

12th November 2025,

Administrative Officer,
Planning Section,
Wicklow County Council,
Station Road,
Wicklow Town.

Re: Proposed Variation No. 5 to the Wicklow County Development Plan 2022-2028

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 5 (proposed Variation) to the Wicklow County Development Plan 2022-2028 (County Development Plan).

As Wicklow County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the Variation, the Office will consider whether the Variation has been made in a manner consistent with the recommendations of the Office and whether the Variation sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office welcomes the preparation of the proposed Variation and notes the overall approach of the Planning Authority to addressing the Revised National Planning Framework (2025) (NPF) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly in accordance with section 13 of the Act.

The proposed Variation comes at an opportune time to capitalise on the recent significant investment in the Arklow Wastewater Treatment Plant which was completed in 2025. The proposed Variation is therefore timely and significant in terms of supporting the growth and development of the town.

Arklow is identified as a Self-Sustaining Growth Town in the RSES and is identified for growth in residential, employment and service sectors, and as a growth centre which should become more economically self-sustaining and a key focus for economic growth in County Wicklow. The Office recognises the strong focus of the Economic Development and Employment Strategy of the proposed Variation which targets a growth in the jobs ratio from 70% to 105% for Arklow by 2031, with a wide range of employment objectives including development of brownfield sites (Waterfront Zones) and ample greenfield zoning with the acknowledgement of potential for development of the renewable energy sector and notes objectives ARK 27, ARK 28 and ARK 29, in this regard.

The Office welcomes the focused Specific Local Objectives (SLO) 1-2 for waterfront regeneration sites to support mixed use, high density residential, commercial, leisure, and public realm improvements, and SLO 3-5 for new residential neighbourhoods to be phased in line with infrastructure delivery with distinct residential areas and integrated open space.

The Office also welcomes the identification of two significant opportunity sites for town centre regeneration namely 'The Alps' site and 'Main Street' site.

The focused tourism policy objectives including the support of the future development of the proposed Arklow to Shillelagh Greenway and the range of objectives to improve the tourism product in Arklow including maximising the town's coastal location is also supported.

In relation to housing delivery, the recently published NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements) require planning authorities to vary their development plans to reflect the housing growth requirements set out in the appendix 1 to these guidelines, and to provide for additional provision in terms of residential zoned land. The Office understands that a process to implement these guidelines is currently being undertaken by the Planning Authority, and the Office acknowledges the challenges involved in co-ordinating the Variation process to provide an overall strategy for the development of Arklow with the separate forthcoming Variation to apply the guidelines.

Given these changes to the policy context, however, the Office has made a recommendation in relation to the Residential Phase 2 lands particularly where these lands are serviced/serviceable and well-located in terms of the services and amenities of the town (including the train station).

In relation to sustainable transport and mobility which will be important in terms of reducing greenhouse gas emissions and delivering sustainable communities over the lifetime of the proposed Variation, the Office recommends amendments to further support the implementation of the Local Transport Plan (LTP), and in relation to flood risk the Office recommends amendments to ensure that risk of flooding to people and property is avoided and managed.

With the exception of the specific concerns set out below, the proposed Variation otherwise sets out a clear zoning strategy and framework for the future development of the lands concerned. The issues raised below largely focus on supporting the delivery of the vision of the proposed Variation and building on the ambition of the County Development Plan to develop well serviced, well connected and sustainable neighbourhoods, and promote sustainable modes of transport.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out three (3) recommendations and one (1) observation under the following key themes:

Key theme	Recommendation	Observation
Consistency with core strategy and housing requirements	Recommendation 1	-
Sustainable transport	Recommendation 2	-
Flood risk management	Recommendation 3	-
Built heritage	-	Observation 1

1. Consistency with core strategy and housing requirements

The proposed Variation clearly sets out the context for housing and population growth in Arklow against the core strategy of the County Development Plan, including details of housing completions, extant permissions and current applications for planning permission. This analysis demonstrates that housing delivery has stagnated in Arklow over the past intercensal period and over the lifetime of the Arklow and Environs Local Area Plan 2018-2024 due to the wastewater constraints.

The proposed Variation to provide a development framework for Arklow up until 2028, including the zoning of lands for housing, is being carried out alongside a future Variation to implement the Housing Growth Requirements. The Office would therefore encourage the Planning Authority to reconsider the need for phasing at this point in time, and instead review and rezone, where otherwise appropriate, Residential Phase 2 lands as Phase 1 in order to provide flexibility in delivery of sites and to facilitate the ongoing pipeline for housing delivery and to meet the housing growth requirements as set out in the Housing Growth Requirements.

Recommendation 1 - Residential zoned land

Having regard to the need to provide sufficient housing lands and growth for Arklow and the provision of new homes at locations that can support compact growth and sustainable development, and in particular to:

- NPO 3, NPO 9 of the NPF;

- RPO 3.1, RPO 3.2 of the RSES;
- the policies and objectives of the NPF Implementation: Housing Growth Requirements (2025) (Housing Growth Requirements); and
- section 6.2.3 of the Development Plans, Guidelines for Planning Authorities (2022),

the Office recommends that the Planning Authority:

- (i) reviews the zoning objective for the proposed Residential Phase 2 lands with a view to rezoning as Residential Phase 1 lands that can support compact growth and sequential development and are serviced or serviceable within a reasonable period of time, to ensure a sufficient quantity and flexible landbank of housing lands to meet the Housing Growth Requirements.

2. Sustainable transport

The Office welcomes the preparation of the LTP using the Area Based Transport Assessment Advice methodology, which supports the integration of land use and transport planning by including a range of measures to improve sustainable transport.

The overarching aim of the LTP is to promote a modal shift from private car to sustainable modes during the plan period or to promote sustainable mobility. This will be essential to achieving national mandatory climate action targets to reduce greenhouse gas emissions by 51% by 2030.

Having clear modal shift objectives would assist with achieving these targets and the Office recommends the inclusion of ambitious but realistic mode share targets for Arklow together with an effective monitoring programme within the proposed Variation.

While the LTP sits alongside the proposed Variation, and local transport objectives ARK 68-82 and map no. 6 Active Travel Strategy are included, the Office is concerned the LTP measures and strategy have not been adequately prioritised/phased and integrated into the proposed Variation and recommends that more explicit policy support for the implementation of each preferred modal strategy and associated intervention is provided.

Priorities around existing deficits within the Arklow area, particularly connectivity to proposed new development areas are encouraged and the Office recommends that priority

projects to be progressed during the plan period are identified within the proposed Variation, together with implementation timeframes.

Recommendation 2 - Integration of land use and sustainable transport

Having regard to the need for integration of land use and sustainable transportation, and in particular to:

- NPO 107 and National Strategic Outcome 5 of the NPF (sustainable mobility);
- NPO 93 of the NPF (air quality);
- RPO 8.6 of the RSES (Local Transport Plan (LTP)); and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emission by 51%, the Climate Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021),

the Office recommends that the Planning Authority:

- (i) identifies priority active travel projects and parking options to be progressed during the plan period together with timeframes;
- (ii) incorporates the measures and proposed modal networks, identified in the LTP, and includes policy support and clear mapping for the proposed interventions which identifies connectivity for existing and proposed active travel networks and public transport networks for existing and proposed residential, employment lands and retail sites;
- (iii) includes mode share targets for Arklow together with an effective monitoring programme; and
- (iv) incorporates consistency between terms used in the proposed Variation and LTP, for example interventions, recommendations, and measures, to ensure all LTP measures are adopted and implemented correctly.

3. Flood risk management

The Office welcomes the preparation of the Strategic Flood Risk Assessment (SFRA) in accordance with NPO 1 of the NPF and the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines).

In line with the Flood Guidelines, the Office considers that the Planning Authority needs to address the following additional considerations in the assessment of flood risk in the Arklow area.

Firstly, as the complete set of watercourse mapping is not used for the SFRA, it is not clear how land use zonings have been determined and as such the Planning Authority should review if stage 3 flood risk assessments are required to inform the land use zonings and the SFRA.

Secondly, flood risks from all sources of flooding should be identified and considered in the SFRA including Planning Authority applications to the Office of Public Works (OPW) for minor works schemes, past flood events recorded by the OPW and by the Planning Authority, and any planned flood relief schemes.

Finally, the Office notes that there are discrepancies between the flood zone mapping and the flood extent provided in the SFRA, with sections of the Flood Zone A omitted from the Flood Zone Map. The 0.1% Annual Exceedance Probability to define the flood zones for the flood relief scheme are not provided in the SFRA, and this should be reviewed to ensure flood zones are consistent with the data sets adopted.

In addition, the proposed Variation also provides an opportunity to provide an integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure to avoid reliance on individual site by site solutions, particularly in respect of the SLOs 3-5. Implementation of Urban Nature-based Solutions, Guidance Document for Planners, Developers and Developer Agents (2025) published by the Local Authority Waters Programme provides useful guidance in this regard.

Recommendation 3 - Flood risk management

Having regard to flood risk management, and in particular to;

- NPO 78 of the NPF (avoid inappropriate development in areas at risk of flooding that do not pass the Plan Making Justification Test (Justification Test));
- RPO 7.12 of the RSES (avoiding inappropriate land use zonings and development in areas at risk of flooding and to integrate sustainable water management solutions in accordance with the requirements of the Flood Risk Management Guidelines for Planning Authorities (2009) (Flood Guidelines); and
- the Flood Guidelines,

the Office recommends that the Planning Authority:

- (i) reviews and amends the Strategic Flood Risk Assessment to:
 - a) include mapping of all watercourses present in the Arklow area ensuring that it is fully consistent with the Justification Test as set out in the Flood Guidelines;
 - b) include all zoned lands that can accommodate vulnerable uses and any zoning objective for highly vulnerable development (Flood Zone A or B) or less vulnerable development (Flood Zone A) that does not pass the Justification Test in accordance with the Flood Guidelines should be omitted; and
 - c) address any discrepancies between the flood zone mapping and the flood extent provided, particularly in relation to extents of Flood Zone A which appear to be omitted from the Flood Zone Map; and
- (ii) incorporate integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure in specific SLOs in order to avoid reliance on individual site by site solutions.

The Planning Authority is advised to liaise with the Office of Public Works to address this recommendation.

4. Built heritage

The Office recognises the identification of two significant opportunity sites for town centre regeneration, 'The Alps' site and 'Main Street' site, which are located in a sensitive part of Arklow from an archaeological and architectural heritage aspect. These opportunity sites would benefit from the overlaying of mapping to show the extent of the Arklow Town Area, the area of Archaeological Potential of Significance and the recorded Protected Structures on or in the vicinity of both opportunity sites.

Observation 1 - Built Heritage

Having regard to the provisions for the protection of built heritage, and in particular to:

- NPO 89 of the NPF (protect, conserve and enhance natural, cultural and built heritage); and
- NPO 90 of the NPF (enhance, integrate and protect built heritage assets),

the Office advises that the Planning Authority amends section B:1.4 relating to opportunity sites to:

- (i) overlay the map of the Extent of Arklow Town Area of Archaeological Potential of Significance on the opportunity sites mapping; and
- (ii) indicate the recorded Protected Structures (those identified on the Record of Protected Structures (RPS)) at these locations.

Summary

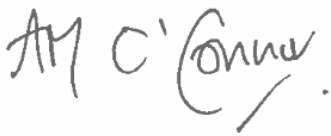
The Office requests that your authority addresses the recommendations outlined above. As you are aware, the report of the Chief Executive of your authority prepared for the elected members under section 13 of the Act must summarise these recommendations and the manner in which they will be addressed.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation. Where your authority decides not to comply with the recommendations of the Office or otherwise makes the plan in such a manner as to be inconsistent with the recommendations made by

this Office, then the Chief Executive shall inform the Office and give reasons for this decision.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, appearing to read 'AM O'Connor'.

Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015
