development areas that do not meet proximity or accessibility criteria;
- Sites in small towns or villages.

The range of locations outlined above is not exhaustive and will require local assessment that further considers these and other relevant planning factors.

While the provision of apartments may not be required below the 45 dwellings per hectare net density threshold, they can allow for greater diversity and flexibility in a housing scheme, whilst also increasing overall density. Accordingly, apartments may be considered as part of a mix of housing types in a given housing development at any urban location, including suburbs, towns and villages.

The Guidelines outline a number of Specific Planning Policy Requirements (SPPRs) which are design standards that apartment developments nationally are expected to adhere to.

SPPR 1	Evaluation of consistency
Housing developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).	The proposed development provides 88 no. apartments/ duplex apartments comprising: <ul style="list-style-type: none"> • 24 no. 1 beds • 51 no. 2 beds • 13 no. 3 beds It is therefore compliant with the stated housing mix in the guidelines.
SPPR 2	Evaluation of consistency
For all building refurbishment schemes on sites of any size, or urban infill schemes on sites of up to 0.25ha: <ul style="list-style-type: none"> - Where up to 9 residential units are proposed, notwithstanding SPPR 1, there shall be no restriction on dwelling mix, provided no more than 50% of the development (i.e. up to 4 units) comprises studio-type units; - Where between 10 to 49 residential units are proposed, the flexible dwelling mix provision for the first 9 units may be carried forward and the parameters set out in SPPR 1, shall apply from the 10th residential unit to the 49th; - For schemes of 50 or more units, SPPR 1 shall apply to the entire development; All standards set out in this guidance shall generally apply to building refurbishment schemes on sites of any size, or urban infill schemes, but there shall also be scope for planning authorities to exercise discretion on a case-by-case basis, having regard to the overall quality of a proposed development	N/A. Please see SPPR1 and SPPR 7

SPPR 3	Evaluation of consistency
Minimum apartment floor areas: studio apartments (1 person) 37sqm 1 bedroom apartment (2 persons) 45sqm 2 bedroom apartment (4 persons) 73sqm 3 bedroom apartment (5 persons) 90sqm	The current proposal achieves these standards as set out in the Housing Quality Assessment.
SPPR 4	Evaluation of consistency
In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following apply i. ii. In suburban or intermediate locations it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme. iii.	The current proposal proposes 75% dual aspect units which is higher than the minimum 50% required for peripheral/ less Accessible Locations such as this.
SPPR 5	Evaluation of consistency
Ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by-case basis, subject to overall design quality	The proposed building achieves this standard within each block.
SPPR 6	Evaluation of consistency
A maximum of 12 apartments per floor per core may be provided in apartment schemes. This maximum provision may be increased for building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha , subject to overall design quality and compliance with building regulations.	Each apartment core has 12 or less than 12 apartment per core in accordance with SPPR6.

EVALUATION OF CONSISTENCY with Apartment Guidelines

BKD Architects have prepared a Housing Quality Assessment which demonstrates how the proposal is in accordance with the space requirements in Appendix 1.

Overall, it is considered that the proposed development will provide a high-quality residential development with some well designed apartment and duplex apartments in line with the Apartment Guidelines.

GUIDELINES FOR PLANNING AUTHORITIES ON CHILDCARE FACILITIES, 2001

These guidelines state that Development Plans should facilitate the provision of childcare facilities in larger new housing estates with the standard minimum provision of one childcare facility with 20 places for each 75 dwellings.

Section 4.7 of the *Guidelines for Apartments*, 2022 states the following:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one child-care facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms.**”*

Evaluation of consistency

A two storey creche is proposed within the neighbourhood centre. This creche will measure c. 1,095sqm. It is estimated that this creche could accommodate c. 200 no. children and is therefore sufficiently sized to accommodate the 124 potential children which could arise from this proposed development.

The number of children arising from this development is estimated based on the omission of all 1 bed apartments and half of the two bed units, resulting in 467 no. units. $((467/75)*20)$. The proposed creche is located to the north-west corner the of site within the neighbourhood centre which will be in the centre of the site once phase 2 is delivered and is considered to be the most optimal position due to its proximity in relation to the access road and drop off area, and to ensure privacy.

GUIDELINES FOR PLANNING AUTHORITIES ON THE PLANNING SYSTEM AND FLOOD RISK MANAGEMENT, 2009

These guidelines require the planning system to avoid development in areas at risk of flooding, particularly floodplains, unless there are proven wider sustainability grounds that justify appropriate development and where the flood risk can be reduced or managed to an acceptable level without increasing flood risk elsewhere.

The Guidelines adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, reduction and mitigation of flood risk; and incorporate flood risk assessment into the process of making decisions on planning applications and planning appeals.

Evaluation of consistency

A Site-Specific Flood Risk Assessment has been carried out by DOBA Consulting Engineers. This report concluded that

All existing information has been reviewed regarding the flood risk in the area and the Avoca Flood Relief Scheme flood risk mapping is considered to have the most up to date and reliable estimates of extreme water levels. This mapping provides estimated water levels associated with a 10% AEP event, 1% AEP event (Flood Zone A) and 0.1% AEP event (Flood Zone B), 2.03 m OD Malin, 2.72 m OD Malin, and 3.24 m OD Malin, respectively. The lowest proposed Finished Floor (6.865 m OD Malin) and Road (5.250 m OD Malin) Levels within the development are above the predicted 1% AEP and 0.1% AEP water levels.

The proposed Finished Floor and Road levels and the surface water drainage network associated with the developed site will result in the risk of pluvial flooding within the site being reduced further from that indicated by the PFRA. In addition, the proposed SuDS measures and restriction of run-off to greenfield run-off rates mean that there will not be an increase in flood risk as a result of the proposed development.

The majority of the proposed development is classified as Highly Vulnerable Development by the

Planning System and Flood Risk Management Guidelines and would be best suited to Flood Zone C. The proposed Finished Floor Levels are above the estimated 1 in 1000-year return period fluvial flood event placing the units within Flood Zone C. The proposed finished road levels are also above the estimated 1 in 1000-year return period fluvial flood level which means that access to and from the residential units is at a low risk of flooding.

The proposed boardwalk has been carefully designed to minimise impact on the Avoca Marsh including the Environmental, Biodiversity Hydrology and Hydrogeology aspects of the marsh. As a result, the boardwalk deck level has been set at +4.00mOD, above the 1:1000-year flood level of 3.24mOD. The underside of the deck construction has also been designed with a freeboard exceeding the required 300mm. As a result, the entirety of the Boardwalk element of the proposed development has been raised above the Flood Zone A/B and it is considered that it is at low-risk from flooding.

The proposed greenway and associated embankments located within the flood zone to the south of the site have been calculated to displace approximately 1825m³ of flood volume during the 1:1000-year event. It is proposed to provide compensatory storage in the southern greenspace (located in Flood Zone C) to account for any displaced volume lost to the greenway embankments. An area of approximately 1046m² has been identified as being suitable to regrade the ground 1.35m lower to approximately 1.89mOD to allow for lost flood volume to be catered for. Section 7.1.4 outlines the justification test for the minimal portion of embankments/ landscaping located within Flood Zone A/ B, identifying these areas such as Amenity Open Space as Water Compatible which concludes that the proposals outlined do not increase the risk of flooding on the subject site or adjacent developments.

REGIONAL SPATIAL AND ECONOMIC STRATEGY 2019-2031



The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the eastern regional to 2031 and beyond which is a new concept in Irish Planning tying spatial planning to economic factors. The region covers nine counties, Longford, Westmeath, Offaly, Laois, Louth, Meath, Kildare, Wicklow, and Dublin.

The RSES will support the implementation of Project Ireland 2040 – the National Planning Framework (NPF) and National Development Plan (NDP). It addresses employment, retail, housing, transport, water services, energy and communications, waste management, education, health, sports and community facilities, environment and heritage, landscape, sustainable development and climate change. The vision for the RSES is *to create a sustainable and competitive region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all.*

The RSES along with the NTA and Local Authorities have developed Guiding Principles for Integration of Land Use and Transport in the region. These include:

- For urban-generated development, **the development of lands within or contiguous with existing urban areas should be prioritised** over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised.

- The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. Accessibility by car does need to be provided for, but in a manner, which complements the alternative available modes. Local traffic management and the location / management of destination car parking should be carefully provided.
- Planning at the local level should prioritise walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools.
- Support the '**10 minute**' **settlement concept**, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements.
- Cycle parking should be appropriately designed into the urban realm and new developments at an early stage to ensure that adequate cycle parking facilities are provided.
- Support investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport and support the use of design solutions and innovative approaches to reduce car dependency.

Arklow - Key RSES Provisions

It is envisaged that Arklow has the capacity to become more self-sustaining. Arklow, located in Wicklow is identified as falling within the Eastern Region of the RSES. Arklow is also identified as falling within the Core Region where growth enablers include:

- The promotion of continued growth at more sustainable rates
- Commensurate population growth in key towns.

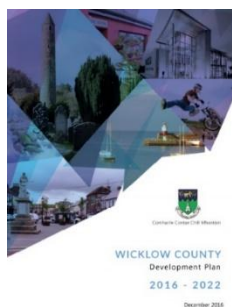
Evaluation of Consistency

The subject development seeks to provide for a residential development on a zoned development site within the Arklow Settlement immediately bordering existing residential estates and within walking distance of existing social infrastructure. This proposal will increase the population of the town and provide more housing choice in the area.

This proposal is in line with the principles of a compact development by providing housing within walking and cycling distance of Arklow Town Centre and its range of shops, restaurants, community and social infrastructure. It will also further support the development of new infrastructure by providing a neighbourhood centre with a creche, 3 retail units and 3 community/ health units. It will also provide a new boardwalk across the Avoca River into Arklow Main Street. Furthermore the population from the development will provide support and students for the new permitted education campus to the north of the subject site.

Overall, it is respectfully submitted that the proposed development is in accordance with the vision and objectives of the RSES.

WICKLOW COUNTY DEVELOPMENT PLAN 2022-2028



The subject site is within the administrative area of Wicklow County Council and as such is also subject to the provisions, policies and objectives of the Wicklow County Development Plan 2022-2028. The Wicklow County Development Plan 2022-2028 came into effect on the 23rd of October 2022. *“The Wicklow County Development Plan 2022-2028 sets out the overall strategy for the proper planning and sustainable development of the County for the plan period and beyond.”*

Chapter 3 and 4 of this Development Plan sets out the Core Strategy and Settlement Hierarchy for the county. Arklow is identified as being a level 3 self-sustaining Growth Town within the Core Region. A Self-Sustaining Growth Town is defined to contain *“moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.”*

Level 3 towns are targeted for growth rates of 25 – 30%, *“with slight variations based on capacity/past trends.”* The population of Arklow is targeted to increase from 13,226 in 2016 to 15,419 in Q2 of 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		

Table 4 Table 3.4 Wicklow Settlement/Aggregate Settlement Population Targets 2016, Q2 2028 (WCC DP 2022-2028)

Table 3.5 of the Development Plan provides Settlement Housing Targets to Q2 2028 and Q4 2031. The figure below displays Arklow Settlements estimations for housing supply.

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

Table 5 Settlement Housing Targets (WCC DP 2022-2028)

Evaluation of Consistency

The subject lands are allocated and zoned for mixed residential, community and open space zone. The proposed development will provide for 666 residential units (when phase 1a of Character Area 1A is included it is 750), at an appropriate density of c.35.2 units per hectare (net) along with a new local centre providing community/ health/ retail and a creche facility. The proposed development will help towards achieving the 2031 target of 1,221 additional units.

The proposed development is therefore considered to be consistent with the county plan core strategy.

Policy/Objective	Statement of Consistency
Chapter 4 – Settlement Strategy	
Housing Occupancy Controls - As a 'Self-Sustaining Growth Town', the settlement should provide urban housing for people from across the County and region.	The proposed development is envisaged to provide additional urban housing for an increase population in Arklow, a self sustaining growth town.
CPO 4.1 To implement the County Wicklow Core Strategy and Settlement Strategy, having regard to the availability of services and infrastructure and in particular, to direct growth into key towns, self sustaining growth towns, self-sustaining towns and small towns.	The proposed development is located within Kilbride, Arklow. Arklow is considered a self sustaining growth town and is envisaged to increase it's population as well as it's housing supply. The proposed development will increase the provision of housing by 666 units which contributes towards the overall goal of 1,221 additional units by Q4 2031.
CPO 4.2 To secure compact growth through the delivery of at least 30% of all new homes within the built-up footprint of existing settlements by prioritising development on infill, brownfield and regeneration sites and redeveloping underutilised land in preference to greenfield sites.	<p>The proposed development is located within lands zoned for residential purposes under the Arklow and Environs LAP 2018-2024. Although the site is greenfield in nature, it is zoned for residentially led mixed use development as part of the development strategy and is part of an overall Action Area Plan listed as AAP3 under the Arklow LAP 2018-2024.</p> <p>The development of lands within the AAP3 lands will deliver the LAP strategy and will contribute towards ensuring appropriate, plan development is achieved within Arklow. Please see the Justification Report submitted with this application by MCG Planning.</p>
CPO 4.6 To require new housing development to locate on designated housing land within the boundaries of settlements, in accordance with the development policies for the settlement.	The subject site is zoned under AAP3 in the LAP as mixed use development land. This proposes a predominantly residential development with public open space and a neighbourhood centre on these lands. This is the first phase of this development. The principle of residential development in this location is acceptable on this site and is in accordance with the zoning of the land. This will enable the delivery of the houses required by the Development Plan in line

	with the planning strategy for the Arklow area within the town boundaries.
Chapter 6 – Housing	
<p>6.3.1 Sustainable Communities</p> <p>Sustainable communities require a variety of house types, sizes and tenures. It is important that new multi-unit residential development provides an appropriate mix that caters for a variety of household types and sizes.</p>	<p>This proposed development will provide for a mix of 1, 2 and 3+ bedroom residential units in a mix of duplex apartments/ apartments and houses. The proposal also includes Universally Designed units. There will also be Part V units to provide an appropriate tenure mix. Therefore, this development will cater for a variety of housing needs from single people, couples, down sizers and families.</p>
<p>6.3.2 Location of new residential development</p> <p>Where insufficient land is available in the centres of settlements, new housing development shall also be permitted on greenfield lands that are zoned / designated for housing.</p> <p>The zoning / designation of greenfield land for new housing shall adhere to the following principles:</p> <ul style="list-style-type: none"> • Application of the ‘sequential approach’ whereby zoning extends outwards from centres, contiguous to the existing built up part of the settlement; • Application of compact growth targets; • Creation of ‘walkable’ neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritised; • Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of any rail or light rail stop or 500m of bus routes will be prioritised; • Application of the tiered zoning approach in accordance with NPO 72 whereby land that is fully serviced is differentiated from land that can be serviced within the lifetime of the plan; • Lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritised; • Cognisance will be taken of the need to provide upmost protection to the 	<p>Please see the above Phasing Justification within this planning report.</p> <p>This Justification identifies the need for this land to be delivered.</p> <p>It also demonstrates that this site is the next sequentially available site that can be delivered as other zoned land, which is ahead identified for earlier delivery in the LAP, are unlikely to be delivered at the moment either due to land ownership constraints or infrastructural constraints. Where planning permission has been granted on the AAP2 site, there remain constraints due to the conditions placed on the permission. This development, if it runs concurrently with the subject site, will deliver some of the identified housing need. Therefore, this development will complement this delivery and enable the housing targets for Arklow to be achieved. This site, given the single land ownership and the few constraints associated with the site is the optimum, next available and <u>deliverable</u> site that is zoned within the LAP.</p> <p>This site will facility the delivery of compact growth by providing residential development immediately adjacent to the existing residential development within Arklow Town.</p> <p>It will also enhance the walkable neighbourhood strategy by providing an attractive new link through the application site up to the Kilbride Educational Campus, enabling more people to walk or cycle from the Town Centre to the school in a safe and attractive route.</p> <p>As demonstrated by the TIA this site is within easy walking and cycling distance of both the</p>

<p>environment and heritage, particularly of designated sites, features and buildings;</p> <ul style="list-style-type: none"> • Prioritisation of environmental and sustainability considerations for meeting sustainable development targets and climate action commitments in accordance with the National Adaptation Framework – examine environmental constraints including but not limited to biodiversity, flooding, and landscape; • The need to maintain the rural greenbelt between towns. 	<p>bus service and also the train routes enabling a more sustainable modal choice.</p> <p>The delivery of this land is in line with the LAP for Arklow.</p> <p>The site will be serviced and connected to the Irish Water network including the new wastewater facility.</p> <p>This proposal will not impact on any designated environmental or heritage sites.</p> <p>The proposal will contribute towards the existing biodiversity and ecology on site and will result in additional planting of native trees and hedgerows. The SFRA demonstrates that there will be no additional flooding as a result.</p> <p>The proposal will not impact on the rural greenbelt.</p>
<p>6.3.4 Phasing</p> <p>The development of zoned / designated land should generally be phased in accordance with the sequential approach:</p> <ul style="list-style-type: none"> • Development shall extend outwards from the centre of settlements with undeveloped land closest to the centre and public transport routes being given preference, i.e. ‘leapfrogging’ to peripheral areas shall be resisted; • A strong emphasis shall be placed on encouraging infill opportunities and better use of under-utilised land; and • Areas to be developed shall be contiguous to existing developed areas. <p>Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.</p>	<p>Please see the Phasing Justification above.</p> <p>This site is has the benefit of being the next phase of development following the grant of permission for 84 no. units to the south east of the site. This permission provides for a permitted vehicular access route into the site as well as a pedestrian route to the south east of the site. This proposed application will enhance this provision through the provision of a boardwalk to the south of the site connecting directly to the south bank of the Avoca River.</p> <p>Therefore this site, with its additional proposed pedestrian links in addition to the permitted links is considered to extend out into the existing settlements. This will enable easier access to the new Kilbride Educational Campus, and also the Bridgewater centre, along with ready access to public transport. It is therefore considered to be an appropriate site in terms of location and availability for delivery.</p> <p>In order for Arklow to achieve its housing targets it is necessary for these lands, the subject of this application, plus the AAP2 lands to come forward in the short term . It is therefore considered appropriate for this application to be delivered at this time.</p>

<p>6.3.5 Densities Large Towns (Bray, Greystones-Delgany, Arklow, Wicklow –Rathnew and Blessington)</p> <ul style="list-style-type: none"> Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station. Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare. Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares. 	<p>This site is considered to be a zoned greenfield site. It achieves 35 units per hectare in line with this policy.</p>
<p>6.3.6 Universal Design & Lifetime Adaptable Housing New developments, where possible, should include universally designed homes that can be easily adapted to meet people’s changing needs over time.</p>	<p>Universal Design Standards and Lifetime Adaptable Housing will be delivered throughout the development.</p>
<p>6.3.7 Quality of Design in New Housing Developments New housing development should be designed to respect its setting and provide for a strong connection with the character of the existing settlement. Particular attention should be paid to boundaries, public space and planting in order to achieve good quality. Permeability should inform the layout and design. New residential and mixed-use schemes should deliver attractive street-based traditional town environments that incorporate a good sense of enclosure, legible streets, squares and parks and a strong sense of place. Developments should include an effective mix of heights that integrates well with the existing urban structure and historical streetscapes.</p>	<p>The proposed development is a residential development which ties into the existing residential development to the east. It is predominantly two storey rising up to 5 storey in the local centre. 3 different architecture firms have designed 4 character areas to provide variation and legibility throughout the development.</p> <p>Public open space is distributed throughout the proposal including a new attractive playground and walk overlooking the Marsh. Appropriate boundary treatments and planting are provided throughout the development.</p> <p>The proposal provides excellent cycle and pedestrian links into the site and to the new educational campus to the north.</p> <p>All the streets are designed to be over looked and legible, with clear wayfinding provided through the variety of units and open spaces as you travel through the site.</p>
<p>CPO 6.1 New housing development shall be required to locate on suitably zoned or designated land in settlements and will only be considered in the open countryside when it is for the provision of a rural dwelling for those with a demonstrable housing social or economic need to live in the open countryside.</p>	<p>This is a zoned designated site under AAP 3 of the LAP.</p>

<p>CPO 6.3 New housing development shall enhance and improve the residential amenity of any location, shall provide for the highest possible standard of living of occupants and in particular, shall not reduce to an unacceptable degree the level of amenity enjoyed by existing residents in the area.</p>	<p>The proposal includes new attractive housing adjacent to existing residential development. All of the units meet the development standard requirements. New public open spaces are provided throughout which are available for both the existing and future residents of the development. The proposed houses are set located away from the shared boundary with the existing residential development providing an attractive parkland and buffer between the application site and the existing residential development, ensuring the same level of residential amenity will be enjoyed by the existing neighbours after this development is completed.</p>
<p>CPO 6.4 All new housing developments (including single and rural houses) shall achieve the highest quality of layout and design, in accordance with the standards set out in the Development and Design Standards (Appendix 1) and the Wicklow Single Rural House Design Guide (Appendix 2).</p>	
<p>CPO 6.5 To require that new development be of the highest quality design and layout and contributes to the development of a coherent urban form and attractive built environment in accordance with the following key principles of urban design:</p> <ul style="list-style-type: none"> • Strengthening the character and urban fabric of the area; • Reinforcing local identity and sense of place; • Optimise the opportunities afforded by the historical and natural assets of a site / area; • Providing a coherent, legible and permeable urban structure; • Promoting an efficient use of land; • Improving and enhancing the public realm; • Conserving and respecting local heritage; • Providing ease of movement and resolving conflict between pedestrians/cyclists and traffic; • Promoting accessibility for all; and • Cognisance of the impact on climate change and the reduction targets for carbon emissions set out by the Government. 	<p>Please see the BKD Architects Design Statement and drawing packs by BKD, CCK and Hogan architecture together with the NMP Landscape Architects pack which demonstrates the high quality design of this development.</p> <p>The proposed homes are all designed using contemporary design and high quality materials, while also providing attractive curves throughout the development.</p> <p>All of the areas are fully accessible for everyone.</p> <p>The density is higher than the surrounding area however, it will make the most use of this scarce resource and the density at 35uph is in line with Development Plan policy.</p> <p>All of the units will be built to ensure that reduce carbon emissions and are efficient homes.</p>
<p>CPO 6.6 To require that all planning applications for multi-unit residential development are accompanied by a Design Statement. Design Statements shall include a detailed assessment of existing environment and historic character and demonstrate how the design has evolved in response to these underlying characteristics and fabric of the town / village. The Design Statement should address each of the 12 criteria set out in the Urban Design Manual (DECLG May 2009). The layout, access, road widths and open space should be cognisant of town and village character.</p>	<p>Please see the Design Statement. This addresses all of these elements as well as the 12 Criteria set out in the Urban Design Manual.</p>

<p>CPO 6.7 The design and layout of new residential and mixed-use development shall deliver highly permeable, well-connected streets which facilitate active street frontage in accordance with best practice set out in the Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (DEHLG May 2009) and the Design Manual Urban Roads and Streets (DTTS & DECLG 2013).</p>	<p>As demonstrated by the Architects Packs all of the streets and open spaces are overlooked and provide an appropriate, active street frontage with front doors onto roads within this residential development. This is in line with Best Practice listed.</p>
<p>CPO 6.8 Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time and in particular to require that all new residential developments in excess of 20 residential units to provide a minimum 5% universally designed homes in accordance with the requirements of 'Building for Everyone: A Universal Design Approach and the Universal Design Guidelines for Homes in Ireland (2015).</p>	<p>Please see the Schedule of Accommodation. In addition to this all other houses are adaptable in line with lifetime homes.</p>
<p>CPO 6.9 To implement the provisions of the Wicklow Housing Strategy and in particular, to apply a 10% (or a greater percentage if provided for in future legislation) social housing requirement pursuant to Part V of the Planning and Development Act 2000 (as amended) to land zoned for residential use, or for a mixture of residential or other uses, except where the development would be exempted from this requirement. In certain circumstances, as set out in the Affordable Housing Act 2021, this requirement will be 20% devoted to social and affordable housing.</p>	<p>Please see the enclosed Part V proposal submitted with this application. This proposes 10% Part V units in line with current legislation.</p>
<p>CPO 6.13 To require that new residential development represents an efficient use of land and achieves the minimum densities as set out in Table 6.1 subject to the reasonable protection of existing residential amenities and the established character of existing settlements. In promoting higher densities and more compact development, new development should demonstrate compliance with:</p> <ul style="list-style-type: none"> • the Sustainable Urban Housing Guidelines for Planning Authorities (DEHLG 2009) and accompanying Urban Design Manual – A Best Practice Guide; • Quality Housing for Sustainable Communities (DoEHLG 2007); • Design Standards for New Apartments Guidelines for Planning Authorities (2018) • Design manual for Urban Roads and Streets; and 	<p>In line with Table 6.1 and the guidelines listed the proposed density is c.35.2uph. This will deliver an attractive density and due to its location, and the distance between the proposed and existing developments will ensure existing residential amenities are protected.</p>

<ul style="list-style-type: none"> any subsequent Ministerial guidelines. <p>Table 6.1 states that “Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare.”</p>	
<p>CPO 6.18 To ensure that building height within future development makes a positive contribution to the built form of the area, is not obtrusive and does not adversely impact on the streetscape, local amenity or views. Require all development proposals, including infill development, to include an analysis of the impact of building height and positioning of buildings on:</p> <ul style="list-style-type: none"> The immediate & surrounding environment - streetscape, historic character; Adjoining structures; Open spaces and public realm; Views and Vistas. 	<p>The proposed development ranges in height from 2 to 5 storeys, which is in keeping with the existing building height in the immediately surrounding area to the east which is predominantly two storey housing.</p> <p>The increased height has been strategically located to provide visual interest and legibility within the development.</p>
<p>CPO 6.20 Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.</p> <p>New significant residential or mixed use development proposals (of which residential development forms a component), shall be required to be accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</p> <p>New significant residential or mixed use development proposals shall be required to be accompanied by a ‘Accessibility Report’ that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:</p> <p>(a) local services including shops, schools, health care and recreational facilities, and</p> <p>(b) public transport services.</p>	<p>This proposed development is part of a wider masterplan development for over 1,500 units as allocated under AAP3.</p> <p>The proposed development will deliver a new road from Kilbride Road, past the new Kilbride Educational Campus, to the application site. This will facilitate better cycling and pedestrian links for the permitted schools through the application site to the Dublin Road and Arklow town centre. It will also deliver a new boardwalk from the site, across the Avoca River, resting on top of permitted debris traps, to the south side of the Avoca river. This will provide ready access to the Main Street.</p> <p>In addition to this new public park are proposed and a new local centre.</p> <p>The proposal also includes a new neighbourhood centre which will provide community/ medical facilities, a creche and retail units. This is in addition to the existing facilities within the wider area. It is also demonstrated in chapter 4 of the EIAR that these additional facilities will support the existing infrastructure and will not conflict with same.</p>

Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.	
CPO 6.27 To require new multi-unit residential development to provide an appropriate mix of unit types and sizes to ensure that there is a range of unit types available to suit the needs of the various households in the county, in accordance with the Design Standards for new Apartments, Guidelines for Planning Authorities (2020).	The proposed development includes 1, 2 and 3+ bedroom units in the form of houses and duplex/ apartments. This provides a range of choice for future occupants in line with this policy.
CPO 6.28 Apartments generally will only be permitted in settlements Levels 1 to 6 and in accordance with the location requirements set out in Section 2.4 of the Design Standards for New Apartments, Guidelines for Planning Authorities (2020). All apartment development should be served by high quality usable open space.	Arklow is a Level 3 Self Sustaining Town and as such is appropriate for apartments and duplex apartments in line with this policy. These have been designed in accordance with the Design Standards for New Apartments.
CPO 6.30 The maximum size of any single 'housing estate' shall be 200 units and developments that include more than 200 units should be broken into a number of smaller 'estates', which shall be differentiated from each other by the use of materially different design themes.	This proposed development is separated into 4 separate character areas designed by 3 architects creating different estates, ensuring legibility, placemaking and individuality for each area.
Chapter 7 – Community Development	
<p>CPO 7.5 Housing development shall be managed and phased to ensure that infrastructure is adequate or is being provided to match the needs of new residents.</p> <p>New significant residential or mixed use development proposals (of which residential development forms a component), shall be required to be accompanied by a Social Infrastructure Audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.</p> <p>New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants /</p>	<p>Chapter 4 of the EIAR demonstrates that the proposed development can be support and improve the existing infrastructure within Arklow through the delivery of a new local centre which has community/ health/ commercial uses as well as a creche.</p> <p>Furthermore, the proposed development will deliver a new road from Kilbride Road, past the new Kilbride Educational Campus, to the application site. This will facilitate better cycling and pedestrian links for the permitted schools through the application site to the Dublin Road and Arklow town centre.</p> <p>In addition to these new public parks are proposed as part of this development</p> <p>This is delivering a significant quantity infrastructure up front before phase 2 for the remaining 666 units (1,500 in total) are delivered across the site.</p>

<p>employees (including children and those with special mobility needs) will be able to safely access through means other than the private car</p> <p>(a) local services including shops, schools, health care and recreational and sports facilities, and</p> <p>(b) public transport services.</p> <p>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.</p>	<p>The TTA by Systra contains a Mobility Management Plan which demonstrates the accessibility of this site for cyclists and pedestrians to existing services in the area and public transport.</p>
<p>CPO 7.6 To require as part of any Social Infrastructure Audit process that the cumulative effects of similar large scale developments be appropriately factored as part of the audit when determining the capacity of the assessed infrastructure that will be affected by the increase in population. This is to ensure that the compounding effects of any such large scale increase to a local population will be adequately serviced with community infrastructure.</p>	<p>This has been addressed in the Chapter 4 of the EIAR.</p>
<p>CPO 7.8 To promote and support Universal Design whereby all environments and facilities can be used to the greatest extent possible by all people, regardless of age, ability or disability.</p>	<p>The proposed development, including all of the landscaped areas have been designed to be Part M compliant. 5% of all of the houses are UD compliant.</p>
<p>CPO 7.30 Where considered necessary by the Planning Authority, to require the provision of childcare facilities in all residential developments comprising 75 houses or more (including local authority and social housing schemes). In accordance with Department of Environment, Heritage & Local Government guidelines, childcare places shall be provided at a ratio of 20 places per 75 residential units, having regard to cumulative effects of permitted development, (unless it can be demonstrated that having regard to the existing geographic distribution of childcare facilities and the emerging demographic profile of the area that this level of childcare facilities is not required). Without substantial cause, it is the policy of the Planning Authority not to allow a change of use of these premises within five years.</p>	<p>A new creche facility is proposed within the local centre.</p>
<p>CPO 7.34 In all new residential development in excess of 50 units, where considered necessary by the Planning Authority, the developer shall provide, in the residential public open space area, a dedicated children's play area, of a type</p>	<p>Please see the Landscape Masterplan and Design Statement by NMP. This includes a dedicated children's play area which is overlooked and appropriately located.</p>

and with such features to be determined following consultation with Community, Cultural & Social Development Office of Wicklow County Council. The location of any such proposal shall be situated within a centrally located area capable of being passively supervised by surrounding developments.	
CPO 7.35 All new estates, streets, open spaces/parks and community facilities shall be designed with the needs and safety of children, the elderly and people with disabilities as a priority.	Noted. This has been achieved. This is demonstrated by the NMP Landscape Masterplan submitted with this application.
CPO 7.36 Subject to safety considerations, natural features (trees, streams etc) shall be retained in new developments.	Where possible all trees and hedgerows have been retained and enhanced. Please see the arborist report enclosed with the application.
CPO 7.47 To require open space to be provided in tandem with new residential development (in accordance with the standards set out in the Development & Design Standards Appendix).	Sufficient public open space, along with additional open space for the wider area is delivered within this development.
CPO 7.50 To require proposals for open space to include in their layout and overall design that will enhance and create greater biodiversity, in accordance with the objectives of Chapter 17 and 18 of this plan and the standards set out in the Development & Design Appendix.	Please see the landscape design report by NMP which demonstrates the proposed planting and overall enhancement achieved through this development.
CPO 7.52 All open spaces shall be provided with environmentally friendly lighting in order to ensure their safe usage after daylight hours, in accordance with Chapter 15 of this plan 'Light Pollution' and the standards set out in the Development & Design Appendix.	Please see the public lighting report and drawing by Fallon Engineering which demonstrates appropriate lighting throughout the development.
Chapter 10 - Retail	
CPO 10.2 To facilitate measures to improve the accessibility of centres by developing a pedestrian and cyclist friendly environment, which improves safety and limits traffic congestion where possible. It is the objective of the Council to promote accessibility to public transport. Development with a high potential for public transport utilisation by employees and visitors should be sited with ease of access to public transport facilities.	The proposed local centre is centrally located within the masterplan and is directly connected to Arklow Town Centre via a new pedestrian and cycle boardwalk. The development prioritises sustainable mobility through extensive footpath and cycleway networks, multiple access points, and a future mobility hub. These features directly support improved accessibility and encourage use of active and public transport modes in line with this policy.
CPO 10.4 To promote and facilitate the development of retail in a sustainable manner. Retail related development shall be located on suitably zoned land within settlement boundaries. There shall be a general presumption against the development of retail uses within the rural area, except as otherwise provided for by a particular objective of this plan.	Retail and service uses are located within a designated local centre on appropriately zoned land within the settlement boundary of Arklow.

<p>CPO 10.23 Within neighbourhood centres, it is the objective of the Planning Authority to protect, provide for, and improve the mix of neighbourhood centre services and facilities, which provide for the day-to day needs of the local community, to a degree that is akin to their role and function as outlined in the Retail Strategy. Development which would undermine the role of the town centre will not be permitted.</p>	<p>The proposed local centre includes a mix of essential neighbourhood services including retail, a crèche, and medical/community facilities arranged around a central public plaza. These uses serve the day-to-day needs of residents in a walkable format, complementing rather than undermining the primary role of the town centre. The scheme supports the neighbourhood centre function as outlined in the Retail Strategy.</p>
<p>CPO 10.24 To facilitate the provision of local retail units in residential areas where there is a clear deficiency of retail provision, subject to protecting residential amenity.</p>	<p>The proposed development responds to a clear lack of local retail provision in this growing residential area by delivering a well-designed, centrally located local centre with appropriate retail and services. The proposal includes measures to protect residential amenity, including high-quality design, landscape buffers, and pedestrian-friendly public realm.</p>
<p>CPO 10.25 Small scale retail development appropriate to the scale and needs of the settlement and its catchment will be positively considered subject to the following control criteria:</p> <ul style="list-style-type: none"> • there shall be a clear presumption in favour of central or edge of centre locations for new development, i.e. the traditional historical centre; • out of centre locations will not be considered suitable for new retail; • new development shall be designed with the utmost regard to the historical pattern of development in the centre and the prevailing character, with particular regard to building form, height and materials and shall generally be required to incorporate a traditional shop front. 	<p>The retail provision is appropriately scaled to meet the needs of the future residential population and is centrally located within the development. The architectural approach references traditional forms and materials appropriate to the site context, ensuring the built form respects the character of Arklow while integrating with the new urban neighbourhood. No out-of-centre retail is proposed.</p>
<p>Chapter 12 – Sustainable Transportation</p>	
<p>CPO 12.5 New significant residential or mixed use development proposals shall be required to be accompanied by an 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car</p> <p>(a) local services including shops, schools, health care and recreational facilities, and</p> <p>(b) public transport services.</p> <p>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or</p>	<p>The TTA by Systra contains a Mobility Management Plan which demonstrates the accessibility of this site for cyclists and pedestrians to existing services in the area and public transport.</p>

suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.			
CPO 12.8 To require the implementation of the following standards for EV charging in new developments:			Please see the architects site layout plan. This demonstrates that there is EV Charging based on the Development Plan Standard of 1 outlet per 10 units.
New (single-unit residential) buildings	New 'own door' dwelling with car parking space located within the property boundary	Installation of recharging points for electric vehicles on site.	
New (single-unit residential) buildings	New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.	Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents. Installation of ducting infrastructure for every parking space within development.	
CPO 12.13 To facilitate the development of pedestrian and cycle linkages through and between new and existing developments to improve permeability and provide shorter, more direct routes to schools, public transport, local services and amenities while ensuring that personal safety, particularly at night time, is of the utmost priority.			The proposed development includes for a new pedestrian and cycle access to the south and east. These connect onto the proposed new road providing a new safe and secure route up to the Kilbride Education Campus. This route will also provide ease of access to the Dublin Road, Bridgewater Centre, Arklow Town Centre and public transport. This route is appropriately lit.
CPO 12.30 Traffic Impact Assessments will be required for new developments in accordance with the thresholds set out in the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG) and the 'Traffic & Transport Assessment Guidelines' (TII).			Please see the TIA by Systra and the DMURS statement by DOBA.
CPO 12.31 Road Safety Audits, Road Safety Impact Assessments, Street Design Audits as per DMURS, or Accessibility Audits shall be required			The TTA by Systra contains a Mobility Management Plan which demonstrates the accessibility of this site for cyclists and

at the discretion of the Planning Authority, but shall generally be required where new road construction or a permanent change to the existing road / street layout is proposed.	pedestrians to existing services in the area and public transport.
CPO 12.33 To require all new or improved roads (of all designations) to include pedestrian facilities, cycle lanes / tracks (unless the scale / design of the road does not warrant such infrastructure (having regard to the guidance set out in the National Cycle Manual and DMURS), public lighting and bus stop facilities as deemed appropriate by the Local Authority.	The proposed new road has pedestrian and cycle facilities on either side of it.
CPO 12.34 The design of new roads or improvements to existing local roads and new means of access onto roads shall generally comply with the guidance set out in the 'Design Manual for Roads & Bridges' DMRB (TII), the 'Design Manual for Urban Roads and Streets' DMURS (DTTA-DHPLG), the 'Traffic Management Guidelines' (DoT-DoELG-DTO) and 'Recommendations for Site Development Works for Housing Areas' (DoELG) as appropriate. as may be amended and revised, unless local conditions determine otherwise.	Please see the road drawings by DOBA demonstrating that the roads have been designed in line with appropriate guidance. Please also see the DMURS statement by DOBA.
CPO 12.53 Where a proposed development is adjoining future development lands or provides the only possible access route to other lands, new roads will be required to be designed by the developer to ensure that future access to other lands can be facilitated.	The proposed development includes a new road that provides access to all the wider masterplan lands as zoned under AAP3.
<p>CPO 12.56 New / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points as set out in Objective CPO 12.8, with particular regard being taken of the potential to reduce private car use in locations where public transport and parking enforcement are available. At such locations, the car parking standards set out in Appendix 1 Table 2.3 shall be taken as maximum standards, and such a quantum of car parking will only be permitted where it can be justified.</p> <p>In locations where public transport and parking enforcement are not available, the car parking standards set out in Appendix 1 Table 2.3 shall be taken as minimum standard in order to ensure that haphazard unregulated car parking does not occur in the vicinity of the development. Deviations from this table may be considered in multi-functional developments</p>	Car parking has been designed in line with the Wicklow County Council Parking standards. The proposal includes for 1,185 no. car parking spaces throughout the development.

<p>(e.g. hotels, district centres), where the developer provides a robust model of car parking usage to show that dual usage will occur and that peak car parking demand at any time of the day / week will always be met or other situations that may be considered on a case-by-case basis.</p> <p>In situations where a developer cannot meet the necessary car parking requirement on or near the development site, the developer may request the Local Authority to accept a special payment in lieu, to be utilised by the Local Authority in providing car parking in the area.</p>	
<p>CPO 12.57 Provision shall be made in all new / expanded developments for Age Friendly and Disabled parking (and associated facilities such as signage, dished kerbs etc) at a suitable and convenient location for users.</p>	<p>Disabled parking is provided within the development in line with the Development Plan requirements.</p>
<p>Chapter 13 – Water Services</p>	
<p>CPO 13.3 To minimise alterations or interference with river / stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of generally 25m along watercourses should be provided (or other width, as determined by the Planning Authority having particular regard to ‘Planning for Watercourses in the Urban Environment’ by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible.</p>	<p>It is noted that the public open space to the east abuts a farmer’s ditch, separating the application site from the existing neighbouring residential. This is being retained, with additional planting of native hedgerows and trees and landscaping. All paths and cycle ways are designed to be c.20m away and all houses are c. 25m away.</p>
<p>CPO 17.26 Protect rivers, streams and other water courses by avoiding interference with river / stream beds, banks and channels and maintaining a core riparian buffer zone of generally 25m along watercourses (or other width, as determined by the Planning Authority having particular regard to ‘Planning for Watercourses in the Urban Environment’ by Inland Fisheries Ireland for urban locations) free from inappropriate development, with undeveloped riparian vegetation strips, wetlands and floodplains generally being retained in as natural a state as possible. Structures such as bridges should be clear span, and designed and built in accordance with Inland Fisheries Ireland guidance.</p>	

CPO 13.10 To require new developments to connect to public water supplies where services are adequate or where they will be provided in the near future, or where extension of an adjacent water supply system is technically and environmentally feasible.	Please see the Infrastructure Design Report. This demonstrates that the development will connect to public water supplies in line with the Confirmation of Feasibility by Uisce Eireann. A SODA is also submitted with this application.
CPO 13.14 To require all new developments to integrate water demand reduction designs and technologies in all aspects of the development including but not limited to: <ul style="list-style-type: none"> • Installation of water efficient equipment; • Provision of dual flush toilets, cistern bags or other similar technologies; • Construction of grey water systems to allow for the re-use of wastewater from sinks, shower drains or washing machines; • Provision of rainwater harvesting equipment; • The use of low maintenance plants in the design of landscaping; • In manufacturing, use of process or cooling loops, counter current rinsing and batch processing, or increasing the recycle rate of cooling towers. 	<p>The proposed development will include the Best Available Technology to ensure water demand reduction is achieved throughout the development.</p> <p>In addition to this and as set out in the IDR by DOBA Engineers a range of SUDS measures are proposed throughout the development.</p>
CPO 13.20 Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks	Please see the IDR and associated drawings by DOBA engineers which demonstrates that this can be achieved.
CPO 13.21 Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.	The IDR by DOBA Engineers a range of SUDS measures are proposed throughout the development.
CPO 13.22 To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.	the IDR by DOBA Engineers a range of measures throughout the development which includes the use of green infrastructure throughout the development.
Chapter 14 – Flood Risk Management	
CPO14.03 To recognise the concept of coastal evolution and fluvial flooding as part of our dynamic physical environment, and adopt an adaptive approach to working with these natural processes. The focus of a flood management strategy should not solely be driven by conservation of existing lands; it should recognise that marshes, mud flats and other	This is noted and addressed in the SFRA by DOBA submitted with this application.

associated eco-systems evolve and degenerate, and appropriate consideration should be given to the realignment of defences and use of managed retreat and sacrificial flood protection lands to maintain such habitats as part of an overall strategy.	
CPO 14.11 To limit or break up large areas of hard surfacing in new developments and to require all surface car parks to integrate permeability measures such as permeable paving.	Permeable paving is provided throughout the development. All of the surface car parking areas are broken up with appropriate planting. Please see the landscape plan by NMP.
CPO 14.13 Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. In particular to require proposed developments to meet the design criteria of each of the four pillars of SuDS design; Water Quality, Water Quantity, Amenity and Biodiversity.	This is noted and addressed in the Infrastructure Design Report by DOBA submitted with this application. The SUDS strategy has been designed in conjunction with the landscape architects to ensure the most appropriate strategy is delivered within this development.
CPO 14.14 Underground tanks and storage systems shall be permitted as a last resort only where it can be demonstrated the other more sustainable SuDS infrastructure measures are not feasible. In any case underground tanks and storage systems shall not be permitted under public open space, unless there is no other feasible alternative.	Other SuDs measures are used throughout the site including porous and permeable paving; bio retention systems and tree pits, and proprietary Surface Water Treatment Systems. Underground attenuation tanks are provided in line with this policy where all other alternatives have been exhausted.
CPO 14.15 To promote the use of green infrastructure, such as swales and wetlands, where feasible as landscape features in new development to provide storm / surface runoff storage and reduce pollutants, as well as habitat, recreation and aesthetic functions.	

Appendix 1 of the 2022-2028 Development Plan sets out the Development and Design Standards for new residential developments. The most relevant to the site are listed below.

Policy/Objective	Evaluation of Consistency
Section 2 - Infrastructure & Services	
<p>2.1.1 Enhancing Sustainable Accessibility</p> <p><i>New significant residential or mixed use development proposals shall be required to be accompanied by a 'Accessibility Report' that demonstrates that new residents / occupants / employees (including children and those with special mobility needs) will be able to safely access through means other than the private car:</i></p> <p style="padding-left: 40px;"><i>(a) local services including shops, schools, health care and recreational facilities, and</i></p> <p style="padding-left: 40px;"><i>(b) public transport services.</i></p> <p><i>Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity/quality of existing or planned linkages.</i></p>	<p>The TTA by Systra contains a Mobility Management Plan which demonstrates the accessibility of this site for cyclists and pedestrians to existing services in the area and public transport.</p>
<p>2.1.2 Public Transport</p> <p>Bus network</p> <ul style="list-style-type: none"> New and improved roads shall generally be designed and include infrastructure for bus use (whether or not bus services are currently available at that location) unless otherwise advised by the Road Authority; 	<p>While the proposed development does not include specific bus infrastructure the proposed road network is designed to allow for future bus use to be accommodated in line with aims to promote a modal shift from private car to sustainable forms of transport.</p>
<p>2.1.4 Public Roads</p> <p>Local road development control objectives (general) 1. The design of new local roads or improvements to existing local roads and new means of access onto local roads shall generally comply with the guidance set out in the "Design Manual for Urban Roads and Streets", "Traffic Management Guidelines" and "Recommendations for Site Development Works for Housing Areas" as appropriate.</p>	<p>Please see DMURS Statement of Consistency prepared by Donnachadh O'Brien & Associates Consulting Engineers submitted as part of this application.</p>

<p>2.1.5 Pedestrian & cycling facilities</p> <ul style="list-style-type: none">• New pedestrian and cycle paths shall be designed in accordance with the standards set out in the Traffic Management Guidelines and the National Cycle Manual and shall ensure ease of connectivity to the surrounding area;• Footpaths shall be provided on all new local roads to allow for full permeability of residential districts by pedestrians. All footpaths shall be designed to accommodate those with mobility difficulties or who are wheelchair bound;• Street lighting along foot and cycle paths shall be provided in accordance with the recommendations made in Wicklow County Council Guidelines for Public Lighting Works 2017 as well as EN standards) as may be revised or replaced.							
<p>2.1.7 Car parking</p> <p>New / expanded developments shall be accompanied by appropriate car parking provision, including provision for electric vehicle charging points (as set out in Table 2.2)</p>	<p>This proposal is accompanied by a Traffic Impact Statement which confirms there is sufficient car parking, with 1,185 spaces, for the residential development in line with Wicklow County Council standards. The scheme has been designed to the highest residential standard. All units accord with the quantitative and qualitative standards sets out in the National Apartment Guidelines and the WCC County Development Plan.</p>						
<p>2.1.8 Bicycle parking</p> <ul style="list-style-type: none">• The Planning Authority will require the provision of a minimum level of covered bicycle parking facilities in association with new developments• In residential developments without private gardens or wholly dependent on balconies for private open space, covered and lockable bicycle stands should be provided in private communal areas;• The bicycle parking standards set out in Table 2.4 shall apply. <table><tr><th>Type of Development</th><th>Cycle Standard</th><th>Parking</th></tr><tr><td>Residential units</td><td>1 space per bedroom + 1 visitor space per 5 units</td><td></td></tr></table>	Type of Development	Cycle Standard	Parking	Residential units	1 space per bedroom + 1 visitor space per 5 units		<p>Cycle parking spaces have been provided at the site in line with the WCC Development Plan 2022-2028.</p>
Type of Development	Cycle Standard	Parking					
Residential units	1 space per bedroom + 1 visitor space per 5 units						
<p>2.2.1 Water supply</p> <p>(a) Mains water connections Design standards and specifications for connections to mains water are a matter for Irish Water. However, full details of the proposed / existing water main layout to</p>	<p>Please refer to engineering pack prepared by Donnachadh O’Brien & Associates Consulting Engineers submitted as part of this application</p>						

<p>which it is proposed to connect shall be provided at application stage.</p>					
<p>2.2.4 Surface & storm water systems all new developments shall be designed to:</p> <ul style="list-style-type: none"> • Ensure the separation of foul and surface water discharges through the provision of separate networks; • Surface water is appropriately collected on site to prevent flow onto the public roadway, adjoining properties or into the public foul sewer / sewage treatment plant; • Ensure the implementation of Sustainable Urban Drainage Systems (SUDS) in accordance with the Wicklow County Council SuDS Policy to ensure surface water runoff is managed for maximum benefit. 	<p>Please refer to engineering pack prepared by Donnachadh O'Brien & Associates Consulting Engineers submitted as part of this application</p>				
<p>2.3 Waste 2.3.1 Residential developments</p> <ul style="list-style-type: none"> - The design and layout of all individual and multi house developments shall provide for on- site waste storage (including recyclables) and composting facilities; - For traditional housing layouts, this will normally require the inclusion of sufficient space to the side or rear of a dwelling for the storage of waste, including up to 4 wheelie bins. - For terraced houses (i.e. those units with no side laneways/gardens) wheelie bin enclosures may be provided to the front of houses, 	<p>The duplex apartments/ apartments units are served by communal bin and bike stores. They are located where they do not impact residential amenity. The external stores are in semi-private areas and are discreetly located. All end-of-terraced and semi-detached houses feature a secure rear garden gate for convenient bin storage. Terraced houses, on the other hand, will have bin enclosures seamlessly integrated into their front garden areas.</p>				
<p>Section 3 - Mixed Use & Housing Developments</p>					
<p>3.1.1 Intensity of Development (Density) <i>Table 3.1 Density Standards</i></p> <table border="1"> <thead> <tr> <th>Location</th><th>Density Standards</th></tr> </thead> <tbody> <tr> <td>Large Towns¹¹ (Bray, Greystones-Delgany, Arklow, Wicklow-Rathnew and Blessington)</td><td> <ul style="list-style-type: none"> ▪ Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station. ▪ Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare. ▪ Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares. </td></tr> </tbody> </table>	Location	Density Standards	Large Towns¹¹ (Bray, Greystones-Delgany, Arklow, Wicklow-Rathnew and Blessington)	<ul style="list-style-type: none"> ▪ Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station. ▪ Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare. ▪ Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares. 	<p>The development will have a net density of c. 35.2 units per ha which is suitable for the location of this site.</p>
Location	Density Standards				
Large Towns¹¹ (Bray, Greystones-Delgany, Arklow, Wicklow-Rathnew and Blessington)	<ul style="list-style-type: none"> ▪ Public Transport Corridors: Minimum density of 50 units per hectare within 500m walking distance of bus stop or 1km of light rail stop or rail station. ▪ Outer Suburban / Greenfield Sites: Minimum density of 35 - 50 dwellings per hectare. ▪ Development at net densities less than 30 dwellings per hectare should generally be discouraged particularly on sites in excess of 0.5 hectares. 				
<p>3.1.2 Building Height <i>Building height shall be assessed having regard to the building's function, location, setting and whether it can be successfully integrated into the existing streetscape without being unduly overbearing, obtrusive or impacting adversely on existing amenities.</i></p>	<p>The site is comprised of 2 and up to 5 storey buildings. The low rise heights of buildings is suitable for the greenfield location, adjacent to an existing 2 storey dominated residential estate. The proposed low rise heights compliment the surrounding public and communal open spaces will not overshadow</p>				

	them but will offer sufficient passive surveillance.						
<p>3.1.3 Privacy</p> <ul style="list-style-type: none"> <i>Residential developments shall be so designed and constructed to ensure maximum privacy for residents</i> <i>Windows and balconies shall be positioned and designed such that direct intrusion into private living areas from other dwelling units or from the public realm is avoided.</i> <i>A separation of 22m will normally be required above ground level between opposing windows serving private living areas (particularly bedrooms and living rooms). However, this rule shall be applied flexibly</i> <i>The degree of 'overlooking' afforded by different window types shall be considered appropriately</i> <i>standards will be applied for boundary walls (see section 3.1.3 for further details)</i> 	<p>Privacy has been greatly considered throughout the housing design.</p> <p>Every house has a private rear garden, while all duplexes/ apartments have large private terraces to the rear that overlooks communal open space. At ground floor, the terraces will have a low railing/hedge to offer them sufficient levels of privacy and to separate their property from the common areas.</p> <p>Appropriate separation distances of 22m and over have been implemented across the site to avoid overlooking of dwelling windows.</p>						
<p>3.1.4 Open Space</p> <p><i>Dwellings shall generally be provided with private open space at the following minimum rates:</i></p> <table border="1"> <thead> <tr> <th>House size</th><th>Minimum private open space</th></tr> </thead> <tbody> <tr> <td>1-2 bedrooms</td><td>50sqm</td></tr> <tr> <td>3+ bedrooms</td><td>60-75sqm</td></tr> </tbody> </table> <p><i>Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made</i></p>	House size	Minimum private open space	1-2 bedrooms	50sqm	3+ bedrooms	60-75sqm	<p>All houses and duplex units are provided with private open space in line with or exceeding the standards set out in section 3.1.4 of Appendix 1 of the Development Plan.</p> <p>The proposed development includes Public and Communal Open space throughout the development in line with these requirements.</p>
House size	Minimum private open space						
1-2 bedrooms	50sqm						
3+ bedrooms	60-75sqm						
<p>3.1.5 Car Parking</p> <p><i>2 off street car parking spaces shall normally be required for all dwelling units over 2 bedrooms in size. For every 5 residential units provided with only 1 space, 1 visitor space shall be provided. Parking for non-residential uses shall be provided in accordance with the standards set out in Table 2.3 except where a deviation from the standard has been justified.</i></p> <p><i>Table 2.3 reads as follows:</i></p> <table border="1"> <tbody> <tr> <td>Dwelling 1-2 bedrooms</td><td>1.2 per unit⁸</td></tr> <tr> <td>Dwelling 3-4 Bedrooms</td><td>2 per unit</td></tr> </tbody> </table> <p><i>Table 2.2 relates to Car Charing Point Provision</i></p>	Dwelling 1-2 bedrooms	1.2 per unit ⁸	Dwelling 3-4 Bedrooms	2 per unit	<p>The development will provide a total of 1,185 no. spaces. Breakdown is as follows:</p> <p>948 no. in curtilage residential spaces 178 no. Off curtilage residential spaces 59 no. Space for the local centre</p>		
Dwelling 1-2 bedrooms	1.2 per unit ⁸						
Dwelling 3-4 Bedrooms	2 per unit						

New (single-unit residential) buildings	New 'own door' dwelling with car parking space located within the property boundary.	Installation of external recharging point for electric vehicles in each dwelling.	
New (single-unit residential) buildings	New 'own door' dwelling served by shared car parking areas or car parking spaces not within the dwelling site boundaries.	Installation of 1 recharging point for every 10 dwellings (with a minimum 1 for development under 10 dwellings) which is available to all residents. Installation of ducting infrastructure for every parking space within development.	
3.1.12 Taking in Charge <i>New developments shall be taken in charge in accordance with the adopted 'Taking in Charge Policy' of Wicklow County Planning Authority as may be varied over the life of the plan.</i>			All roads and public open space is proposed for taking in charge.
3.2.4 Greenfield Developments <i>New developments on greenfield sites may need to establish their own identity, as some may be of such a scale and distance from the core town centre area as to render analysis of existing 'context' meaningless. In this regard, it is considered appropriate to consider two forms of greenfield development – the large-scale planned expansion area and small to medium scaled housing developments.</i>			<p>The proposed development shall be considered a large scale housing development.</p> <p>The proposed development will establish its own identity with 4 different character areas clearly creating a defined and legible new community.</p>
3.2.6 Accessibility <i>At edge of centre or greenfield locations, good connectivity to the town centre area will be required and where access roads or pedestrian / cycle links do not exist, these will be required to be provided or financed by the developer.</i> <i>New developments will be required to place a high emphasis on permeability and legibility of access routes. A permeable layout is one that is well connected and offers a choice of direct routes to all local destinations, thereby encouraging walking and cycling, facilitating public transport penetration and generating higher levels of pedestrian activity, casual social interaction, informal supervision and thus security. A legible development is one that is structured in a way that creates distinctive places and spaces that may be easily 'read' and that are easy to find one's way around. A legible layout is based on designing at a human scale in response to the positive features of a site and how it relates to the wider area, rather than technical demands of traffic or the internal logic of the individual site.</i>			<p>The proposed development on this greenfield site presents an opportunity for establishing clear and accessible links to the town of Arklow itself. The incorporation of a planned roadway network complements the design's structural elements. These streets not only make the development more accessible and permeable now, but they also set the stage for future connectedness, ensuring that it continues to be a useful and crucial component of the larger urban fabric.</p>

<p>3.2.7 Design Quality</p> <p><i>Greenfield developments shall be so laid out as to maximise retention and integration of natural features, such as mature trees, hedgerows, water courses etc into the site layout and which shall be adequately protected during construction phases in a manner agreed with the planning authority;</i></p> <p><i>The maximum size of any greenfield housing development will depend on the size of the town and the requirements of the town plan / local area plan, but shall not be greater than 100 units where only traditional houses are proposed or 200 units where there is a mix of houses and apartments. Any development exceeding this number shall be broken up into a number of distinct 'estates', even if accessed from a shared road, with materially different architectural styles.</i></p>	<p>The proposed development responds to the site constraints present including the marsh area and pNHA which is to be protected and sloping site north to south.</p> <p>A Tree Survey has been carried out by Tree Management Services which has identified a number of mature trees and hedgerows on the southern and eastern boundaries.</p> <p>Proposals will seek to retain as many existing trees and hedgerows as possible, and will also make the effort to enhance the existing hedgerows by filling in where required and protecting the existing ditch on the eastern boundary. The natural character of the marsh on the southwestern will be retained and incorporated into the proposed residential landscape.</p> <p>Please refer to site plans prepared by BKD, CCK and Hogan Architects and landscape masterplan prepared by NMP Landscape Architects for further detail on retention and proposed trees and hedgerows.</p>
Section 7 - Social Community Developments	
<p>7.2 Childcare</p> <p><i>Where a large development (or a development in conjunction with other developments in an Action Plan area) comprises more than 75 units, a single large childcare facility capable of serving all proposed units (and future units) may be permissible, subject to a ceiling of 100 places (full and part time)</i></p>	<p>This proposed development will include a creche at the proposed local centre.</p>
Section 10 - Retail	
<p>CPO 10.24 To facilitate the provision of local retail units in residential areas where there is a clear deficiency of retail provision, subject to protecting residential amenity.</p>	<p>Three retail units are proposed within the local centre to meet the local needs generated by the proposed development.</p>
Section 8 - Open Space	
<p>8.5 Residential Public Open Space</p> <p><i>Public open space will normally be required at a rate of 15% of the site area – areas within the site that are not suitable for development or for recreational use must be excluded before the calculation is made</i></p> <p><i>In greenfield developments, subject to the size of the site, a hierarchy of open spaces shall be provided to provide for the different play needs of</i></p>	<p>The proposed development includes 3.352ha (17.7%) of Public Open Space. This is in accordance with this policy.</p> <p>In addition, within phase 2, additional open space will be provided in the form of sports fields.</p>

different age groups. In this regard, all developments shall aim to include:

- *At least one, flat space with dimensions on not less than 20m x 40m, suitable for ball games (trees should only be planted around the perimeter)*
- *A number of smaller spaces immediately adjacent to dwellings, with interesting contours and natural features, suitable for play activities of younger children*

In larger developments (in excess of 1ha), consideration should be given to dedicating part of the residential open space (not exceeding 25% of the total space) to community gardens; at a minimum, landscaping plans will be required to identify a suitable area (in terms of soil type, gradient, light, drainage etc) within the residential open space area that would be suitable for future community garden use by the resident community

8.6 Private Open Spaces – Gardens, Terraces, Balconies

Dwellings shall generally be provided with private open space at the following minimum rates, unless otherwise specified by the Planning Authority:

House size	Minimum private open space
1-2 bedrooms	50sqm
3+ bedrooms	60-75sqm

Own door duplexes shall generally be provided with open space at the following minimum rates:

House size	Minimum private open space
1 bedroom	10sqm
2/3/4 bedrooms	10sqm for the first bedroom and 5 sqm per additional bedroom

It will be expected that private open space provided will exceed these standards whenever possible and such minimum standards will only be acceptable for up to 50% of the units in any development.

Every house has a rear, private and usable garden that meets and often exceeds Development Plan standards.

Duplexes/ apartments have large private terraces to the rear that overlooks communal open space.

ARKLOW AND ENVIRONS LOCAL AREA PLAN 2018-2025

The Arklow and Environs Local Area Plan 2018-2024 was adopted by Wicklow County Council on the 5th of February 2018.

The Arklow and Environs LAP has an objective to increase densities on existing zoned land where appropriate and to zone additional land for housing based on the principles of: applying a sequential approach whereby zoning is extended from the centre, contiguous to existing settlement, promoting the concept of 'walkable' neighbourhoods, promotion of sustainable land use and transportation pattern, lands easily serviced by a gravity fed water supply system, providing upmost protection to the environment and heritage and the promotion of the development of lands adjacent to existing planning communities and social infrastructure.

The current Arklow LAP has a housing target of c.5,700 additional units between 2016 and 2028, which is a 100% increase on the current number of units in the town. 3,200 of these units (56% of the total) are identified within the 4 no. Action Area Plan locations designated at the outskirts of the town north and south. The remaining 44% are to be provided through a combination of brownfield, town centre, infill, waterfront and small opportunity sites.

DEVELOPMENT STRATEGY

The LAP outlines a Residential Development Strategy for the Town which seeks to:

- *To adhere to the objectives of the Wicklow County Development Plan in regard to population and housing as are applicable to Arklow.*
- *To ensure sufficient zoned lands are available at appropriate locations capable of meeting the housing needs of the projected population of the settlement area over the plan period in a sustainable manner. Notwithstanding the zoning of land for residential purposes, the Planning Authority shall monitor and implement the population targets as set out in the County Development Plan and shall phase and restrict, where necessary, the granting of residential planning permissions to ensure these targets are not exceeded.*
- *To promote and facilitate in-fill housing developments, the use of under-utilised / vacant sites and vacant upper floors for residential use and facilitate higher residential densities at appropriate locations, subject to a high standard of design, layout and finish.*
- *To promote and facilitate the redevelopment of sites in the town centre zoning, including the identified opportunity sites, where development will positively contribute to the commercial and residential vitality of the town centre.*
- *To promote and facilitate the in-depth development of the waterfront zone, for mixed-use development with a high concentration of residential use subject to a high standard of design, layout and finish.*

Residential Development Objective H4 of the LAP states that: *"the development of zoned land should generally be phased in accordance with the sequential approach as set out in the County Development Plan. The Council reserves the right to refuse permission for any development that is not consistent with these principles."*

Objective H5 states that: *"Housing development shall be managed and phased to ensure that infrastructure and in particular, community infrastructure, is provided to match the need of new*

residents. Where specified by the Planning Authority, new significant residential or mixed use development proposals, may be required to provide a social and community facility/facilities as part of the proposed development or the developer may be required to carry out a social infrastructure audit, to determine if social and community facilities in the area are sufficient to provide for the needs of the future residents. Where deficiencies are identified, proposals will be required to either rectify the deficiency, or suitably restrict or phase the development in accordance with the capacity of existing or planned services.”

Based on the Core Strategy of the previous Wicklow County Development Plan (2016-2022) the 2018 LAP zoned sufficient land to provision of up to c.5,638 additional units as per Table 3.1 below:

LOCATION/DESCRIPTION	AREA (HA)	ZONING	POTENTIAL NO. OF UNITS
Action Area Plan 1 Tinahask Upper- Abbeylands	22.7	MU (R28)	600
Action Area Plan 2 Tinahask Upper- Money Little and Money Big	26.6	MU (R28+LSS)	750
	6.75	MU (R20)	135
Action Area Plan 3 Kilbride	50	MU (R28 + LSS)	1,500
Action Area Plan 4 Coolboy	22	MU (R Special)	220
Coolboy (east of M11)	3.46	R10	34
Money Little (west of Wexford Road)	2.5	R20	50
Yellow Lane	0.7	R28	19
New Residential infill sites		R28	900
The Alps Opportunity Site		TC	160
Main Street Opportunity Site		TC	70
Waterfront Zone North		WZ	300
Waterfront Zone South		WZ	500
Town centre infill		TC	150
Existing residential infill		RE	250
TOTAL Potential new housing			5,638⁹

Table 3.1 Residential zoning provisions

Table 6 LAP Development Areas

RESIDENTIAL PHASING

Appendix D of the LAP sets out a Phasing and Implementation Strategy for Residential zoned land in Arklow. The Strategy is based on the following spatial development principles:

- Application of the ‘sequential approach’ whereby zoning extends outwards from the town centre, contiguous to the existing built up part of the settlement;
- promotion of the concept of ‘walkable’ neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized;
- promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of the train station or 500m of bus routes will be prioritized;
- lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized;
- cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;
- promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones.

The development of zoned / designated land should generally be phased in accordance with the sequential approach:

- *Development shall extend outwards from the town centre with undeveloped land closest to the centre and public transport routes being given preference, i.e. 'leapfrogging' to peripheral areas shall be resisted;*
- *a strong emphasis shall be placed on encouraging infill opportunities and better use of underutilised lands; and*
- *areas to be developed shall be contiguous to existing developed areas.*

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal.

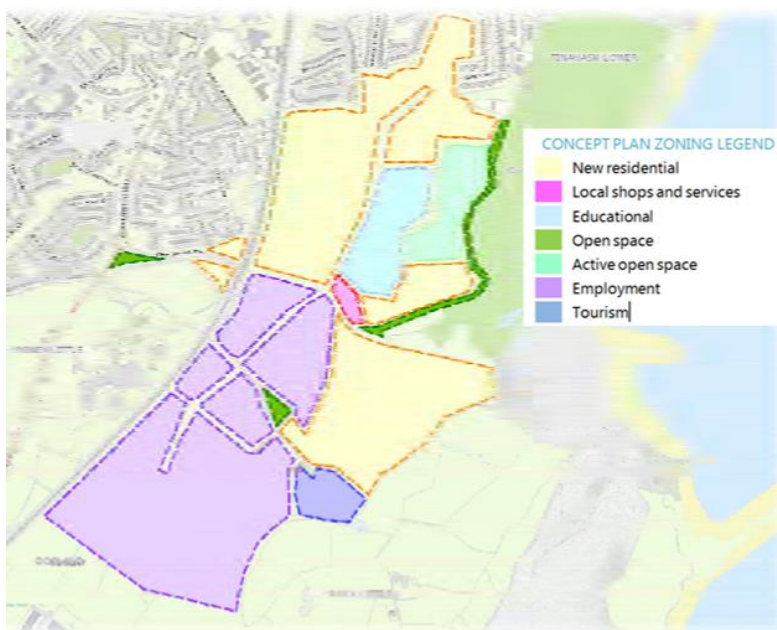
Based on the above principles the LAP designates 3 priority areas within 4 Action Area Plans for residential development set out below:

- **Priority 1 - town centre, infill and waterfront**
Based on LAP Table 3.1 these zoned sites would account for c.40% (c.2,350 units) of the total potential new housing in the LAP.
- **Priority 2 – Action Area Plan 1&2, and greenfield housing lands to the west of the town at Lamberton, Ballyraine, Knockenrahan**
Based on Table 3.1 these zoned lands would account for c.30% of the total potential new housing.
- **Priority 3 – Action Area Plan 3 (Kilbride), Action Area Plan 4, and other greenfield lands north of the river.**
Based on Table 3.1 the AAP Kilbride lands would account for c.25% of the total potential new housing.
The AAP4 and other outer greenfield zoned lands would account for c.5%.

Objective H8 states that the 4 AAP lands shall be “*developed as comprehensive (not piecemeal) integrated schemes that allow for the sustainable phased and managed development of each action plan during the plan period.*”

Once an overall Action Area Plan (AAP) has been agreed in writing with the planning authority then separate applications for sections of each AAP can be progressed.

The Action Area Plan 1 and 2 lands, which are given the highest priority for development of the greenfield lands in the LAP, are located south-east of the town at Abbeylands and Tinahesk and extend to c.94ha. Please refer to Map 11.2 below taken from the LAP.



Map 11.2 Concept plan of AAP1, AAP2 and zoned lands to the at Money Big/Bogland

Figure 53 AAP1 and AAP2 lands

SPATIAL DEVELOPMENT STRATEGY & JUSTIFICATION FOR AAP3 KILBRIDE LANDS

The AAP3 lands at Kilbride are subject to an overall Masterplan for the lands prepared in 2019 by a team of architects including BKD Architects, Arthur Gibney & Partners, Taylor McCarney Architects, and Conroy Crowe Kelly Architects.



Figure 54 AAP3 Lands Masterplan 2019

In tandem with the Masterplan, an Action Area Plan for the overall landholding has been prepared and formally agreed with Wicklow County Council.

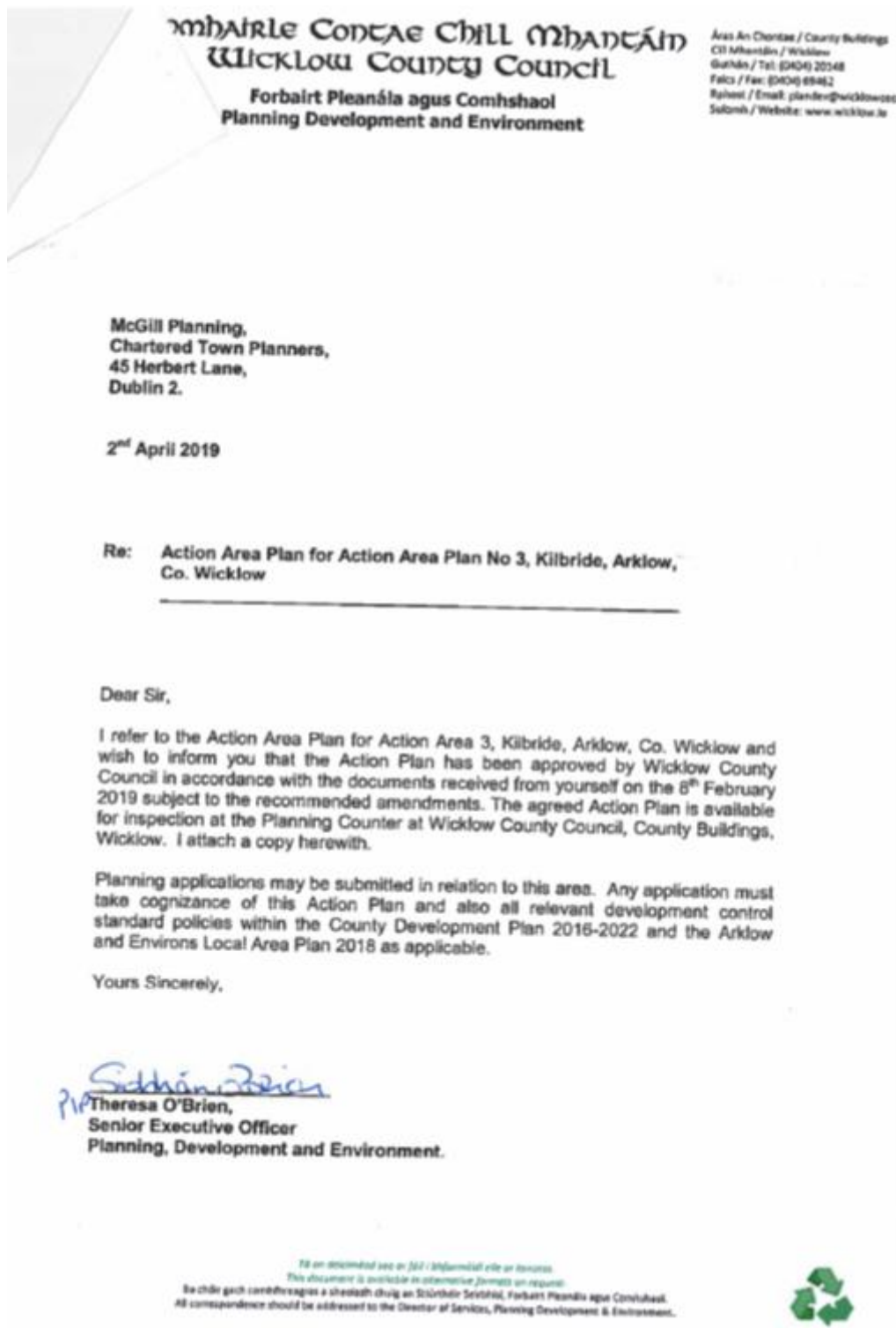


Figure 55 WCC AAP3 Masterplan Confirmation

Both the Masterplan and AAP were prepared for the Kilbride Lands to facilitate a then planned Strategic Housing Development (SHD) planning application for the lands. The SHD application was subsequently put on hold pending the granting of permission for the Arklow Wastewater Treatment

Plant upgrade, which is currently under construction with a planned completion/operation date of 2025.

In the meantime, a new school campus has been granted permission within the Kilbride Masterplan lands by the Department of Education (Ref. 22/213) and which will comprise a 2-storey, 16 classroom primary school and a 3-storey post primary school for 400 students.

It is now considered that a first phase residential development can be progressed on the Kilbride lands, with the WWTP upgrade close to completion and a new school campus to be developed immediately to the north, and can also be justified having regard to the Spatial Development Strategy criteria of the LAP as follows:

Principle	Statement of consistency
<i>Application of the 'sequential approach' whereby zoning extends outwards from the town centre, contiguous to the existing built up part of the settlement;</i>	<p>This proposed first phase, Character Area A, immediately abuts the permitted development 23/756 which is adjacent to the existing built up area of Arklow with Willow Grove, Avondale Crescent and Murell Drive to the east. The proposed development, the subject of this application, will follow on sequentially from this permission.</p> <p>Please see the phasing plan to indicate the sequence of development.</p> <p>The proposed development also includes for a new public pedestrian and cyclist route to the south across the Avoca River. This is in addition to the permitted route through the adjoining WCC lands to the east and connecting with the public network in the Avondale estate and to the Dublin Road.</p> <p>This new connection (with 4m walkway/cycleway, fully landscaped and with public lighting) will provide future residents with a direct and safe route to the Main Street and the associated amenities.</p> <p>This area is immediately adjacent to and contiguous with the existing built up area of Arklow and will enable the extension out from the town centre in line with this principle.</p>
<i>Promotion of the concept of 'walkable' neighbourhoods, whereby undeveloped lands within 10 minutes walking distance of the settlement centre and 5 minutes walking distance of any neighbourhood / village centres are prioritized;</i>	<p>This area provides a 'walkable' neighbourhood, within 10 minutes walking distance of the zoned town centre north of the river, achieved as part of the new boardwalk and bridge proposed.</p> <p>It will also provide a new shorter, safer route for pedestrians and cyclists to the new permitted</p>

	<p>primary and post primary schools under WCC reg ref 22/213.</p> <p>The site is within 15 minutes' walk of the Bridgewater Centre. It is immediately adjacent to the Marshlands Sports Centre and is within 10 minutes' walk of the existing primary school, the new primary and post primary schools and existing local centre on the Dublin Road.</p>
<i>Promotion of a sustainable land use and transportation pattern, whereby undeveloped lands that are accessible to public transport routes are considered most suitable for development. In this regard, undeveloped land within 1 km of the train station or 500m of bus routes will be prioritized;</i>	<p>This site promotes a sustainable land use and transportation pattern as it is within short walking distance of the Bus Eireann routes which operate along the R772 Dublin Road.</p> <p>It is also within c.30 minutes' walk, or under 10 minute cycle to Arklow Train Station.</p>
<i>lands already or easily serviced by a gravity fed water supply system and waste water collection system will be prioritized;</i>	<p>It will be necessary for the applicant to sign a Major Connection Agreement with Irish Water to connect to the public foul sewer network and to supply potable water to the development site.</p> <p><u>Waste Water</u></p> <p>As noted above the Arklow WWTP is now operational. It is proposed that the new development will connect up to the new WWTP.</p> <p>The applicant has already paid a substantial sum to Irish Water to ascertain the preferred route to connect the development to the Arklow WWTP.</p> <p>The preferred route has now been established and these works will include an upgrade of the existing public sewer on the Dublin Road and the Ferrybank Road. Significant upfront investment will be required from the applicant to cover the considerable cost of these works.</p> <p>The upgrade of these public networks will increase their available capacities providing significant benefits to the public for future connections in the area.</p> <p><u>Water Supply</u></p> <p>Significant upgrade works will be required to the existing watermain network along the Dublin Road to provide potable water supply to the development. As above the considerable cost of these works will be borne by the applicant as a significant upfront investment.</p>

	<p>These works will increase the available capacity of the public watermain network providing significant benefits to the public for future connections in the area.</p>
<p><i>cognisance will be taken of the need to provide upmost protection to the environment and heritage, particularly of designated sites, features and buildings;</i></p>	<p>This application site is located at a remove from cultural heritage or protected structures in the wider vicinity and as such it will not impact on any buildings or structures of merit.</p> <p>To the northwest of the site, is the Howard Mausoleum Pyramid, and the associated graveyard. This pyramid has been maintained over the years. The proposed application will not impact on this national monument.</p> <p>In terms of natural heritage, it is noted that the lands are adjacent to the Arklow Marsh an pNHA.</p> <p>Altamar Ecologists have carried out surveys on the flora and fauna associated with this site and also provided advice on the best development approach to the site to ensure the protection of same.</p> <p>Please see the AA screening, CEMP and EIAR submitted with this application which includes mitigation measures to protect the environment of this site.</p>
<p><i>promotion of the development of lands adjacent to existing or planned community and social infrastructure, such as schools and open space sites/zones</i></p>	<p>The application site is located close to a planned new primary and post primary school campus recently granted on the Masterplan lands to the north and which would be directly accessible for future residents.</p> <p>The phase 1 application also includes provision of a large public open space which will be directly accessible to existing residents in adjoining estate via the new public footpath/cycleway planned as part of the development.</p> <p>This new, south facing park will overlook and provide unobstructed views of Arklow Marsh and Arklow town centre and local landmarks including Saint Saviour's Church and St. Mary's & Peter's Church.</p>

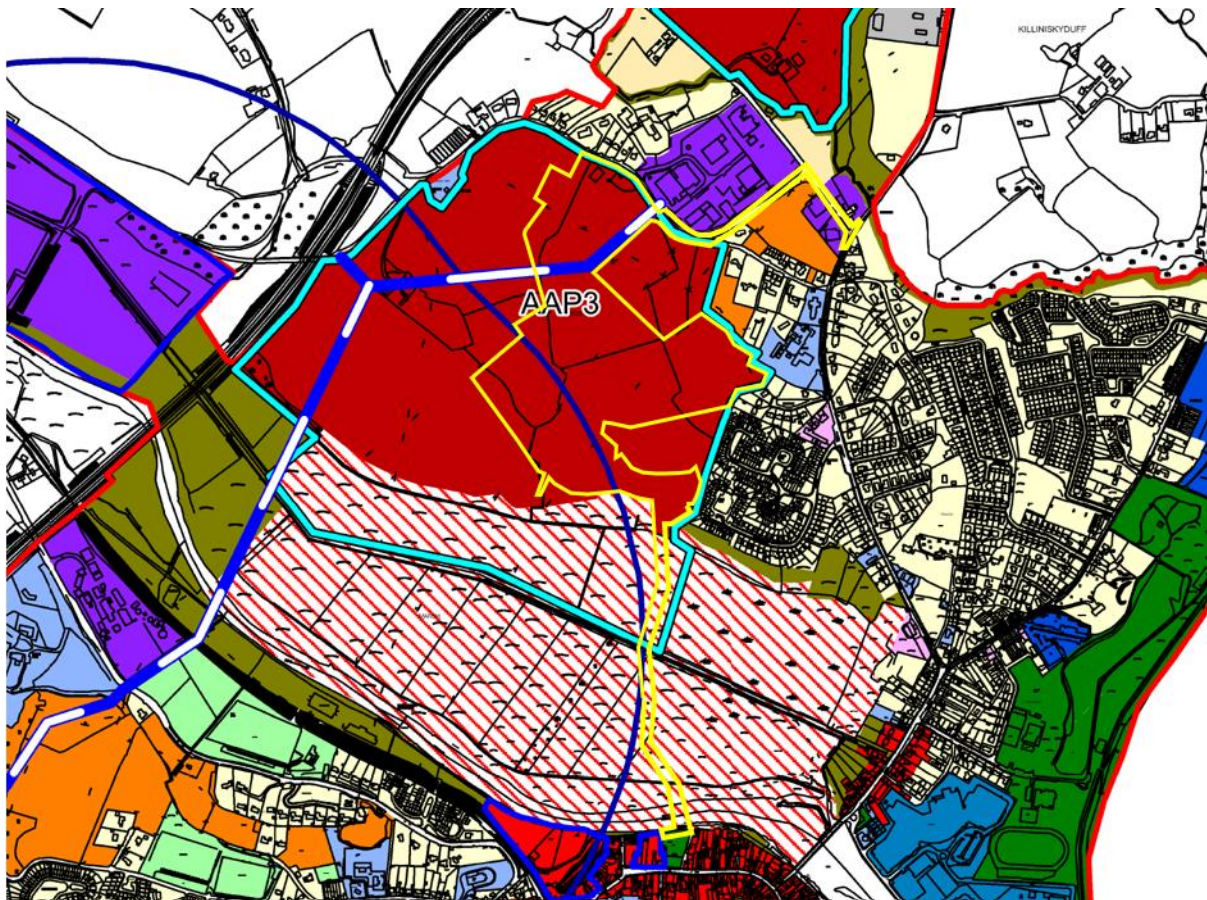


Figure 56 LAP Site Zoning with subject site outlined in yellow.

The subject lands are designated Action Area Plan 3 (AAP3) – Kilbride Lands. The majority of the AAP3 lands are subject to a single zoning – “MU: Mixed Use” with the objective “To provide for mixed use development.”

Kilbride (AAP3) is identified as the location of major development in Arklow; the growth of the settlement in accordance with regional plan targets is contingent on the delivery of the major residential, employment and community services development at this location. Along with Tinahask (AAP1 and AAP2), these two areas have been identified as the most suitable lands in the environs of Arklow for large scale development. However, since the inception of the Area Action Plan this is the only site to be promoted and to come forward for development. As a central site, close to the Bridgewater centre and the town centre it is considered appropriate that this site be delivered in advance of the other two sites.

The area to the south will also deliver a new bridge across the marsh, connecting the site to the Main Street in Arklow. The marsh lands are zoned Arklow Town Marsh pNHA. As set out in the LAP Chapter 10 “The marsh is the principal wetland habitat in the area, providing an important flood control role and supporting a variety of plant and animal life, in particular reed species and bird life.” Relevant Heritage Objectives relating to this zoning are:

- HT1 which aims “To maintain the favourable conservation status of all proposed and future Natural Heritage Areas (NHAs) in the plan area in particular the Arklow Marsh and to support environmentally sensitive measures to enhance the understanding and enjoyment of such natural areas.”

- HT3 which aims to *“Protect and enhance the character, setting and environmental quality of natural, architectural and archaeological heritage, and in particular those features of the natural landscape and built structures that contribute to its special interest. The natural, architectural and archaeological heritage of the area shall be protected in accordance with the objectives set out in the Wicklow County Development Plan”*
- HT8 which aims to *“To facilitate the development and enhancement of green infrastructure resources, including access to, connectivity between areas of interest and linkages between green spaces including the coast, where feasible within Arklow and environs settlement boundary (see Map No. 10.1).”*
- HT9 which aims to *“To maintain the conservation value of all proposed and future Natural Heritage Areas (NHAs) and to protect other designated ecological sites in Arklow and Environs.”*

EVALUATION OF CONSISTENCY

In line with these policies, no proposed residential development is included within the zoned marsh land or pNHA. The proposed Boardwalk will be resting on the permitted debris traps with a small area of in water works on the south side of the Avoca River to provide the connection to the south bank. The proposed development of the boardwalk across the marsh will be constructed in a sensitive manner ensuring minimum impact on the marsh. This proposal will enhance *“access to, connectivity between areas of interest and linkages between green spaces including the coast, where feasible within Arklow and environs settlement boundary (see Map No. 10.1).”*

This proposal is therefore considered to be fully compliant with these policies.

It is noted that the site is also within a Seveso 1000m zone. Therefore the relevant policy is ED7 which states as follows:

Policy ED7	Evaluation of consistency
<p>In relation to the Prevention of Major Accidents (Control of Major Accident Hazards Involving Dangerous Substances) legislation, it is an objective to:</p> <ul style="list-style-type: none"> • comply with the Seveso III Directive in reducing the risk and limiting the potential consequences of major industrial accidents; • where proposals are being considered for the following: <ul style="list-style-type: none"> (i) new establishments at risk of causing major accidents, (ii) the expansion of existing establishments designated under the Directive, and (iii) other developments proposed near to existing establishments; the Council will require that applicants must demonstrate that the following considerations are taken into account: <ul style="list-style-type: none"> (i) prevention of major accidents involving dangerous substances, (ii) public health and safeguarding of public health, and (iii) protection of the environment; 	<p>Noted. This is applicable to the subject sites.</p> <p>This site is not a risk for causing major accidents, nor is it a proposal to expand the existing site.</p>

<ul style="list-style-type: none"> • ensure that land use objectives must take account of the need to maintain appropriate distances between future major accident hazard establishments and residential areas, areas of substantial public use and areas of particular natural sensitivity or interest; and • have regard to the advice of the Health and Safety Authority when dealing with proposals relating to Seveso sites and land use plans in the vicinity of such sites. 	
Supporting Seveso Sites	
<p>The Major Accidents Directive (Seveso II) is an EU Directive that seeks to prevent major industrial accidents involving dangerous substances and to limit the consequences of such accidents on people and the environment. The Seveso Directive applies to one site in the plan area, the Sigma Aldrich facility on the Vale Road which has a consultation distance or radius of 1000m from its site boundaries. Advice and technical support will be sought from the Health and Safety Authority (HSA) and relevant legislation where applications are affected by the 1000m buffer.</p>	<p>This is noted and it is understood that WCC have previously consulted with the HSA in relation to the facility when adopting the zoning of lands within the HSA consultation area.</p>

The following specific criteria is set out for the AAP3 lands.

<p>Arklow & Environs LAP AAP3 Requirements:</p> <p><i>Vehicular access to the Action Area shall be provided from the L-6179 or from the Regional Road if it is possible, with the roads configuration of the development providing / facilitating a possible future third Avoca river crossing; other, secondary access routes from the adjacent road network shall also be provided as may be possible;</i></p> <p><i>A number of pedestrian access routes into the action area shall be provided where possible from adjacent developed areas;</i></p>	<p>EVALUATION OF CONSISTENCY</p> <p>The proposal incorporates the provision of the first section of the distributor road from the Kilbride Road L-6179 allowing access to the site from the north. In the future the distributor road could extend to the western end of Arklow town south of the Avoca River via a new bridge.</p> <p>This proposed development seeks to also provide a new pedestrian and cyclist connection to the south through the marsh, this is in addition to the permitted route to the east of the site, past the Marsh's Sports Complex, to Avondale Crescent, and through to Dublin Road. This will ensure appropriate connections not only for the future residents of the houses but also a safe and attractive route for the future pupils of the school complex.</p>
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A maximum of 1,500 residential units shall be provided, in a range of development formats, densities, unit sizes and designs;

To achieve a sense of place and allow for visual diversity any residential application should provide for a number of identifiable and distinct housing estates (not exceeding 200 units), each containing materially different house designs within an overall unified theme;

provision of a school campus (CE Community and Education Zone) on lands zoned CE to the north east of the AAP, subject to consultation and agreement with relevant stakeholders, including the Department of Education and Skills;

A local shops and services centre (LSS zone), of scale commensurate with the needs of the future population of the Action Area shall be provided, on a site of c. 1ha.

A minimum area of 12ha shall be developed as public open space, of which a minimum area of 4.5ha shall be laid for active sports uses (AOS zone); remaining open areas shall be laid out as informal parks and walks, and shall include a minimum of 2 equipped children's play areas;

The development shall be delivered in phases such that adequate road infrastructure and local services are provided for each phase; in particular, the road infrastructure to serve the action area plan and local shops & services sites shall be provided in Phase 1 accompanied by no more than 50% of the residential development; and the open space and strategic road infrastructure shall be provided no later than Phase 2 accompanied by no

The current proposal is for 666 unit within the first phase of the development in accordance with the LAP (see below). A second phase is proposed to come forward once permission has been achieved for this site. It provides for a wide range of housing types from 1, 2, and 3 bed duplex apartments, semi detached and terrace houses.

4 character areas have been defined. These have been designed by 3 different architects in order to ensure distinct housing estates.

The character area is defined by its architectural treatment, through careful selection of materials used on each of the building facades.

Planning permission has been granted for this school campus under WCC Reg Ref.22/213. This proposed development includes for a new road, with pedestrian and cyclist facilities, connecting to this school site. The proposed development will enhance the accessibility of the school for all.

As per the masterplan submitted as part of this application, a local services centre is included in the development which will deliver 3 no. Retail units, 3 no. Community/ healthcare units and a creche. This is centrally located within the overall AAP lands.

The proposed development provides 3.35ha of public open space. The parks and landscaped spaces throughout the plan are within easy walking distance of all residential units. This includes children's play areas. The 4.5ha of active sports will be delivered in phase 2 of the development.

The current proposal for represents the provision of 666 units, or the first phase, of the overall residential provision for the AAP. It will also provide the first section of the distributor road along with the open space provision. Further infrastructure will be delivered alongside later phases of the development.

more than 75% of the residential units (an additional 25% on top of Phase 1).

Any development proposals shall have regard to the setting and curtilage of structures and sites of heritage value, and habitats of biodiversity value and appropriate buffer zones-/mitigating measures shall be provided as required.

The current application proposal is not within the curtilage of the Arklow Pyramid protected structure. The future phases will include a suitable buffer around same.

Therefore, on the basis of the Local Area Plan and the AAP3 site specific objectives it is considered that this proposed development meets the criteria. It is also considered that there is justification for the bringing forward of this site ahead of AAP1 and in tandem with AAP2.

CONCLUSION

In conclusion, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with all relevant national, regional and local planning policies and guidelines. There is a clear and well publicised need for additional housing throughout Ireland and including Arklow. The delivery of housing on this site will support key policy objectives contained in the NPF and the RSES.

The design and layout of the proposal, which will deliver 666 no. residential units in the form of 1, 2, 3 and 4 bed houses, apartments and duplex apartments, is of high quality and makes the best use of available allocated land in line with best practice. It is a well-designed scheme that provides a sense of place and identity on this greenfield, zoned site.

It is considered that this proposal and layout will deliver a new residential community, local centre (with retail and community/ medical uses) and two storey creche around a series of pedestrian and cycle friendly parks and open spaces with good connectivity to Arklow Town through the delivery of a new boardwalk across the marsh. This will fit in with the existing surrounding community and provide benefits not only to the future residents but also to the existing community in Arklow. The proposal will also deliver the first phase of the new road from the Kilbride Road and is complementary to the permitted educational school campus which has been granted permission site.

The provision of new residential housing will meet an identified housing need for Arklow. These are high quality development made up of a range of housing types including semi detached and terraced housing along with duplex apartments/ apartments. All of which have ample rear gardens/ private open space, excellent internal layouts and car parking associated with each unit.

The proposal will also deliver c.3.35ha of public open space across the site, the equivalent of c. 17.7%, which is in excess of Development Plan requirements. These spaces are distributed across the site and provide a series of linked parks and playgrounds providing active and passive open space. All open spaces are overlooked and are a short walk from each dwelling. The boardwalk and new park to the south will also enable the marsh to be enjoyed without interfering in appropriate with this sensitive environment.

The proposed development will connect into the Uisce Eireann/ Irish Water network for all services including the Wastewater Treatment Plant which is now operational.

The proposal will deliver much needed housing within Arklow and can be delivered concurrently with the AAP2 permission on the opposite side of the town, if that permission is commenced. In order to meet the identified housing targets, set out in the Development Plan it is appropriate that this Kilbride site, adjacent to the existing residential areas, and within walking distance of Arklow Town, is brought forward for development.

The proposal for the residential and neighbourhood centre is on zoned land and is in line with the zonings set out in the County Development Plan, Local Area Plan and the Action Area Plan. The density is appropriate, and the design fits in well with the surrounding residential context.

The mix of uses within the neighbourhood centre is in line with planning policy and will provide existing and future residents with access to facilities appropriate to the location. The proposal is developed as

a comprehensive and integrated scheme that allows for the sustainable phased and managed development of each area during the plan period

We trust the above and enclosed documentation and information provides a reasonable basis to enable Wicklow County Council to review and grant planning permission for this proposed development. The proposed application has addressed as far as possible all feedback and Opinion Items received from Wicklow County Council. We trust that this planning application will be viewed positively in the delivery of sustainable development on suitably zoned, greenfield lands.

Appendix A – Wicklow Childcare Committee

From: Lorraine McConnell <lorraine@wccc.ie>
Sent: Thursday 3 April 2025 15:51
To: Cait Marley <Cait@mccplanning.ie>
Subject: Proposed crèche design for LRD at Kilbride, Arklow, Co. Wicklow.

Dear Cait

I hope this email finds you well. Just coming back to you re your previous emails. While Margot is the Development Officer for Arklow (margot@wccc.ie), I had the opportunity to look at this project.

On review of the plans, given the size of the property, the inclusion of a shared central space and/or a dining space would be beneficial to the children who will attend this service. I have attached the Universal Design Guidelines for your convenience. You will find recommendations on these types of spaces on page 128 onwards.

I also recommend the use of sliding walls between classrooms to offer flexibility on size and use depending on the operational requirements of potential service providers.

In terms of any comment from WCCC on the development, there is an ongoing need for childcare places (across all age groups and types of provision i.e. full part & sessional care) in this area.

<https://aim.gov.ie/app/uploads/2021/05/universal-design-guidelines-for-elc-settings-section-3-key-internal-and-external-spaces.pdf>

If you require any other assistance or should you review the plans having considered the guidelines and wish for further comment or advice please do not hesitate to contact me.

Kind regards

Lorraine McConnell

Development Officer

WICKLOW COUNTY CHILDCARE COMMITTEE

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Wicklow County Childcare Committee supports:

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