SLA | Stephen Little & Associates

Amendment to Large-Scale Residential Planning Application & Statement of Consistency Report

352no. Residential Units, Creche & Site Works, as approved under Reg. Ref. 24325

At lands at Tinahisk Upper, Money Big & Money Little, Arklow Co. Wicklow.

For Castlethorn Arklow Limited

OCTOBER 2026

Document Control: -

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1 INTRODUCTION

We, Stephen Little & Associates Chartered Town Planners and Development Consultants have been instructed by our client, Castlethorn Arklow Limited, Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16 (*"the LRD Applicant"*), to prepare this Planning Application Report and Statement of Consistency in support of amendments to the Large-scale Residential Development (LRD) permitted under WCC Reg. Ref. 24/325.

The proposed development comprises of amendments to a development already permitted under WCC Reg. Ref. 24/325. The proposed amendments comprise 352no. dwellings in a mix of houses and apartments ranging in height from 1 to 4 storeys, 1no. creche (c. 711 sq m), and associated landscaping and site development works on lands (c. 12.7Ha) forming part of a larger development already permitted under WCC Reg. Ref. 24/325 on a c. 19.3Ha site. Hard and soft landscaping treatment works being proposed include amendments to public open space involving 9 local parks and the linear park (totalling c. 25,842 sq/m); provision of communal open space (totalling c. 129 sq m); all ancillary site development and landscape works including changes to permitted site levels, relocation of the permitted foul pumping station, 4no. ESB substations, bin stores, 623no. car parking, 52no. cycle parking, public lighting and all associated services, attenuation areas and boundary treatments.

Ancillary site development works proposed in this case include adjustments to the permitted site levels, including road levels, drainage and water main levels and finished floor levels across remaining portions of the overall permitted lands (c. 6.5Ha), including the Revised Phase 2 lands to tie into the amended Revised Phase 1. The Site Layout, including House Types within Phase 2 are not altered.

The proposed development comprises an increase in the residential yield of the overall permitted development from 476no. to 499no. residential units (+23no. units) on an overall site of 19.3 Ha; consolidation of the permitted three-phase development into a revised two-phase delivery strategy, including the delivery of the childcare facility as part of a revised Phase 1. The development otherwise permitted under WCC Reg. Ref. 24/325 remains unaltered.

The report assesses the amendments against the Wicklow County Development Plan 2022–2028, as varied, and the Arklow Local Planning Framework 2026, adopted and effective from 6 July 2026 through Variation No. 6.

The application relates to part of the wider SLO4 lands at Tinahisk Upper, Money Little and Money Big SLO4 extends to c. 63.5 ha and provides for residential development, employment, local shops and services, community and education facilities, and open space. The parent permission relates to an overall development area of c. 19.3 ha. The draft amendment The Amendment application area is c. 12.7 ha and level adjustments across c. 6.5 ha of the remaining permitted lands. The accompanying Site Location Map, prepared by O'Mahony Pike Architects, shows the red line extent of the application site.

An Appropriate Assessment Report and Ecological Impact Assessment Report, prepared by Altemar, have been prepared in respect of the proposed development and accompany this application.

This amendment to LRD Planning Application Report and Statement of Consistency sets out how, in our opinion, the proposed development complies with the proper planning and development of this site in the context the relevant strategic and local planning policy, as expressed primarily in: -

- Climate Action Plan 2025
- National Sustainable Mobility Action Policy 2026-2030
- Delivering Homes, Building Communities 2025-2030
- First Revision to the National Planning Framework, Ireland 2040 (April 2025)
- Eastern & Midlands Regional Spatial & Economic Strategy 2019-2031
- Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities (2024)
- Design Standards for Apartments Guidelines for Planning Authorities (2025)
- Draft National Planning Statement on Planning Design Standards for Apartments (2026)
- Urban Development and Building Height Guidelines (2018)
- Quality Housing for Sustainable Communities (2007)
- The Planning System and Flood Risk Management (2009)
- Design Manual for Urban Roads & Streets (2019)

- Childcare Facilities, Guidelines for Planning Authorities (2009)
- Wicklow County Development Plan 2022-2028, as varied
- Arklow Local Planning Framework 2026

This Report, prepared by Stephen Little & Associates, Chartered Town Planners & Development Consultants, should be read in conjunction with the plans and particulars submitted with this application. A list of the various accompanying material is outlined in the enclosures list at the end of this Report.

A dedicated website has been set up at: www.TinahiskPhase1LRDAmendments.ie to facilitate inspection of the plans and particulars that make up the LRD planning application.

For a more comprehensive description of development please refer to Section 5 of this report, and to the plans and particulars that accompany this pre-planning submission.

This LRD application has been prepared on behalf of the Applicant Castlethorn Arklow Limited by: -

- Stephen Little & Associates, Chartered Planners and Development Consultants.
- O'Mahony Pike Architects
- Waterman Moylan Engineering Consultants
- Doyle & O'Troithigh Landscape Architects
- Digital Dimensions
- Altemar
- AWN Consulting
- Altemar Ecological Consultants
- Arborists Associates
- De Faoite Archaeology
- Sabre Electrical Services Ltd
- TEM Engineering & Management DAC
- Wave Dynamics Acoustics Monitoring Environmental

In accordance with the statutory Regulations, we confirm that an electronic fund transfer to the sum of **€50,879.2** has been made to Wicklow County Council as the appropriate fee in this instance (352no. units x €130) + (€7.20 per square metre (711sq/m) to a maximum of €32,000 for creche building) = €45, 760 + €5,119.20). This covers application fee for proposed residential units and non-residential floor space. Proof of payment is enclosed.

The LRD Application Form (Form 19) associated with this stage of the LRD Application Process has been completed and is also enclosed herewith.

A complete list of enclosures with this application can be found at Section 12 of this Report.

The enclosed planning application drawings have been screened by this office for consistency with the requirements of the Planning & Development Regulations 2001, as amended.

2 THE APPLICANT

The Applicant in this case is Castlethorn Arklow Limited, the required details of which are as follows: -

Name: Castlethorn Arklow Limited (Company No: 808309)

Address: Overend House, Dundrum Town Centre, Sandyford Road, Dundrum, Dublin 16.

Telephone: 01 2164060

Email: hpanahi@castlethorn.ie

3 LAND OWNERSHIP

The LRD Applicant has acquired an interest in the majority of the overall development site as per permitted planning Reg. Ref. No. 24/325.

The LRD Applicant, Castlethorn Arklow Limited, is a company related to Castlethorn, the Prospective Applicant at LRD Stage 2 in this instance, which has been arranged specifically to make this application.

A small portion of the lands is within the ownership/control of Michael Byrne and Ginpole Holdings Limited respectively, details of which are shown on the Site Ownership Map. We would highlight that the red line application site boundary does not change from that of the previously consented LRD scheme under Reg. Ref. 24/325. The permitted access arrangements include works associated with the bridge over the Dublin–Rosslare railway line, for which consent was provided in the parent application context. Notwithstanding, letters of consent from Michael Byrne, and Ginpole Holdings Limited accompany the current LRD amendment application. The extent of the third party lands is identified on the accompanying Site Location Map, prepared by O'Mahony Pike Architects.

4 COMPLIANCE WITH LRD PLANNING LEGISLATION

4.1 LRD Definition

The development proposed seeks amendments to the residentially-led mixed use development permitted at a site of approximately 12.7 hectares at lands at Tinahisk Upper, Money Little and Money Big, Arklow, Co. Wicklow.

We consider the development now being proposed is Large Scale Residential Development (LRD) as defined by the Section 2 of the Planning & Development Act 2000 (as amended).

Section 2 of the Act confirms, *inter alia*, that: -

> *" 'LRD' means large-scale residential development;*
>
> *…*
>
> *'large-scale residential development' means a development that includes -*
>
> *(a)* ***the development of 100 or more houses,***
>
> *(b) the development of student accommodation that includes 200 or more bed spaces,*
>
> *(c) both the development of 100 or more houses and of student accommodation, or*
>
> *(d) both the development of student accommodation that includes 200 or more bed spaces and of houses.*
>
> *where the LRD floor space of -*
>
> *(i)* ***in the case of paragraph (a), the buildings comprising the houses,***
>
> *(ii) in the case of paragraph (b), the student accommodation,*
>
> *(iii) in the case of paragraphs (c) and (d), the buildings comprising the houses and the student accommodation,*
>
> ***is not less than 70 per cent****, or such other percentage as may be prescribed, of the LRD floor space of the buildings comprising the development;*
>
> ***'LRD floor space'****, in relation to a building or part of a building, means the area ascertained by the internal measurement of the floor space on each floor of a building or part of a building (including internal walls and partitions), disregarding any floor space provided for—*
>
> *(a) the parking of vehicles by persons –*
>
> *i. occupying or using the building or the part of the building,*
>
> *ii. for a purpose incidental to the primary purpose of the building or part of the building,*
>
> *and*

(b) *ancillary residential services, including gyms and child-care facilities;*

The proposed development comprises 352 no. residential units and associated community and enabling infrastructure within Revised Phase 1 of the permitted scheme. The application lands are principally zoned RN – New Residential under the Arklow Local Planning Framework 2026, the objective of which is

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

The purpose of the RN zoning is to facilitate high-quality new residential development at appropriate densities, with excellent layout and design, well linked to the town centre and community facilities, and to provide an appropriate mix of house sizes, types and tenures to meet household needs and promote balanced communities.

Other parts of the wider permitted development include lands zoned LSS – Local Shops and Services, CE – Community and Education, and OS1/OS2 open-space designations. Lands zoned CE provide for a School reservation site, whilst the OS1 and OS2 lands provide for the linear park and LSS lands as approved provide commercial units.

Revised Phase 1 comprises 352no. residential units and associated childcare facility. The application lands are principally zoned RN (New Residential) under the Arklow Local Planning Framework 2026.

The RN zoning supports new residential development and associated facilities during the lifetime of the Local Planning Framework.

The Arklow Local Planning Framework 2026, incorporated into the Wicklow County Development Plan 2022-2028 by Variation No. 6, identifies the former RN1 and RN2 lands under the single RN (New Residential) designation.

We are of the professional planning opinion that the development is correctly categorised as LRD having regard to the above terms.

4.2 LRD Consultation

We can confirm that a Section 247 Pre-Planning Consultation meeting took place with the Planning Authority, on 9 June 2026. We refer the Planning Authority to Section 6 of this Report which provides further detail.

In a letter dated 3 July 2026, Wicklow County Council states its determination, based on the plans and particulars received, and having reviewed the request, and *"having regard to the existing planning permission PRR 24/325 and the provisions of Section 247(7), the Planning Authority is off the opinion that the proposed development for the amendment of the LRD development permitted by reference to PRR 24/325, and which will have the same redline boundary, access arrangements, infrastructure connections, social infrastructure, would it is considered be substantially the same as the permitted development*

Furthermore, it is considered that the nature , scale and effect of the alterations are such that they do not require the consultation process for LRD developments as set out in S247 (1A) of the Planning and Development Act 2000 (as amended) to be repeated."

The Planning Authority's determination notification, dated 3 July 2026, is enclosed with this planning application.

Consequently, and for avoidance of doubt, there is no Planning Authority LRD Opinion or corresponding 'Applicant's Response' to such Opinion accompanying this LRD planning application.

4.3 Statutory Notice

In accordance with Article 18(1)(d)(iv) of the Regulations the planning notice includes confirmation that the planning application is LRD and includes a web address where the application can be viewed (www.TinahiskPhase1LRDAmendments.ie).

5 SITE DESCRIPTION & CONTEXT

The subject lands are located at Tinahask Upper, Money Little and Money Big on the southern side of Arklow and extend to approximately 19.3 ha. Under the Arklow Local Planning Framework 2026, the lands form part of SLO4 – Tinahask Upper, Money Little and Money Big, a wider c.63.5 ha mixed-use growth area. SLO4 is bounded to the north by SLO3, to the east by Arklow Golf Club and quarry lands, to the south by open farmland and to the west by the Dublin–Rosslare railway line. Existing access to SLO4 is provided by an access road and railway bridge from Knockmore Roundabout. The Local Planning Framework (LPF) expressly recognises the extant permission for development of the subject c.19.3 ha area, including 476 no. residential units, public open space, local shops and services, community and office space, childcare, railway bridge works and part of the Port Access Road.

The site is approximately 2.2 km from Arklow Main Street. Arklow Train Station is approximately 2 km from the site entrance and provides rail connectivity towards Dublin Connolly, Wexford and Rosslare Europort. Existing schools, retail, community, recreational and other town-centre facilities are accessible within the wider Arklow urban area. The proposed Port Access Route forms an important element of the movement framework associated with the development lands.

Figure 1: Application site outlined approximately in red (19.3ha) with areas shaded brown outside amendment application (12.7ha) (Source: Google Maps, with red overlay and brown shading by SLA). Please refer to the enclosed Site Location Plan prepared by O'Mahony Pike Architects, for the definitive red line boundary of the subject site.

5.1 Existing and Consented Development

The lands are subject to the extant parent permission under Reg. Ref. 24325. The permitted development established the overall land-use, movement, open-space and infrastructure framework for the site. The amendment application does not seek to reopen the principle of development; rather, it modifies the residential layout, unit mix, phasing and certain engineering details while retaining the principal strategic elements of the permitted scheme.

The parent scheme included approximately 1.3 ha of public open space distributed across 13 local parks and approximately 2.2 ha of passive open space/public parkland to the south. The permitted childcare facility was approximately 944 sq m with capacity for 188 children and associated outdoor play space. These community and amenity components formed an important part of the infrastructure-led approach accepted by the Planning Authority and remain relevant to the assessment of the amendments.

We refer to the sections below for details of the consented scheme at this site.

Parent Consent - WCC Reg. Ref. 24325

Wicklow County Council issued a decision to grant permission on 21 January 2025 under Reg. Ref. 24325 for the parent LRD. The permitted scheme provides 476 no. residential units comprising houses, duplexes and apartments, together with a two-storey childcare facility, a three-storey mixed-use neighbourhood centre containing retail, community and office uses with apartments above, a network of 13 local parks, a substantial public/passive open-space area, strategic road and active-travel infrastructure, works to the existing railway bridge, part of the Port Access Road, access and services to the Community and Education lands, drainage, utilities, landscaping and associated site development works. The amendment application should therefore be assessed in the context of this established residential-led mixed-use framework.

Figure 2: Extract from Approved Site Layout Plan Drawing under WCC Reg. Ref. 24325, prepared by Molloy Architecture

6 LRD CONSULTATION WITH PLANNING AUTHORITY

6.1 Section 247 Consultation

A section 247 consultation was held on 9 June 2026 and was attended by the following Planning Authority officers:

- Edel Bermingham, Senior Planner
- Patrice Ryan, Senior Executive Planner
- Robert Kelly, Executive Scientist, Environmental Waste Management Section
- Avril Hill, Senior Executive Engineer Arklow MD
- Danielle Gannon, LRD Admin
- Patrick O'Connor, Senior executive Engineer, Transportation and Roads Infrastructure Section
- Micheál Penston, Executive Engineer, Transportation and Roads Section
- Bryan Mazango, Executive Engineer, Transportation and Roads Section

The material presented to the Planning Authority described the revised residential layout, unit mix, phasing strategy and engineering refinements.

The following is a summary of the main points raised during the s.247 pre-planning meeting consultation: -

- Amendments should remain within the scope of the parent permission. The application boundary should cover the permitted site, with the proposed amendments clearly identified.
- Advised that the overall density of 40 dph should be achieved.
- Cross sections through the proposed houses should accompany the application..
- Public open-space proposals, including pocket/neighbourhood parks and active open-space areas, should clearly demonstrate the required equipped play provision and, where applicable, an appropriately sized Multi-Use Games Area (MUGA), consistent with County Development Plan Objective CPO 7.37 and the SLO4 open-space requirements.
- The design of houses must be different for every 150no. houses. Suggested houses closer to the school could look slightly different and opposite of side access route.
- To incorporate universal design.
- To incorporate nature-based solutions.
- Advised to contact Mary Cahell, WCC Senior Engineer regarding surface water.
- Advised to contact WCC David Porter regarding Part V.
- Advised to contact ESB .
- It was noted that Wicklow County Council would not take the proposed pumping station in charge (TiC); the ownership, management and maintenance arrangements should therefore be clearly identified in the application documentation.
- To incorporate climate change (e.g. solar panels).
- Phasing needs to tie into the infrastructure and extant permission, scale of development needs to be clear.
- Proposed development needs to tie into active travel.
- The application to include CEMP and RWMP.

6.2 Section 32(C) & 32(D) – Skip Stage 2 LRD Meeting

Following the Section 247 meeting held on the 9 June 2026. The Planning Authority determined that the nature, scale and effect of the alterations are such that they do not require the consultation process for LRD developments as set out in S247 (1A) of the Planning and Development Act 2000 (as amended) to be repeated.

A letter confirming that further consultation process for LRD developments as set out in S247 (1A) of the Planning and Development Act 2000 (as amended) needs not be repeated was issued by Wicklow County Council, dated 03 July 2026.

6.3 Other Consultation with Council Departments

In addition to the above formal Pre-Planning Meeting, there were a number of informal consultation meetings held with officials from individual Council Departments throughout this LRD application process, which have informed the planning application plans and particulars.

WCC Water and Environmental Services

Waterman Moylan Consulting Engineers engaged with Mary Cahill, Senior Engineer regarding surface water prior to this submission.

Waterman Moylan Consulting Engineers have additionally engaged with Wicklow County Council regarding the pumping station location on the eastern edge of the application site prior to this submission.

WCC Housing Section

The applicant engaged with WCC Housing Section prior to this submission. A Part V validation letter dated 28 September 2026 was issued by the housing unit of Wicklow County Council which notes the agreement of 70 units fulfills obligations under Part V of the Planning and Development Acts, as amended.

6.4 Prescribed Bodies

Electricity Supply Board (ESB)

D&W engaged with ESB prior to this submission which informed the necessary number of ESB sub-stations across the site.

Uisce Éireann

Waterman Moylan Consulting Engineers engaged with Uisce Éireann prior to this submission.

A **Confirmation of Feasibility** (CoF) from Uisce Éireann, dated 26 June 2026 is enclosed with this LRD application. This CoF confirms that wastewater connection and water supply connections are feasible, subject to infrastructure upgrades. See **Appendix A** of the Engineering Assessment Report.

7 PARTICULARS OF THE PROPOSED DEVELOPMENT

7.1 Description of Development

It is intended that planning permissions is being applied for amendments to consented Large-scale Residential Development permitted under WCC Reg. Ref. 24325 consisting of 352no. residential units in a mix of houses and apartment units, ranging in height from 1 to 4 storeys.

The overall development proposed comprises the following: -

- 334no. houses (44no. 2-bed, 241no. 3-bed, 49no. 4-bed houses in buildings ranging from 2 to 3 storeys)
- 18no. apartment units (6no. 1-bed and 12no. 2-bed units and the ground floor creche (c. 711 sqm) with associated outdoor play area (c. 294 sqm), in 1no. 1 to 4-storey building (Block A).

Hard and soft landscaping treatment works being proposed include amendments to public open space involving 9 local parks and the linear park (totalling c. 25,842 sq/m); provision of communal open space (totalling c. 129 sqm); all ancillary site development and landscape works including changes to permitted site levels, relocation of the permitted foul pumping station, 4no. ESB substations, bin stores, 623no. car parking spaces, 52no. cycle parking, public lighting and all associated services, attenuation areas and boundary treatments.

Ancillary site development works proposed in this case include adjustments to the permitted site levels, including road levels, drainage and water main levels and finished floor levels across remaining portions of the overall permitted lands (c. 6.5 Ha), including the Revised Phase 2 lands to tie to the amended Revised Phase 1.

The proposed development comprises of amendments to a development already permitted under WCC Re. Ref. 24/325. The proposed amendments comprise an increase in the residential yield of the overall permitted development from 476no. to 499no. residential units (+ 23no. units) on an overall site of 19. 3 Ha, consolidation of the permitted three-phase development into a revised two-phase delivery strategy, including the delivery of the childcare facility as part of a revised Phase 1. The development otherwise permitted under WCC Reg. Ref. 24/325 remains unaltered.

Vehicular site access will be as permitted under WCC Reg. Ref. 24/325 and be via the permitted access road and railway overbridge from Knockmore Roundabout, and will include the construction of part of the Port Access Road. The permitted development includes upgrade works

7.2 Unit Mix

Within the principal amendment area, Revised Phase 1 provides 352 no. residential units comprising 334 no. houses and 18 no. apartments over the childcare facility. This compares with 329 no. units in the equivalent permitted area, which comprised 207 no. houses, 66 no. duplexes and 56 no. apartments. The amendment therefore materially increases the proportion of own-door houses while retaining a good mix of dwelling types within the overall development.

Houses			
Unit Type	**No. of Units**	**GFA (m2) / Unit**	**Min. Size – Guidelines 2007 (m2)**
H2A – 2 bedroom (4-person)	11	81	80
H2A1 – 2 bedroom (4-person)	6	81	80

H2B – 2 bedroom (4-person)	21	84.2	80
H2B1 – 2 bedroom (4-person	6	84.2	80
H3B – 3 bedroom (4-person)	57	91.5	83
H3B1 – 3 bedroom (4-person)	8	91.5	83
H3B2 – 3 bedroom (5-person)	17	100.3	92
H3D – 3 bedroom (5-person)	27	94.8	92
H3D1 – 3 bedroom (5-person)	3	94.8	92
H3D2 – 3 bedroom (5-person)	9	103	92
H3E – 3 bedroom (5-person)	5	103.6	92
H3E1 – 3 bedroom (5-person)	4	103.6	92
H3E2 – 3 bedroom (5-person)	24	105.3	92
H3E3 – 3 bedroom (5-person)	1	103.6	92
H3E5 –3 bedroom (5-person)	4	105.3	92
H3G – 3 bedroom (5-person)	50	103.3	92
H3G1 – 3 bedroom (5-person)	16	103.3	92
H3G2 – 3 bedroom (5-person)	2	105.4	92
H3Q – 3 bedroom (5-person)	13	123.7	92
H3Q1 – 3 bedroom (5-person)	1	123.7	92

H4A – 4 bedroom (6-person)	19	120	110
H4B1 – 4 bedroom (7-person)	14	141.2	110
H4E – 4 bedroom (7-person)	4	168.5	110
H4M – 4 bedroom (7-person)	12	140.9	110
Total	**334**		
Apartments			
Unit Type	**No. of Units**	**GFA (m2) / Unit**	**Min. Size – Guidelines 2025 (m2)**
A2A – 2 bedroom (4-person)	3	74.5	73
A2B1 – 2 bedroom (4-person)	3	81.4	73
A2C – 2 bedroom (4-person)	3	74.6	73
A2B – 2 bedroom (4-person)	3	80.3	73
A1A – 1 bedroom	3	55	45
A1B – 1 bedroom	3	46.5	45
Total	**18**		
Overall Total	**352**		

Table 1: Residential Development Proposed

It can be seen from the table above, that the houses and apartments proposed in this case are significantly larger than the minimum standards provided for by the Guidelines.

We refer to the Housing Quality Assessment and Schedule of Accommodation and Housing Quality Assessment, together with the House Type drawings, prepared by O'Mahony Pike Architects.

7.3 Design and Layout

In the first instance, we refer the Planning Authority to the Architectural Design Statement, prepared by O'Mahony Pike Architects, which sets out the design rationale for the proposed development having regard for the specific context of the site.

Figure 3: Extract from Proposed Site Layout Plan Drawing, prepared by O'Mahony Pike Architects

7.4 Phasing

The amended scheme consolidates the permitted three phases into two phases. This is a change to sequencing and delivery rather than to the fundamental infrastructure-led strategy accepted under the parent permission.

Item	Detail
Revised Phase 1	352 no. residential units; crèche; distributor road and strategic road infrastructure; public open space; active-travel infrastructure; engineering services and infrastructure necessary to satisfy the relevant phasing requirements.
Revised Phase 2	147 no. residential units; retail floorspace; office accommodation; community meeting room; sports pitch/active open space; school reservation site and associated facilities; public open space; remaining road and engineering infrastructure.

Revised Phase 2 retains 147 no. residential units comprising 81 no. houses, 34 no. duplexes and 32 no. apartments, with an overall site net residential density of approximately 40.8 dwellings per hectare. The revised phasing facilitates earlier delivery of the childcare facility and coordinates housing delivery with the provision of strategic infrastructure and community facilities.

Figure 4: Extract from Proposing Phasing Plan, prepared by O'Mahony Pike Architects

7.5 Density

The overall residential yield increases modestly by 23 no. units, from 476 no. to 499 no. units. The overall net residential density is approximately 40.8 dwellings per hectare. This density sits within the 30–50 dwellings per hectare range identified in the Compact Settlements Guidelines 2024 for *Suburban and Urban Extension* locations in *Key Towns and Large Towns*.

<u>Compact Settlement Guidelines – Settlement Categorisation</u>

Under these Guidelines, the site can be described as a Key Town / Large Town (+5,000 population)

– Suburban / Urban Extension which is defined in the guidelines as follows: -

> *"Suburban areas are the low-density car-orientated residential areas constructed at the edge of. The town, while urban expansion 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 the Guidelines that residential densities in the range 30 dph to 50 dph (net) shall generally be applied at suburban and suburban and urban extension locations*** *(as defined in Table 3.8)"*

The proposed net density of 40.8 dph in this amendment for the overall site is in accordance with the Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities, as identified above, ensuring sustainable and compact growth. This is an amendment application to an extant planning permission granted under Reg. Reg. 24/325, as considered acceptable by the planning authority would result in a modestly increased density of development on the subject lands.

Table 3.8: Accessibility

High Capacity Public Transport Node or Interchange

- Lands within 1,000 metres (1km) walking distance of an existing or planned high capacity urban public transport node or interchange, namely an interchange or node that includes DART, high frequency Commuter Rail[11], light rail or MetroLink services; or locations within 500 metres walking distance of an existing or planned BusConnects 'Core Bus Corridor'[12] stop.
- Highest densities should be applied at the node or interchange and decrease with distance.
- 'Planned public transport' in these Guidelines refers to transport infrastructure and services identified in a Metropolitan Area Transport Strategy for the five cities and where a public authority (e.g. National Transport Authority, Transport Infrastructure Ireland or Irish Rail) has published the preferred route option and stop locations for the planned public transport.

Accessible Location

- Lands within 500 metres (i.e. up to 5-6 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services.

Intermediate Location

- Lands within 500-1,000 metres (i.e. 10-12 minute walk) of existing or planned high frequency (i.e. 10 minute peak hour frequency) urban bus services; and
- Lands within 500 metres (i.e. 6 minute walk) of a reasonably frequent (minimum 15 minute peak hour frequency) urban bus service.

Peripheral

- Lands that do not meet the proximity or accessibility criteria detailed above. This includes all lands in Small and Medium Sized Towns and in Rural Towns and Villages.

Figure 5: Extract from Table 3.8 of Sustainable Residential Development and Compact Settlement Guidelines for Planning Authorities.

As highlighted above, Arklow is a Large Town / Self-Sustaining Growth Town within the County settlement hierarchy and, for the purposes of the Compact Settlements Guidelines, the subject lands are appropriately considered as a "Key Town / Large Town (+5,000 population) – Suburban / Urban Extension" location. The Guidelines generally support net residential densities of 30–50 dwellings per hectare at such locations. In accessibility terms, the Arklow LPF confirms that the previously zoned growth lands are within reasonable walking distance of existing or committed public transport, including within approximately 30 minutes' walk of Arklow Train Station and approximately 15 minutes' walk of existing or committed bus services, with opportunities to improve these walking distances through new permeability and active-travel connections.

While the site may be classified as peripheral in strict accessibility terms, as previously concluded by WCC, the presence of rail services at Arklow Train Station together with local bus connectivity supports its classification as an 'Intermediate' accessibility location, as acknowledged by the Planning Authority in the assessment of the extant permission.

Public Transport

Arklow Railway Station provides inter urban rail connectivity on the Dublin-Rosslare line. The Arklow LPF seeks to support improvements to mainline rail services, including an hourly Wexford-Greystones-Arklow shuttle and, in the longer term, phased delivery of dual track between Dublin and Wexford,

together with accessibility improvements at Arklow Station. The Local Planning Framework also seeks to improve pedestrian and cycle connections to the station.

Bus

The closest bus stop serving the Subject Development is located 500 m (7minute walk) from the site along Wexford Road (R772). The bus routes operating at this bus stop are 740A and 2. Bus route 740A has a frequency of 1 to 2 hours northbound and operates 4 services southbound, and bus route 2 operates every 1 to 2 hours.

The Arklow Local Planning Framework identifies existing and committed bus services as an important component of the town's sustainable transport network and seeks the improvement of existing and provision of new bus services within Arklow and to the wider region, including bus-priority measures and a future dedicated town bus service. The Local Transport Plan identifies the need to ensure that new development is accessible by sustainable transport and notes that the established growth lands are within reasonable walking distance of existing or committed bus services. The proposed development retains and enhances pedestrian and cycle connections to the wider movement network, supporting access to public transport and reduced dependence on the private car.

As adopted by way of Material Amendment No. 28 Active Travel Strategy 'ATX' transects from the Knockmore/Northwood/R772 roundabout from east to west along the application site which this application will deliver. This will enhance connections between existing bus stops along the R772.

As can be noted on Map No.5 of the Arklow Local Planning Framework, an indicative bus route "A" will also travel from the north of the town to the south of the town and along the main throughfare known as the Southern port Access Road (SPAR) which this development will partially deliver, helping to realise aspirations of the Framework.

7.6 Height

The amendment sought feature a minor increase in building-height within the Local Shops and Services zoning by way of the apartment block in a total height of 4 storeys with creche located at ground floor. This minor change, aids place making with the LSS zoned lands and provides a mixed use building within this area. The building of marginal height will provide clear place making and help identify the creche at ground floor for visitors. This increase in height is strategically located closest to the connection to Arklow train station to the west and will be the most accessible sections of the site, adjacent the indicative bus route "A" immediately to the south. In line with SLO4 this variation will help achieve a sense of place and allow for visual diversity with a materiality palette which complements the wider development in a cohesive manner.

Aside from this change, the principal change pertains predominately to housing typology and layout, with a greater proportion of own-door houses and fewer duplex/apartment units. Overall, the amended development therefore remains consistent with the established scale and residential character of the permitted scheme whilst avoiding monoculture development and delivering creche facilities in Phase 1 as can be noted in Figure 4.

7.7 Amenity Space and Landscaping

Public Open Space

We refer the Planning Authority to the **landscape plans** and particulars including landscaping masterplan, prepared by Doyle & O'Troithigh Landscape Architects for further detail.

Figure 6: Extract from Landscape Masterplan Drawing, prepared by Doyle & O'Troithigh Landscape Architects

Private Open Space

We refer to the enclosed **Housing Quality Assessment**, prepared by O'Mahony Pike Architects for details regarding the quantum provided.

7.8 Access, Movement and Active Travel

The principal access arrangements, distributor road and road hierarchy remain substantially as permitted. The development continues to provide internal residential streets and pedestrian and cycle connections., with the revised phasing coordinating delivery of strategic road and active travel infrastructure. The proposed development include road upgrade works existing railway overbridge and the western approach to same including the provision of a 2.5m footpath, 6m carriageway, safety barrier improvement works and other ancillary works. In line with Active Travel objective 'ATX' cycle paths will be provided to the south of the site in line with the Arklow Local Planning Framework Plan.

7.9 Bicycle Parking

Bicycle parking spaces at a rate of 1no. space per bedroom proposed, together with 10no. public/visitor spaces. This is in accordance SPPR 4 of the Compact Settlement Guidelines (2024).

A total of 52no. bicycle parking spaces are provided, comprising 30no. spaces for residents and 10no. spaces for visitor spaces. Additionally, 12no. cycle parking spaces are proposed for the creche.

Housing units have access to their rear gardens to store bikes.

We otherwise refer the Planning Authority to the enclosed **Traffic and Transportation Statement**, prepared by Waterman Moylan Consulting Engineers and **Parking Schedule**, prepared by O'Mahony Pike Architects for further detail.

7.10 Car Parking

A total of 623no. car parking spaces are proposed comprising 391 for houses (on-curtilage), 118 for houses (off-curtilage), 73 for houses (unallocated and visitors, including 4 accessible) resulting in a ratio of 1.7 per housing unit. Apartment parking includes 10 spaces allocated, 3 visitor including 1 accessible resulting in a parking ratio of 0.8 per apartment. 2 spaces are dedicated as shared 'Go Car' spaces whilst 26 spaces are allocated to the creche, 1 space which is accessible.

We refer the Planning Authority to the enclosed **Traffic and Transportation Statement**, prepared by Waterman Moylan Consulting Engineers and **Parking Schedule**, prepared by O'Mahony Pike Architects for further detail.

7.11 Water & Drainage Services

We refer the Planning Authority to the enclosed Engineering Assessment Report and Drainage Drawings, prepared by Waterman Moylan Consulting Engineers, which provides the relevant details regarding water and drainage infrastructure included within the proposed development. The associated appendices include a **Confirmation of Feasibility** from Uisce Eireann and confirmation that a connection application was submitted to Uisce Eireann on 26 June 2026. A Confirmation of Feasibility was issued by Uisce Eireann confirming that a connection into the existing wastewater network is feasible without infrastructure upgrades by Uisce Eireann and a connection into the existing water network is feasible subject to upgrades, which can be viewed in Waterman Moylan Consulting Engineers Engineering Assessment Report, Appendix A.

7.12 Flood Risk

A Flood Risk Assessment (FRA), prepared by Waterman Moylan Consulting Engineers is enclosed with this application and concludes: -

> *"The subject site has been analysed for risks from tidal and fluvial flooding, pluvial flooding, groundwater, and drainage system failures due to human error or mechanical system failure. As the flood risk from all sources can be mitigated, reducing the flood risk to low or very low, the proposed development is considered acceptable in terms of flood risk."*

The site lies outside Flood Zones A and B as mapped in the Wicklow County Development Plan 2022–2028 SFRA. The site is therefore located within Flood Zone C, where the probability of fluvial flooding is low (less than 0.1% AEP, or 1 in 1000 years).

7.13 Part V

It is proposed to provide 70no. units to meet the Part V obligations (i.e. 20% of the site, or equivalent monetary value). This includes 18 social apartments, 17 social houses and 35 affordable houses. Further details can be seen on the Part V masterplan which was prepared by O'Mahony Pike Architects for further detail along with the Part V Costings Letter, prepared by Stephen Little & Associates and Castlethorn.

A Part V Validation Letter from Wicklow County Council Housing Department is enclosed with this application. In total 70no. units will be provided subject to final agreement with the planning authority.

7.14 Daylight & Sunlight

We refer the Planning Authority to the accompanying **Daylight & Sunlight Analysis**, prepared by Digital Dimensions.

The Report finds: -

> *"All habitable rooms in the apartment units meet the minimum standard for daylight provision as per BS EN 17037:2018+A1:2021 as referred to in the BRE guidelines BR209:2022. In the assessment of daylight in accordance with IS EN 17037:2018+A1:2021, shown for supplementary information, all habitable rooms in the apartment units achieve daylight provision as set out in IS EN 17037:2018+A1:2021 It is our opinion that all habitable rooms within the proposed development achieve the minimum target daylight levels set out in BS EN 17037:2018+A1:2021, as referred to in the BRE guidelines BR209:2022 and no compensatory measures are required."*

The report also notes with regards to sunlight within the Proposed Development: -

> *"This scheme is well designed for sunlight. In the houses 100% will achieve the minimum target sunlight hours to a room. In the apartment units 94.4% meet the minimum recommended 1.5 direct sunlight hours. This exceeds the BRE guideline example for an apartment layout where 4 in 5 (circa 80%) achieves the target sunlight hours.*
>
> *All proposed public and communal amenity spaces achieve sunlight levels that exceed two hours sunlight over 50% of the required amenity space on the 21st March.*
>
> *The proposed development meets the recommendations for sunlight in the BRE guidelines BR209:2022."*

7.15 Childcare & Community

The childcare facility remains an integral component of the overall scheme but is now proposed for earlier delivery in Revised Phase 1 within the ground floor of Apartment Block A and features a creche of 711 sq/m and outdoor play area of 294 sq/m. This childcare facility has capacity to accommodate 135 no. children.

The neighbourhood centre uses, including retail, office and community meeting-room accommodation, remain within Revised Phase 2 and are unchanged by this proposal.

The school reservation site and active recreation facilities are also retained as part of the overall development framework. In line with the previously imposed condition, 0.65HA remains for the overall school site including sports pitch which will front the linear park in full compliance with the Arklow Local Planning Framework.

7.16 Construction Environmental Management Plan

A **Construction Environmental Management Plan (CEMP)** has been prepared by AWN Consulting. This details how the construction phase will be managed with minimal impacts on the environment or the surrounding community.

We confirm that a fully comprehensive Construction Environmental Management Plan to implement the requirements of the preliminary Construction Management Plan will be submitted to the Planning Authority for its approval in advance of any works commencing on site, should the Planning Authority grant permission for the proposed development. We respect a planning condition on same.

7.17 Waste Management Plans

A **Resource Waste Management Plan**, prepared by AWN Consulting, is enclosed with this application. The plan aims to ensure maximum recycling, reuse and recovery of waste with diversion from landfill, wherever possible. It also seeks to provide guidance on the appropriate collection of and transport from

the site to prevent issues associated with litter or more serious environmental pollution (e.g. contamination of soil and/or water).

An **Operational Waste Management Plan** has also been prepared by AWN Consulting and is enclosed with the submission. This provides details of how waste produced during the operation of the proposed development will be disposed of and treated in accordance with the relevant guidance for same.

7.18 Energy Statement

An **Energy Efficiency and Climate Change Adaptation Design Statement**, prepared by TEM Consulting is enclosed with this application.

7.19 Archaeology

An **Archaeological Impact Assessment with Test Trenching Report** prepared by De Faoite Archaeology, is enclosed with this application and sets out recommendations in section 8. In line with the previous grant issued by WCC under Reg. Ref. 24/325 the proposed amendments have been assessed with reference to the locations of Burnt Mounds C3 and C4. Burnt mound C4 is located with the amendment site whilst C3 is outside of the amendment area.

8 STRATEGIC PLANNING CONTEXT – STATEMENT OF CONSISTENCY

Please refer to **Appendix A** for detailed response to National and Regional Planning policy, as well as Section 28 Ministerial Guidelines prepared by Stephen Little & Associates.

The proposed development has full regard to the relevant national, regional and local planning policy framework, including the National Planning Framework First Revision (2025), RSES, Climate Action Plan 2025, Sustainable Residential Development and Compact Settlements Guidelines (2024), Design Standards for Apartments Guidelines (2025), DMURS, the Planning System and Flood Risk Management Guidelines, the Wicklow County Development Plan 2022-2028 (as varied) and the Arklow Local Planning Framework 2026.

The proposed development meet the requirements of the relevant SPPRs and are otherwise also consistent with the Wicklow County Development Plan 2022-2028.

9 STATUTORY DEVELOPMENT PLAN – STATEMENT OF CONSISTENCY

The Wicklow County Development Plan 2022-2028, as varied, is the statutory land-use plan governing the subject lands. The Arklow Local Planning Framework 2026 was adopted and became effective on 6 July 2026 as a Variation to the County Development Plan and must be read in conjunction with it.

The subject lands are located within the Arklow Local Planning Framework area and principally within Specific Local Objective SLO4 - Tinahask Upper, Money Little and Money Big.

This Statement of Consistency identifies the County Development Plan and Arklow LPF objectives of particular relevance to the proposed amendments and provides the Applicant's response to each thematic policy area.

9.1 Arklow Local Planning Framework 2026

The County Development Plan provides the overarching statutory strategy for housing, sustainable communities, transport, water services, flood risk, climate action, heritage and biodiversity. The Arklow Local Planning Framework translates that strategy to settlement level and provides the applicable zoning and Specific Local Objectives for the subject lands.

The Arklow Local Planning Framework expressly states that the residential development strategies, objectives and standards of the County Development Plan apply directly in Arklow, including those relating to location, compact growth, phasing, density, universal design and quality of design.

Land Use Zoning

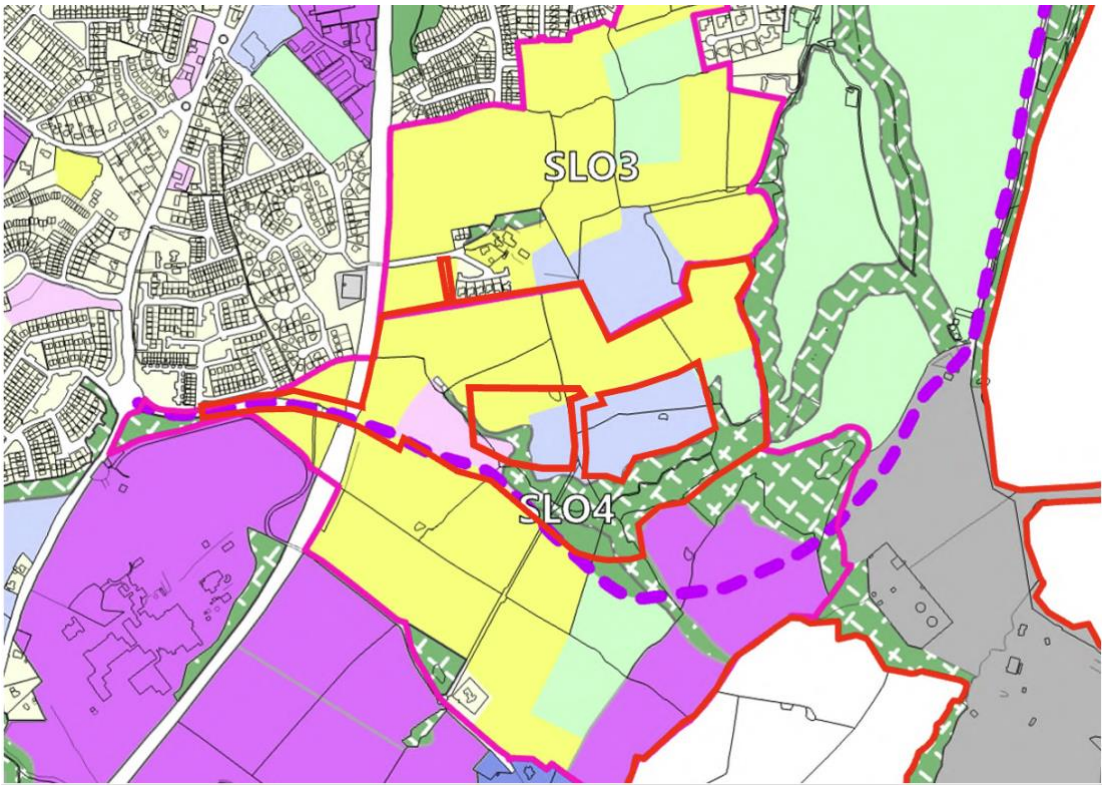


Figure 8: Extract of Arklow Local Planning Framework 2026 (SLA overlay outlines approximate application site area outlined in red). We refer the Planning Authority to the accompanying Site Location Map prepared by O'Mahony Pike Architects for the exact extent of the site area of the consented scheme and the location of the proposed amendments within this site.

Zoning objective **RN** seeks:

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

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

'Residential' is permissible use under the zoning RN which is the principle zoning objective for the application site.

Zoning objective **CE** seeks:

To provide for civic, community and educational facilities

Zoning objective **LSS** seeks:

To provide for small scale local neighbourhood shops and services

Zoning objective **OS1** seeks:

To protect and enhance existing public open space and provide for recreational open space.

Zoning objective **OS2** seeks:

To protect and enhance existing open, undeveloped lands.

The following objectives for the development of this SLO generally accord with the disposition of the various land uses across this residential-led mixed-use development permitted under Reg. Ref. 24/325.

The amendments retain the residential-led mixed-use framework of Reg. Ref. 24325 and do not introduce a new land-use category or extend development beyond the permitted red-line boundary. Residential development and its supporting facilities remain consistent in principle with the applicable RN zoning, while the school, community, neighbourhood and open-space components of the wider scheme are retained.

The subject lands form part of the wider Tinahisk/Moneylands growth area on the southern edge of Arklow. The parent permission established the acceptability of the disposition of the various land uses across this residential-led mixed-use development at this location and the proposed amendments do not prejudice the strategic development framework for the wider area.

The amendments do not extend the development lands, introduce a new land-use category or alter the principal access and infrastructure framework. Rather, they refine the permitted scheme to reflect updated housing typologies, revised phasing and accurate site-level information. The school reservation site, community uses, active recreation, open-space network and strategic road connections remain embedded within the overall development.

Figure B:10.11: SLO4 Concept Plan

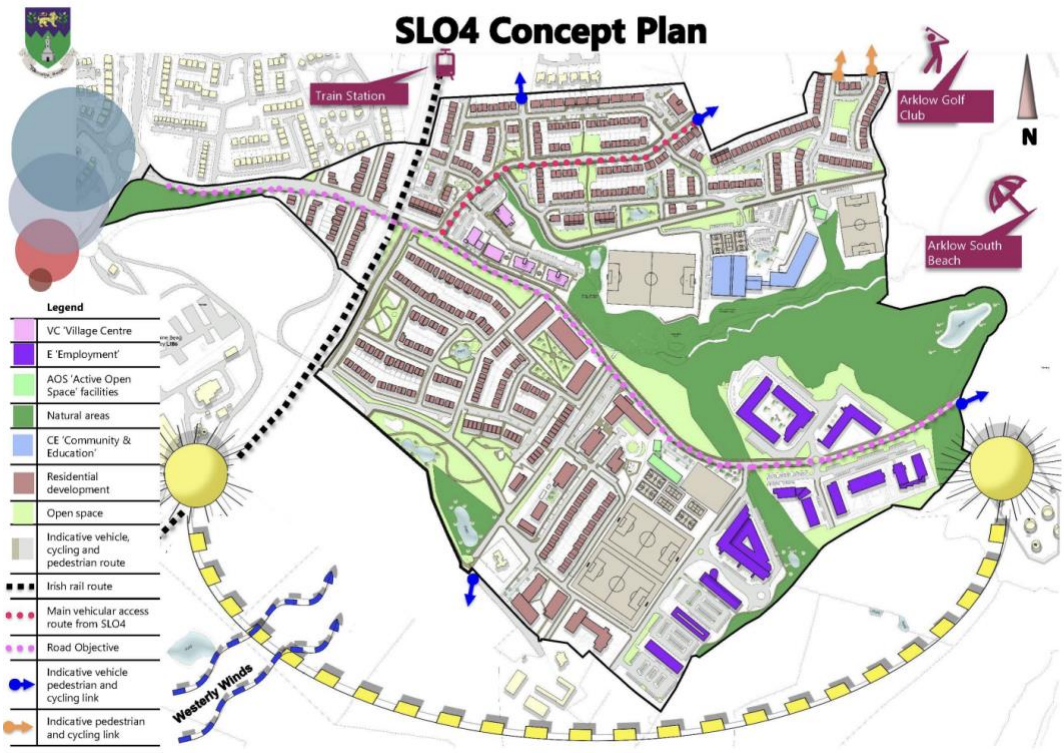


Figure 9: Extract of SLO4 Concept Plan from the Arklow Local Planning Framework.

It is acknowledged that the detail of the SLO4 Concept Plan and also land use zoning boundaries contained in the Arklow Framework Plan do not precisely align with what which had already been permitted under Reg. Ref. 24/325. However, the development permitted already under Reg. Ref. 24/325 is capable of being implemented and delivers upon the Objectives of the Local Planning Framework. In that regard, the proposed alterations in this case can be considered to be consistent with the proper planning and sustainable development of the area and substantially consistent with the objectives of the Arklow Local Planning Framework.

SLO 4 Tinahask Upper, Money Little &Money Big Objectives

- The development of this SLO shall be contingent on the provision of new road infrastructure which required to be located on the SLO4 lands, namely (a) the improvement of the access road from the Knockmore roundabout to the railway line and the improvement of the railway overbridge, (b) a new distributer road from the railway overbridge into SLO4, and through SLO4 into SLO3 to the north and (c) the development of the western part of the future Southern Port Access Road located within the SLO4 area.

  Such road provision and improvements shall be subject to detailed design and phasing, based on the quantum of development that is planned to occur in each phase of the development, subject to the proviso that no more **than 250 dwellings** may be occupied in SLO4 prior to
  - the improvement of the existing link road and railway bridge from the Knockmore roundabout leading into this area and
  - the full provision and operation of the new distributor road through this SLO which connects directly into SLO3 to the north.

- A minimum area of **4.5ha of Active Open Space (AOS)** shall be laid out for active sports uses in a range of track, pitch and court types suitable for a variety of sports, including necessary car parking, lighting and changing facilities. In this regard:
  - The AOS north of the SPAR shall be developed and operational upon occupation of 50% of any residential development on the RN lands north of the SPAR;
  - The AOS south of the SPAR shall be developed and operational upon occupation of 50% of any residential development on the RN lands south of the SPAR.

- **Open Space** shall be provided as part of residential developments in the area in accordance with County Development Plan standards and laid out as informal parks and walks. Within these areas, at least **3 equipped children's play areas** measuring **at least 0.2ha each** shall be provided in tandem with residential development; one to the north of the SPAR and two to the south. These play spaces shall be in the form of a playground and/or MUGA (Multi Use Games Area) and should cater for a variety of age groups including teenagers.

- A minimum of 4ha shall be reserved for the provision of schools (**CE Community and Education Zone**). **No more than 250 dwellings may be occupied** in this SLO until the CE lands have been transferred to the relevant authorities or otherwise made available for the provision of a school.

- **Local shops and services (LSS zone),** to service both the future resident and working population of the SLO area, of a scale that is commensurate with the needs of the future population shall be provided. This local centre shall comprise of:
  - a small group of shops including 1 medium size foodstore/ general grocery store (not a supermarket), and other such retail and non-retail services as shall be determined as warranted following the carrying out of a Retail Impact Assessment.
  - this local shops and services zone shall be permitted, constructed and operational, prior to the occupation of the final 25% of any residential development on the RN lands north of the SPAR and prior to the commencement of any development south of the SPAR.

- 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 150 units), each containing materially different house designs within an overall unified theme.

- 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.

Figure 10: Extract of SLO4 Objectives from the Arklow Local Planning Framework.

Specific Local Objective SLO4 - Tinahask Upper, Money Little and Money Big

SLO4 covers c.63.5 ha on the south side of Arklow and is planned as a mixed-use area comprising new residential, employment, local shops and services, community and education, active open space and other open-space lands. The LPF records the extant permission for 476 no. residential units and associated public open space, local shops/services, community and office space, childcare, railway bridge works and part of the Port Access Road.

SLO4 Infrastructure and Phasing

The LPF requires development of SLO4 to be tied to road infrastructure, including improvement of the access road and railway overbridge, a distributor road through SLO4 connecting to SLO3, and the western part of the future Southern Port Access Road. It further provides that no more than 250

dwellings may be occupied before the specified link-road/bridge improvements and distributor road are fully provided and operational.

Applicant's Response:

The amendment retains the strategic access and road framework of the parent permission and revises the delivery sequence rather than removing infrastructure obligations. The two-phase strategy will be implemented in a manner consistent with the applicable SLO4 occupation thresholds and infrastructure triggers.

SLO4 Social, Community and Open-Space Infrastructure

SLO4 requires a minimum 4.5 ha of Active Open Space, open space and equipped play areas delivered in tandem with residential development, a minimum 4 ha school reservation, and a local shops and services centre linked to residential phasing. It also requires identifiable and distinct housing estates not exceeding 150 units, with materially different house designs within an overall unified theme.

Applicant's Response:

The amended scheme retains the active recreation, school reservation site, neighbourhood centre and open-space framework of the parent permission in the same locations. The revised layout and architectural approach should be read with the Architectural Design Statement and landscape proposals, which address character areas, housing typologies and play/open-space provision.

9.2 Wicklow County Development Plan 2022-2028 (as varied)

The Wicklow County Development Plan 2022-2028 (as varied) provides the overarching statutory planning framework for the subject lands. The objectives most relevant to the proposed amendments are addressed below on a chapter-by-chapter basis.

9.3 Core Strategy

Core Strategy Objective 1: -

> *"All lands zoned for residential use, or mixed use of which residential use forms a component will be supported for the delivery of housing during the lifetime of the plan. In particular, both lands previously zoned Phase 1 / Priority 1 and Phase 2 / Priority 2 lands prior to the making of Variation No. 5 to this plan will be considered positively for permission during the lifetime of this plan, subject to the sustainable development objectives set out in this plan. The housing growth targets set out in this Core Strategy represent the minimum housing growth to be planned for and supported across the County and each individual settlement. "*

The proposed development provides 352no. dwellings, on zoned RN New Residential lands and contribute towards meeting the core strategy target for housing on appropriately zoned lands. The lands are within the existing built-up area of the settlement. Arklow is outlined as a self-sustaining growth town per map 3.1 of the Core Strategy Map of the CDP.

Core Strategy Objective 2: -

> *"Wicklow County Council will proactively engage with developers of sites with planning permission for housing to support the commencement and delivery of permitted housing development and assist in the unblocking of impediments where feasible."*

As noted above, the proposed development provides 352no. dwellings, on zoned land and will provide in tandem supporting infrastructure including roads, pumping station for later phases/capacity and active travel routes.

Table 3.5 of the CDP outlines Wicklow's Core Strategy for each town. Arklow is the largest level 3 town and is overall 3rd largest town in the county. Arklow is additionally a 'Tier 1 level 3 town' within the sub group. As can be seen in Figure 11, further growth required up to 2031 units indicates a total unit requirement of 2,881. This application assist Wicklow County Council in achieving their housing delivery obligations.

Level	Town	New housing target 2025-2031[13] (units)	Units under construction as of Q3 2025	Units permitted yet to be commenced	Units permitted but subject to current appeal / JR	Further growth required up to 2031 (units)	Amount of zoned land required to accommodate further growth up to 2031 (ha) [14]	Amount of zoned and serviced land available up to 2031 (ha) [15]
1	Bray	5,526	157	575	135	4,659	62	101
2	Wicklow - Rathnew	3,170	502	639	0	2,029	41	59
3	Arklow	3,793	58	854	0	2,881	67	99
	Greystones - Delgany	1,717	264	209	3	1,241	25	45
	Blessington	806	664	142	0	0	0	0

Figure 11: Wicklow Core Strategy Table 3.5

9.4 Climate Action

The Plan promotes sustainable settlement patterns, compact growth, sustainable transport, efficient water management, flood resilience, biodiversity and green infrastructure. The amended scheme retains the strategic movement and open-space framework of the parent permission and incorporates nature-based solutions and climate-responsive measures through the accompanying architectural, landscape and engineering proposals.

Housing

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."

The development is on zoned landed as noted earlier in this report.

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."*

The revised layout remains within the established development envelope and has been designed as an amendment to the permitted scheme, with residential amenity considered through the architectural, landscape and daylight/sunlight documentation. Nearest neighbours are well set back from the development and this has been demonstrated by way of BRE Daylight and Sunlight testing.

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)."*

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:

- *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."*

CPOs 6.4 and 6.5 require high-quality layout and design and a coherent, legible and permeable urban form. The revised layout retains the principal movement, open-space and infrastructure structure of the parent permission while increasing the proportion of own-door family housing and creating identifiable residential character areas.

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. "

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)."

The application is accompanied by an **Architectural Design Statement**, prepared by O'Mahony Pike Architects.. The amended layout maintains the distributor road and internal street hierarchy and provides pedestrian and cycle connections through the development, supporting permeability, active frontage and accessibility.

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)14."

Universal design has been incorporated into the amended scheme; the detailed provision should be read in conjunction with the Architectural Design Statement and Housing Quality Assessment, prepared by O'Mahony Pike Architects.

CPO 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."

Refer to the **Part V Masterplan**, prepared by O'Mahony Pike Architects.

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."

CPO 6.10

"To ensure the selection of lands or housing units to purchase or lease by the Council, including Part V, counteracts undue segregation by persons of different social backgrounds."

Refer to the **Part V Masterplan**, prepared by O'Mahony Pike Architects. Part V units are pepper potted across the site and provide for a range of unit types. Part V contribution will be finalised on the receipt of a final grant.

9.5 Density

CPO 6.13

"To require that new residential development represents an efficient use of land and achieves the densities as set out in the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DoHLGH 2024) - Table 6.1. In promoting higher densities and more compact development, new development should demonstrate compliance with:

- *the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (DoHLGH 2024);*
- *Quality Housing for Sustainable Communities;*
- *Design Standards for New Apartments Guidelines for Planning Authorities;*
- *Design Manual for Urban Roads and Streets; and any subsequent Ministerial guidelines."*

CPO 6.14

"To densify existing built-up areas subject to the adequate protection of existing residential amenities

CPO 6.15

"Higher density proposals should be designed to a high standard, incorporate a mix of housing types and sizes and deliver compact urban forms that enhance the local built environment and contribute towards a sustainable mix of housing options. Proposals should provide an appropriate design response to the site, be designed to a high quality and afford adequate protection for residential amenity of neighbouring properties."

CPO 6.16

> *"To encourage and facilitate high quality well-designed infill and brownfield development that is sensitive to context, enables consolidation of the built environment and enhances the streetscape. Where necessary, performance criteria should be prioritised provided that the layout achieves well- designed high quality outcomes and public safety is not compromised and the environment is suitably protected."*

The proposed amendments increase the overall residential yield by 23 no. units, from 476 no. units permitted under WCC Reg. Ref. 24/325 to 499 no. units across the revised two-phase development.

The Architectural Design Statement in chapter 3 outlines the net density of the scheme. The overall net density increase in marginal and within the allowable ranges contained within the Compact Settlement Guidelines for this metropolitan large town. The proposed residential density when viewed within the context of the extant permission Reg. Ref. 24/325 and the now proposed amendment results in a density of **40.8 units per hectare.** This is a marginal increase from the existing permission which yielded a density of 40 dwellings per hectare.

Net Residential Density Methodology

Appendix B of the Compact Settlement Guidelines provides that net residential density includes land developed for housing and directly associated uses, including local streets, residential parking, private and semi-private open space, local parks and incidental landscaping. Table 1 identifies exclusions, including major arterial and link streets, commercial development, schools and other community facilities, larger regional or district parks, and qualifying constrained lands. For mixed-use developments, the net site area is also reduced proportionately to reflect the percentage of non-residential gross floor area.

The below extract from the Architectural Design Report outlines how density has been calculated and accords with Appendix B of the Compact Settlement Guidelines to an overall density of 40.8 dwellings per hectare.

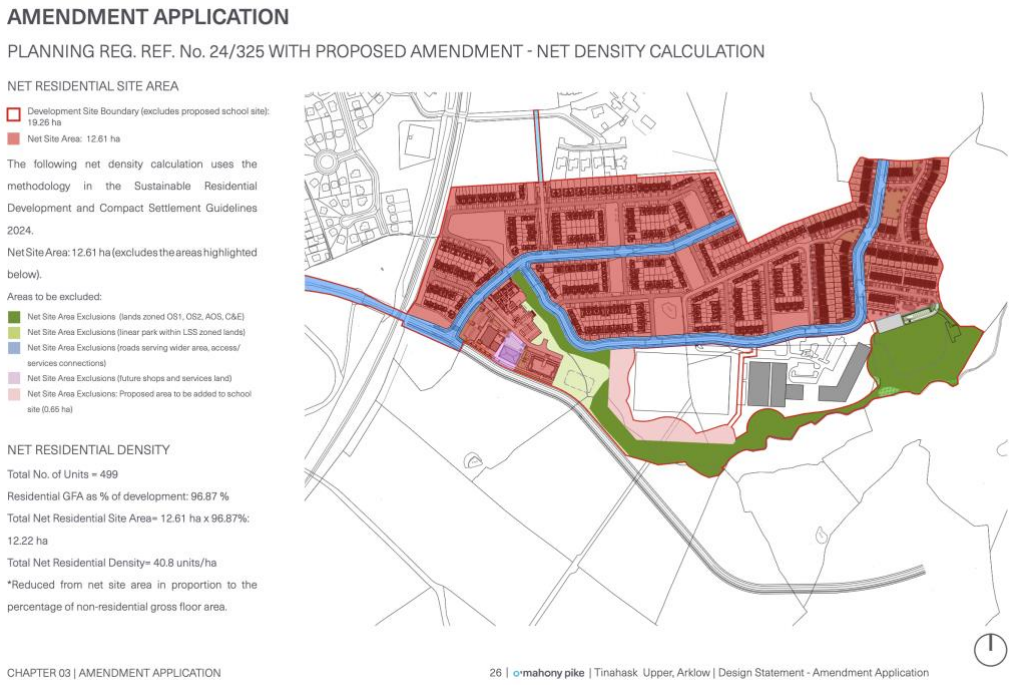


Figure 12: Planning Reg. Ref. No. 24/325 With Proposed Amendment - Net Density Calculation

Settlement Categorisation and Density Range

For the purposes of the Guidelines, Arklow falls within the Key Town / Large Town category, and the subject lands constitute a suburban / urban extension location. Table 3.5 generally supports net residential densities of 30–50 dph at such locations.

The calculated overall density of approximately 40.8 dph falls within this range. The proposed amendments therefore support the efficient use of residentially zoned land and a more compact development pattern, while building on the residential scheme permitted under WCC Reg. Ref. 24/325.

The site's relationship with Arklow Train Station, existing bus services and proposed pedestrian and cycle connections provides further context for assessing the proposed density. Any classification of the site as an Intermediate accessibility location should be supported by the walking-distance and service-frequency criteria set out in Table 3.8.

(ii) Table 3.5 - Areas and Density Ranges Key Towns and Large Towns (5,000+ population)[10]

Key Town / Large Town - Centre and Urban Neighbourhood

The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.

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).

Figure 13: Extract from Table 3.5 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024), identifying the density range for Key Town / Large Town suburban and urban extension locations.

9.6 Height and Scale

CPO 6.17

"To facilitate development incorporating higher buildings (i.e. buildings that exceed the contextual prevailing height) where it has been adequately demonstrated that the development complies with the assessment criteria set out in Section 3.2 of the Urban Development and Building Heights Guidelines for Planning Authorities or any subsequent height guidelines. In accordance with the SPPR 3 of Urban Development and Building Heights Guidelines, where:

- *an applicant for planning permission sets out how a development proposal complies with the Urban Development and Building Heights Guidelines, particularly SSPR1 and SPPR2 thereof; and*
- *the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the NPF and 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.

In accordance with the SPPR 1 of Urban Development and Building Heights Guidelines, Planning Authorities are required explicitly identify areas where increased building height will be actively pursued for redevelopment, regeneration and infill development to secure the objectives of the NPF and RSES. In this regard, the identification of locations for increased building height shall be carried out in the preparation of Local Area Plans for settlements in Tiers 1-3 of the County

Settlement Hierarchy as these are deemed the only settlements of sufficient scale and diversity in urban grain to accommodate such increases in height."

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:

- *The immediate & surrounding environment - streetscape, historic character;*
- *Adjoining structures;*
- *Open spaces and public realm;*
- *Views and Vistas."*

The amendments do not materially increase the building-height parameters established by the parent permission. The revised built form remains predominantly 2-3 storeys and responds to the established scale and character of the permitted scheme. Whilst a 4 storey building is proposed as part of Block A and the creche building, this has been strategically located within the Local Shops and Services zoning by way of the apartment block in a total height of 4 storeys with creche located at ground floor. This minor change, aids place making with the LSS zoned lands and provides a mixed use building within this area. The building of marginal height will provide clear place making and help identify the creche at ground floor for visitors. This increase in height is strategically located closest to the connection to Arklow train station to the west and will be the most accessible sections of the site, adjacent the indicative bus route "A" immediately to the south. In line with SLO4 this variation will help achieve a sense of place and allow for visual diversity with a materiality palette which complements the wider development in a cohesive manner.

Figure 14: CGI 1 Prepared by Digital Dimensions. Note place and way making feature of apartment building whilst ensuring it integrates into the wider development.

9.7 Sequence / Phasing of Housing

CPO 6.19

"The development of zoned land should generally be phased in accordance with the sequential approach as set out in this chapter. The Council reserves the right to refuse permission for any development that is not consistent with these principles."

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.

New significant residential or mixed use development proposals (of which residential development forms a component)3 , 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 and sports 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."

We additionally refer the Planning Authority to the **Mobility Management Plan** prepared by Waterman Moylan Consulting Engineering Limited which outlines how the needs of future residents will be provided for and avoid undue reliance on the private car.

We additionally note a Community and Social Infrastructure Audit report was prepared to support the parent permission. As no amendments are being sought to non-residential areas save for the creche building, the previous report remains per the approved file.

A **Phasing plan** has been provided which splits the development into 2 construction phases. Phase one will see required infrastructure along with the creche facility.

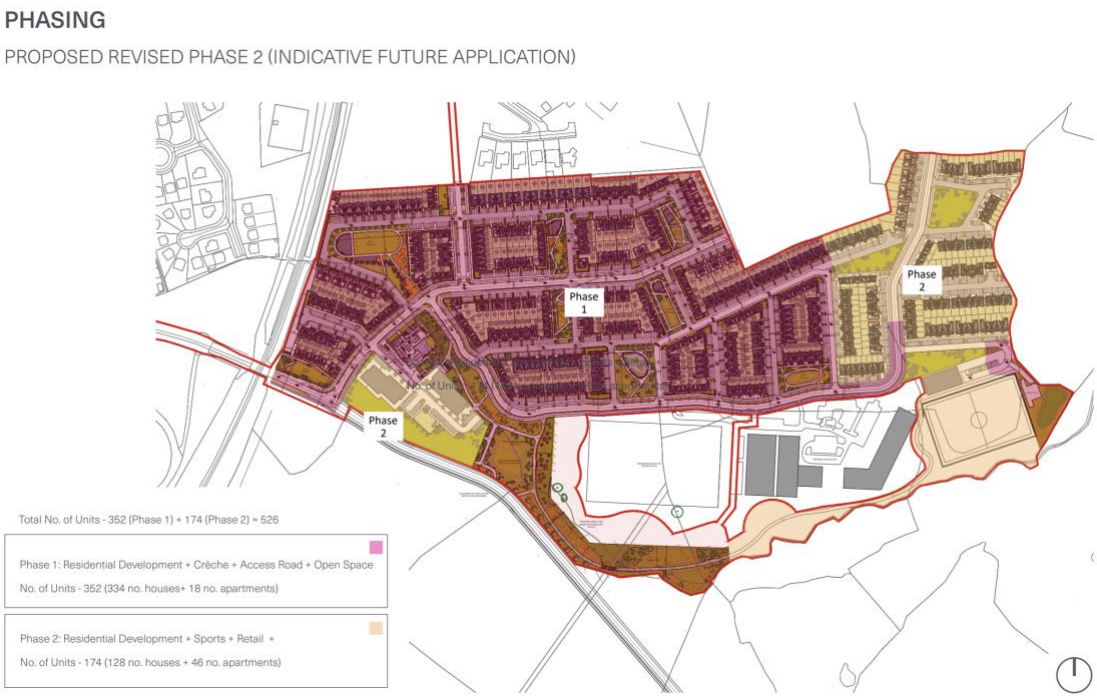


Figure 15: Phasing proposed across the lands. Note Phase 1 includes POS, Access Road, Creche in tandem with 352 residential units subject to this amendment scheme.

9.8 Childcare

CPO 7.27

> *"To facilitate the provision of childcare in a manner, which is compatible with land-use and transportation policies and adheres to the principles of sustainable development."*

CPO 7.29

> *"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."*

A creche at ground floor of apartment block A (711sqm) is provided with a capacity of 135 childcare spaces. This includes an area of 294 sq/m for outdoor play. In line with the above referenced objectives, the development will provide for childcare needs generated from the development with delivery within Phase 1. We additionally refer the Planning Authority to the **Architectural Design Statement**, prepared by O'Mahony Pike Architects.

9.9 Retention of Natural Features

CPO 7.35

> *"Subject to safety considerations, natural features (trees, streams etc) shall be retained in new developments."*

The landscape strategy seeks to retain and integrate natural features where practicable and should be read with the accompanying landscape and ecological documentation.

9.10 Multi-Use Games Area

CPO 7.37

> *"All-new neighbourhood parks or active open space zones shall include a 'mixed-use games area' (MUGA) of an appropriate size and nature to be determined in, pre-consultation with the Community, Cultural & Social Development Office of Wicklow County Council."*

CPO 7.37 requires new neighbourhood parks or active open-space zones to include an appropriately sized MUGA. This is particularly relevant to the SLO4 requirement for equipped play areas and was also raised by the Planning Authority at pre-planning stage.

We refer to the **Landscape drawing including Masterplan**, prepared by Doyle & O'Troithigh Landscape Architects which demonstrate the location and delivery of the required play/MUGA facilities.

9.11 Open Space

CPO 7.45

> *"Through the local plan process, to designate suitable open space & covered open space in all settlements, commensurate with its needs and existing facilities, in accordance with the provisions of the Wicklow County Council Play, Sport & Recreation and Active Open Space policies."*

CPO 7.46

> *"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)."*

Hard and soft landscaping treatment works being proposed include amendments to public open space involving 9 local parks totalling 11,957sqm. The linear public open space park measures a total of 13,885sqm. Total of 25,842sqm.

We refer the Planning Authority to **Landscape drawing including Masterplan**, prepared by Doyle & O'Troithigh Landscape Architects and **Public Open Space Schedule** prepared by O'Mahony Pike Architects.

CPO 7.49

> *"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."*

The open-space and landscape strategy incorporates biodiversity and nature-based measures and should be read in conjunction with the **Landscape Design** Report, prepared by Doyle & O'Troithigh Landscape Architects and **Ecological Impact Assessment**, prepared by Altemar.

9.12 Sustainable Transport

CPO 12.7

> *"To facilitate the development of services and utilities for electric vehicles and alternative fuel vehicles types, including the roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations."*

CPO 12.8

"To require the implementation of the following standards for EV charging in new developments:

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.
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.

Figure 16: Extract from CPO 12.8 Wicklow CDP

In line with the above requirement, we refer the Planning Authority to the **Parking Schedule** prepared by prepared by O'Mahony Pike Architects. This confirms 391 EV ready spaces for the houses along with other spaces ducting is provided for. The apartments have 2 EV ready spaces and 12 no spaces with ducting. The creche features 2 EV ready spaces and other 24 spaces EV ready with suitable ducting.

CPO 12.11

"To improve existing or provide new pedestrian and cycling infrastructure of the highest standards on existing public roads, as funding and site constraints allow."

CPO 12.12

"To require all new or improved roads 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) and public lighting as deemed appropriate by the Local Authority."

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."

CPO 12.18

"To facilitate the development of services and utilities for electric bikes."

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 amendments incorporate pedestrian and cycle infrastructure within the revised street layout, supporting permeability through the development and connections to the surrounding area.

These connections facilitate access to public transport, schools, local services and amenities, consistent with CPO 12.11 and CPO 12.13.

The accompanying **engineering drawings** and **DMURS Statement of Consistency**, prepared by Waterman Moylan Consulting Engineers, detail the proposed road layout and associated pedestrian and cycle provision.

A total of 52 no. bicycle parking spaces are proposed, comprising 30 no. resident spaces, 10 no. public/visitor spaces and 12 no. spaces serving the childcare facility. Housing units can store bikes safely in rear gardens per the arrangements agreed previously under the extant permission.

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. 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 (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. 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."*

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."*

CPO 12.58

> *"Provision shall be made for off street loading / unloading facilities in all new / expanded developments which are to receive regular deliveries."*

A total of 623no. car parking spaces are proposed comprising 391 for houses (on-curtilage), 118 for houses (off-curtilage), 73 for houses (unallocated and visitors, including 4 accessible) resulting in a ratio of 1.7 per housing unit. Apartment parking includes 10 spaces allocated, 3 visitor including 1 accessible resulting in a parking ratio of 0.8 per apartment. 2 spaces are dedicated as shared 'Go Car' spaces whilst 26 spaces are allocated to the creche, 1 space which is accessible.

We refer the Planning Authority to the enclosed **Traffic and Transportation Statement**, prepared by Waterman Moylan Consulting Engineers and **Parking Schedule**, prepared by O'Mahony Pike Architects for further detail.

Proposed Car Parking Spaces			
Unit Type	No. of units	Ratio	Total
Houses	334	1.7	**582**
Apartments	18	0.8	**15**
Childcare Facilities	714 sqm		**26**
Total			**623**

Figure 17: Extract of Table 19 Car Parking Provision Proposed, Traffic & Transportation Report, prepared by Waterman Moylan Consulting Engineers.

9.13 Water Services

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."

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:

- *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."*

A connection application was issued by Uisce Eireann on 26 June 2026. A Confirmation of Feasibility was issued by Uisce Eireann confirming that a to water was feasible subject to upgrades and a connection to wastewater was feasible without infrastructure upgrades by Uisce Eireann. A copy of this CoF can be viewed in Waterman Moylan Consulting Engineers Engineering Assessment Report, Appendix A.

9.14 Storm and Surface Water

CPO 13.20

"Ensure the separation of foul and surface water discharges in new developments through the provision of separate networks."

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."

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 proposed development provides separate foul and surface water drainage networks, as detailed in the accompanying Engineering Assessment Report and drainage drawings prepared by Waterman Moylan Consulting Engineers.

The surface water strategy incorporates a SuDS management train comprising permeable paving, bio-retention tree pits, rain gardens, roadside swales, vegetated attenuation basins and petrol interceptors.

9.15 Flood Risk Management

CPO 14.06

"To implement the 'Guidelines on the Planning System and Flood Risk Management' (DoEHLG/OPW, 2009)."

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."

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."

The accompanying **Flood Risk Assessment**, prepared by Waterman Moylan Consulting Engineers has been prepared in accordance with The Planning System and Flood Risk Management Guidelines (2009). It identifies the site within Flood Zone C and concludes that a Justification Test is not required. The assessment considers coastal, fluvial, pluvial and groundwater flooding, and concludes that residual risks are low or very low following the identified mitigation measures.

The drainage strategy incorporates permeable paving, bio-retention tree pits, rain gardens, roadside swales and vegetated attenuation basins, supported by flow controls and pollution treatment. These measures address water quality and quantity while contributing to landscape amenity and biodiversity.

The **Engineering Assessment Report**, prepared by Waterman Moylan Consulting Engineers identifies vegetated detention basins as the proposed attenuation solution, prioritising surface-based SuDS over underground storage.

We refer to the drainage drawings, prepared by Waterman Moylan Consulting Engineers.

9.16 Waste and Emissions

CPO 15.1

"To require all developments likely to give rise to significant quantities of waste, either by virtue of the scale of the development or the nature of the development (e.g. one that involves demolition) to submit a construction management plan, which will outline, amongst other things, the plan to minimise waste generation and the plan to protect the environment with the safe and efficient disposal of waste from the site."

CPO 15.2

"To require all new developments, whether residential, community, agricultural or commercial to make provision for storage and recycling facilities (in accordance with the standards set out in Development & Design Standards of this plan)."

CPO 15.15

"To require proposals for new developments with the potential to create excessive noise to prepare a construction and/or operation management plans to control such emissions."

CPO 15.16

"To require activities likely to give rise to excessive noise to install noise mitigation measures to undertake noise monitoring and to provide an annual monitoring audit."

CPO 15.17

"To ensure that all external lighting whether free standing or attached to a building shall be designed and constructed so as not to cause excessive light spillage, glare, or dazzle motorists, and thereby limiting light pollution into the surrounding environment and protecting the amenities of nearby properties, traffic and wildlife."

CPO 15.18

"To require proposals for new developments with the potential to create light pollution or light impacts on adjacent residences to mitigate impacts, in accordance with the Development & Design Standards set out in this plan. "

CPO 15.19

"To promote the use of low energy LED (or equivalent) lighting."

We refer to the **Resource Waste Management Plan**, prepared by AWN Consulting which sets out measures to minimise waste generation, maximise segregation, reuse and recycling, and ensure that residual waste is managed by authorised contractors and facilities.

We refer to the **Operational Waste Management Plan**, prepared by AWN Consulting which includes provision is made for waste storage and segregation for the houses, apartments and childcare facility, with collection arrangements.

Construction noise will be managed through appropriate working hours, plant selection and maintenance, and mitigation measures where required. Noise monitoring will be undertaken where necessary to assess the effectiveness of these measures. Any activities likely to generate excessive noise will be subject to appropriate controls and the monitoring and audit requirements of the Planning Authority.

We refer to the **Outdoor Lighting report and drawings**, prepared by Sabre Electrical Services Limited which demonstrates external lighting is designed to provide safe illumination while minimising light spill, glare and impacts on neighbouring properties, road users and wildlife. The detailed specification incorporate appropriately directed, low-energy LED luminaires and suitable controls, having regard to the Council's Development and Design Standards and the accompanying ecological recommendations.

We additionally refer to the **Acoustic Design Statement** prepared by Wave Dynamics which considers nearby noise including the railway tracks to the west of the site.

9.17 Sustainable Energy Communities

CPO 16.03

"To support and promote the development of 'Sustainable Energy Communities' and in particular to encourage and facilitate developments that are energy neutral / low emission, integrate renewable energy technology or involve local renewable energy production."

CPO 16.09

"To positively consider all applications for the installation of building mounted PV cells at all locations, having due regard to architectural amenity and heritage."

CPO 16.30

"To facilitate the development of services and utilities for electric vehicles and other low emission alternative vehicles / fuel types, including the roll-out of additional electric charging points and alternative fuel distribution infrastructure in collaboration with relevant agencies at appropriate locations. "

CPO 16.31

"To require the provision of EV charging points in new developments as follows:

Building type		Requirement
New buildings and buildings undergoing major renovation	Non-residential buildings with more than 10 parking spaces within property boundary.	Installation of at least 1 recharging point. Installation of ducting infrastructure for at least 1 in 5 parking spaces.
	Residential multi-unit buildings.	Installation of 1 recharging point for every 10 car parking spaces (with a minimum 1 for developments under 10 spaces) Installation of ducting infrastructure for every parking space within property boundary.
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.

Figure 18: Extract from CPO 16.31 of the Wicklow CDP

The proposed development will incorporate energy-efficient building fabric and services, with renewable energy measures informed by the accompanying **Energy Efficiency & Climate Change Adaptation Design Statement**, prepared by TEM Consulting.

9.18 Natural Heritage and Biodiversity

CPO 17.1

"To protect, sustainably manage and enhance the natural heritage, biodiversity, geological heritage, landscape and environment of County Wicklow in recognition of its importance for nature conservation and biodiversity and as a non-renewable resource."

CPO 17.2

"Ensure the protection of ecosystems and ecosystem services by integrating full consideration of these into all decision making."

CPO 17.12

"To protect non-designated sites from inappropriate development, ensuring that ecological impact assessment is carried out for any proposed development likely to have a significant impact on locally important natural habitats, species or wildlife corridors. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment."

CPO 17.14

"Ensure that development proposals support the protection and enhancement of biodiversity and ecological connectivity within the plan area in accordance with Article 10 of the Habitats Directive, including linear landscape features like watercourses (rivers, streams, canals, ponds, drainage channels, etc), woodlands, trees, hedgerows, road and railway margins, semi-natural grasslands, natural springs, wetlands, stonewalls, geological and geo-morphological systems, features which act as stepping stones, such as marshes and woodlands, other landscape features and associated wildlife where these form part of the ecological network and/or may be considered as ecological corridors or stepping stones that taken as a whole help to improve the coherence of the European network in Wicklow."

CPO 17.16

"Require pollinator friendly landscape management and planting within new developments and on Council owned land."

CPO 17.18

"To promote the preservation of trees, groups of trees or woodlands in particular native tree species, and those trees associated with demesne planting, in the interest of the long-term sustainability of a stable ecosystem amenity or the environment generally, as set out in Schedule 17.05 and Maps 17.05 and 17.05A - H of this plan."

CPO 17.22

"To require and ensure the preservation and enhancement of native and semi-natural woodlands, groups of trees and individual trees, as part of the development management process, and require the planting of native broad leaved species, and species of local provenance in all new developments."

CPO 17.23

"To require the retention, wherever possible, of hedgerows and other distinctive boundary treatment in the County. Where removal of a hedgerow, stone wall or other distinctive boundary treatment is unavoidable, provision of the same type of boundary will be required of similar length and set back within the site in advance of the commencement of construction works on the site (unless otherwise agreed by the Planning Authority)."

The proposed amendments are informed by the accompanying **Ecological Impact Assessment**, prepared by Altemar and **landscape drawings**, prepared by Doyle & O'Troithigh Landscape Architects, which address the protection of habitats, species and ecological connectivity.

The proposed development integrates open spaces, planting and SuDS features, including the retained southern boundary drainage ditch, to support ecological connections through the site. These features provide opportunities to maintain wildlife corridors and enhance habitat value.

Existing trees and hedgerows will be retained and protected wherever practicable. Where removal is unavoidable, replacement planting and boundary treatments will be detailed in the **landscape report**, prepared by Doyle & O'Troithigh Landscape Architects. New planting will prioritise native species and species of local provenance.

Pollinator-friendly planting and landscape management will be incorporated through suitable flowering species and management practices that support seasonal food sources and habitats.

9.19 Landscape, Views and Prospects

CPO 17.35

"All development proposals shall have regard to the County landscape classification hierarchy in particular the key landscape features and characteristics identified in the Wicklow Landscape Assessment (set in Volume 3 of the 2016 County Development Plan) and the 'Key Development Considerations' set out for each landscape area set out in Section 5 of the Wicklow Landscape Assessment."

The proposed amendments have regard to the County landscape classification hierarchy and the relevant landscape characteristics and Key Development Considerations identified in the Wicklow Landscape Assessment. The revised layout, building heights, site levels and landscape proposals respond to the site's topography and its relationship with adjoining development and open lands.

9.20 Green Infrastructure

CPO 18.3

"New development and redevelopment proposals shall wherever possible, integrate nature based solutions to the design, layout and landscaping of development proposals, and in particular to the delivery of linear parks and connected open spaces along watercourses in order to enhance the existing green infrastructure of the local area. All such proposals will be subject to ecological impact assessment."

CPO 18.8

> *"To require the integration of Green Infrastructure principles and inclusion of native planting schemes in all development proposals in landscaped areas, open spaces and areas of public space."*

The proposed amendments integrate green infrastructure through coordinated landscape, open space and drainage proposals. Nature-based SuDS measures, including rain gardens, bio-retention tree pits, swales and vegetated attenuation basins, combine surface water management with opportunities for habitat creation and landscape enhancement.

The linear park and connected open spaces along the southern boundary drainage corridor support ecological connectivity and reinforce the site's green infrastructure. These proposals are to be read alongside the accompanying ecological assessment and its avoidance, mitigation and enhancement measures.

Native planting will form part of the landscape scheme within open spaces, public areas and landscaped boundaries, supporting biodiversity and integrating the development into its surroundings.

10 ENVIRONMENTAL IMPACT ASSESSMENT

10.1 Appropriate Assessment Screening

An **Appropriate Assessment Screening report** prepared by the consulting project ecologist Altemar supports this application. This report generally concludes:

> *"The proposed development site is located within a suburban agricultural environment. The nearest European site is the Kilpatrick Sandhills SAC (4.9km). The nearest watercourse flows through the western portion of the subject site and continues along the southern boundary and ultimately discharges to the Irish Sea through lands associated with Arklow Golf Club. Foul wastewater will be directed to the Arklow Wastewater Treatment Plant (WWTP) which underwent construction and became fully operational in early 2025. Foul wastewater drainage will ultimately be treated along this public network and will not significantly impact on the qualifying interests of European sites. Surface water drainage from the proposed development will be discharged to the onsite watercourse (Kilmurray Stream) which flows a short distance to the marine environment at Tinahask Lower Bay Beach (approx. 300m). There are two Natura 2000 sites within 10km of this outfall, namely Kilpatrick Sandhills SAC and Buckroney-Brittas Dunes and Fen SAC and thus a weak indirect hydrological pathway exists. However, given the minimum distance from the proposed development site to these European Sites (4.9km and 6.1km respectively), the scale of the proposed development, and the fact that surface water drainage will be directed to an existing public surface water network, any pollutants, dust or silt laden run off will be dispersed, diluted, and ultimately settle within the surface water drainage network, Kilmurray Stream and substantial marine environment at Tinahask Bay. In the absence of mitigation, no significant effects on European sites are likely. No specific mitigation is required to prevent impacts on Natura 2000 sites.*
>
> *Moreover, given the minimum distance from the proposed development site any pollutants, silt laden run off or dust that enters the surface or foul water network, would be treated, diluted or dispersed to negligible levels, prior to reaching any European sites.*
>
> *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."*

10.2 EIA Screening

As noted under the extant permission, the scheme is less than 500 units and is less than 20Ha. The Council Planners Report on Reg. Ref. 24/325 concludes, as per section 172(1)(b) of the Planning and Development Act 2000, that: -

Overall, having regard to the nature and scale of the proposed development, which is below the thresholds set out in Class 10 of Part 2 of Schedule 5, the criteria in Schedule 7, the information provided in accordance with Schedule 7A of the Planning and Development Regulations 2001, as amended, and the following:

- The scale, nature and location of the proposed impacts
- The potential impacts and proposed mitigation measures
- The results of the any other relevant assessments of the effects on the environment

It is considered that the proposed development would not be likely to have significant effects on the environment and that the preparation and submission of an environmental impact assessment report is not therefore required.

Figure 19: Extract from the parent consent Planners Report prepared by Wicklow County Council

An **Environmental Impact Assessment Screening Report**, prepared by Stephen Little & Associates accompanies this application. The Report confirms the following: -

> *"a) the nature and scale of the proposed development, on zoned lands served by public infrastructure,*
> *b) the absence of any significant environmental sensitivities in the area,*
> *c) the location of the development outside of any sensitive location specified in article 109(3) of the Planning and Development Regulations 2001 (as amended), and to the limited nature and extent of the proposed development is not considered likely to result in any long-term significant impacts on its surrounding environment. "*

The need for Environmental Impact Assessment can, in our professional opinion, be excluded given the development site is less than 20HA in size, is below 500 dwellings and amounts to a very small Extension to an already permitted development. This aligns with the previous determination by Wicklow County Council under the parent consent, as demonstrated in Figure 19 above. As such, we refer the Planning Authority to the EIAR Screening Statement for further information. We recognise that the Planning Authority is the competent authority to determine the matter.

11 CONCLUSION

This Planning Application Report has been prepared in support of amendments to the Large-Scale Residential Development permitted under Wicklow County Council Reg. Ref. 24325 at Tinahask Upper, Money Big and Money Little, Arklow.

The amended scheme provides 499 no. residential units across two phases, including a Revised Phase 1 of 352 no. units, together with the retained childcare and remaining Phase 2 with neighbourhood, community, school reservation site, recreation, open-space, road, active-travel and engineering infrastructure required to support the development. The proposal also incorporates localised level refinements necessary to reflect existing site conditions and facilitate a coherent accessibility and drainage strategy.

The amendments retain the fundamental development concept and infrastructure-led planning strategy established by the parent permission. Importantly, the parent application was subject to detailed assessment and Further Information on transport, railway bridge works, road levels, drainage, site levels, neighbourhood facilities, archaeology, universal design and boundary treatments. The current proposal builds on that assessed baseline while responding to updated topographical information and delivery requirements. It provides a modest increase in housing delivery, an increased proportion of own-door homes, earlier childcare provision and a simplified two-phase programme without undermining the strategic infrastructure, community facilities or open-space framework already accepted by Wicklow County Council. On this basis, the amendments are considered consistent with the proper planning and sustainable development of the area.

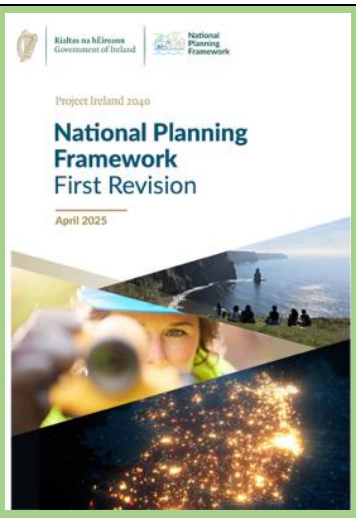
12 ENCLOSURES

The following items are included with this submission: -

1. Cover Letter, prepared by Stephen Little & Associates.
2. LRD Planning Application Form 19.
3. Proof of Payment.
4. Newspaper Notice.
5. Site Notice.
6. Applicant Consent to Agent Letter.
7. Michael Byrne Letter of Consent
8. Ginpole Holdings Unlimited Company Letter of Consent
9. Confirmation of Feasibility from Uisce Eireann dated 26 June 2026 (Appendix A of Engineering Assessment Report).
10. Part V Costings Letter.
11. Part V Validation Letter.
12. Planning Application and Statement of Consistency Report, prepared by Stephen Little & Associates.
13. Environmental Impact Assessment Screening Statement, prepared by Stephen Little & Associates.
14. Architectural Drawings, prepared by O'Mahony Pike Architects (refer to enclosed drawing schedule).
15. Architectural Design Statement, prepared by O'Mahony Pike Architects.
16. Housing Quality Assessment, prepared by O'Mahony Pike Architects.
17. Schedule of Accommodation, prepared by O'Mahony Pike Architects.
18. Summary Schedule, prepared by O'Mahony Pike Architects.
19. Parking Schedule, prepared by O'Mahony Pike Architects.
20. POS Schedule, prepared by O'Mahony Pike Architects.
21. Engineering Drawings, prepared by Waterman Moylan Consulting Engineers (refer to enclosed drawing schedule).
22. Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers.
23. Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers.
24. Traffic and Transport Assessment, prepared by Waterman Moylan Consulting Engineers.
25. Road Safety Audit Stage 1, prepared by Waterman Moylan Consulting Engineers.
26. Mobility Management Plan, prepared by Waterman Moylan Consulting Engineers.
27. Construction Waste Management Plan, prepared by Waterman Moylan Consulting Engineers.
28. DMURS Statement of Consistency, prepared by Waterman Moylan Consulting Engineers.
29. Preliminary Construction Environmental Management Plan, prepared by Waterman Moylan Consulting Engineers.
30. Construction Environmental Management Plan, prepared by AWN Consulting.
31. Resource Waste Management Plan, prepared by AWN Consulting.
32. Operational Waste Management Plan, prepared by AWN Consulting.
33. Acoustic Design Statement, prepared by Wave Dynamics

34. Landscape Drawings, prepared by Doyle & O'Troithigh Landscape Architects (refer to enclosed drawing schedule).
35. Landscape Design Report, prepared by Doyle & O'Troithigh Landscape Architects
36. Outdoor Lighting Report, prepared by Sabre Electrical Services Ltd
37. SES 09726 Sheet 1 Public Lighting Layout, prepared by Sabre Electrical Services Ltd
38. SES 09726 Sheet 2 Public Lighting Layout, prepared by Sabre Electrical Services Ltd
39. Appropriate Assessment Screening Report, prepared by Altemar
40. Ecological Impact Assessment Report, prepared by Altemar
41. Archaeological Impact Assessment with Test Trenching, prepared by DeFaoite Archaeology.
42. Daylight & Sunlight Assessments Report, prepared by Digital Dimensions.
43. CGIs, prepared by Digital Dimensions
44. Arboricultural Report, prepared by Arborist Associates
45. Arboricultural Drawings, prepared by Arborists Associates (refer to enclosed drawing schedule).
46. Energy Efficiency & Climate Change Adaptation Design Statement, prepared by TEM Consulting
47. Building Lifecycle Report, prepared by Castlethorn

13 APPENDIX A – STATEMENT OF CONSISTENCY

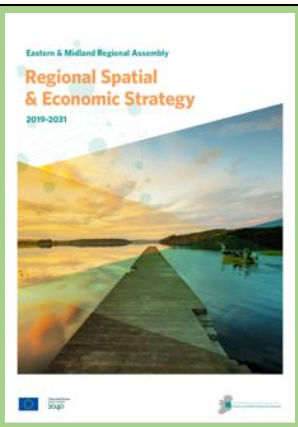
National Planning Framework – Ireland 2040 **First Revision April 2025**		*The NPF marks a shift away from allowing urban sprawl, to a more urban public transport focused development that will deliver a far denser compact urban form.* *This means encouraging more people, jobs and activity generally within our existing urban areas, rather than mainly 'greenfield' development and requires a change in outlook. In particular, it requires well-designed, high-quality development that can encourage more people, and generate more jobs and activity within existing cities, towns and villages.*

Chapter 2: A New Way Forward	
National Planning Objective 1 Ensure that all plans, projects and activities requiring consent arising from the National Planning framework are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	**Applicant's Response** The proposed amendments have been subject to the appropriate environmental assessment and screening processes. The application is accompanied by the Appropriate Assessment Screening Report and Ecological Impact Assessment Report, prepared by Altemar, which assesses the potential effects of the amendments having regard to the characteristics of the permitted development and the receiving environment.
National Policy Objective 7 Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.	**Applicant's Response** The proposal supports the NPF objective of compact and sequential settlement growth by delivering residential development on appropriately zoned lands within the established development framework for Arklow. The amendments optimise the use of serviced and serviceable lands while retaining the overall structure and infrastructure-led approach established under the parent permission.
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.	**Applicant's Response** The proposed development supports compact and sequential growth in Arklow through the delivery of housing on lands identified for residential development within the statutory planning framework. The proposal forms part of the planned expansion of Arklow and is supported by the delivery of associated transport, active-travel, open-space and community infrastructure.
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.	**Applicant's Response** NPO 10 is principally directed towards Transport Orientated Development at scale within or adjacent to the five cities or metropolitan towns and is therefore not directly applicable to Arklow. Notwithstanding this, the amendments support integrated land-use and transport planning by retaining the permitted active-travel and strategic road framework and facilitating connections to Arklow's wider walking, cycling, rail and bus networks.

Chapter 4: Making Stronger Urban Places	
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.	**Applicant's Response** The amendments retain the overall urban design and placemaking principles established by the parent permission, including a legible street hierarchy, high-quality public open spaces, active frontages and pedestrian and cycle connections. The revised residential layout continues to provide a coherent and attractive neighbourhood capable of supporting a diverse and sustainable community. We refer the Planning Authority to Site Layout plan prepared by OMP Architects.
National Policy Objective 14 Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.	**Applicant's Response** The proposal contributes to the sustainable growth and rejuvenation of Arklow through the delivery of new homes and supporting infrastructure on appropriately zoned lands. The amendments retain the wider mixed-use, community, recreational and infrastructural framework established for the lands and support the planned consolidation and expansion of the settlement. We refer the Planning Authority to Masterplan prepared by OMP Architects.
National Policy Objective 20 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.	**Applicant's Response** The proposal will facilitate additional population and activity within Arklow on lands specifically identified for development. The amendments optimise the residential capacity of the lands while maintaining appropriate planning, design and residential amenity standards and the wider infrastructure necessary to support sustainable growth. The wider parent consent includes commercial use which will generate business and jobs located adjacent planning residential development.
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.	**Applicant's Response** The amended scheme has been designed having regard to performance-based planning and design criteria, including residential amenity, building form, accessibility, open space, movement and placemaking. The proposed scale and form of development are considered appropriate to the site and its planned role within the wider SLO4 development area set out in the Arklow Local Planning Framework.
Chapter 6: People, Homes and Communities	
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.	**Applicant's Response** The amendments retain and reinforce the permitted walking and cycling framework, including connections through the development and to the wider active-travel network. The street and open-space network prioritises permeability, pedestrian and cyclist safety and convenient access to residential, community, recreational and local-service uses. We refer the Planning Authority to Site Layout plan prepared by OMP Architects.

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.	**Applicant's Response** The wider development provides for supporting social infrastructure alongside residential development, including childcare and lands for educational use. These facilities are integrated with the wider open-space, active-travel and movement network and are retained as part of the amended two-phase development strategy.
National Policy Objective 42 To target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040	**Applicant's Response** The proposed amendments support increased national housing delivery through the provision of 499 no. residential units across two phases, including 352 no. units within Revised Phase 1, on appropriately zoned and planned residential lands in Arklow.
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.	**Applicant's Response** The subject lands are appropriately zoned for residential development and form part of the planned expansion of Arklow. The scale of development is appropriate to the settlement and is supported by existing and proposed transport, active-travel, open-space, community and service infrastructure. The Local Planning Framework identifies indicative bus route to the south of the amendment site along the main east west road.
National Policy Objective 44 Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.	**Applicant's Response** The proposed development incorporates a range of dwelling types and sizes and has been designed having regard to accessibility and universal-design principles. The variety of accommodation proposed will contribute to housing choice and facilitate the changing needs of households over time.
National Policy Objective 45 Increase residential density in settlements, through a range of measure including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increase building heights and more compact forms of development.	**Applicant's Response** The proposal provides an efficient and compact form of residential development at a density appropriate to the site's location and accessibility. The amendments optimise the use of zoned residential land while maintaining appropriate standards of residential amenity, open space, landscaping and placemaking.
Chapter 9: Climate Transition and Our Environment	
National Policy Objective 77 Enhance water quality and resource management by: • Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities;	**Applicant's Response** The amended development incorporates an integrated surface-water management strategy and Sustainable Urban Drainage Systems. The engineering design has been informed by flood-risk considerations and updated site levels, with localised level

• Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non- porous surfacing and green roofs, to create safe places.	refinements facilitating appropriate drainage while maintaining the overall development strategy. We refer the Planning Authority to Plans and Particulars prepared by Waterman Moylan Consulting Engineers.
National Policy Objective 79 Support the management of stormwater, rainwater and surface water flood and pollution risk through the use of nature-based solutions and sustainable drainage systems, including the retrofitting of existing environments to support nature-based solutions	**Applicant's Response** The surface-water strategy incorporates SuDS and nature-based measures as part of the wider landscape and green-infrastructure framework. These measures seek to manage runoff sustainably, improve water quality and integrate surface-water management with the design of streets and open spaces. We refer the Planning Authority to Plans and Particulars prepared by Waterman Moylan Consulting Engineers.
National Policy Objective 83 Identify and strengthen the value of greenbelts and green spaces at a regional and city scale, to enable enhanced connectivity to wider strategic networks, prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas.	**Applicant's Response** The amendments retain the permitted strategic network of green infrastructure and public open space across the wider development.
National Policy Objective 89 Protect, conserve and enhance the rich qualities of natural, cultural and built heritage in a manner appropriate to their cultural and environment significance.	**Applicant's Response** The amended development has been designed having regard to the natural, archaeological, architectural and cultural heritage of the site and surrounding area. The Appropriate Assessment Screening Report and Ecological Impact Assessment, prepared by Altemar, and the Archaeological Assessment, prepared by DeFaoite Archaeology accompanying the application demonstrate that the proposal can be accommodated without unacceptable effects on identified heritage assets.
National Policy Objective 93 Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green infrastructure planning and innovative design solutions.	**Applicant's Response** The proposal supports reduced dependence on private car travel by providing a permeable walking and cycling network and facilitating access to public transport. The compact development pattern, green infrastructure and sustainable movement strategy are consistent with the integrated land-use approach promoted by NPO 93.
National Policy Objective 94 Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through Strategic Noise Maps, Noise Action Plans and national planning guidance.	**Applicant's Response** Potential noise impacts associated with the proposed development and surrounding land uses have been considered as part of the environmental assessment of the scheme. Appropriate design and mitigation measures are incorporated where required to safeguard the residential amenity of future and existing residents. Refer to the Acoustic Design Statement, prepared by Wave Dynamics

Eastern & Midland Regional Assembly Regional Spatial & Economic Strategy 2019 – 2031		*The Eastern and Midland Regional Spatial and Economic Strategy 2019–2031 came into effect on 28 June 2019 and provides the regional planning and economic framework for County Wicklow. Arklow is outside the Dublin Metropolitan Area and is identified within the regional/County settlement strategy as a Self-Sustaining Growth Town within the 'Core Region'. The RSES seeks to align population and housing growth with employment, infrastructure and sustainable transport, promote compact growth and healthy placemaking, and strengthen the self-sustaining role of settlements such as Arklow.* *This document sets out the regional level strategic planning policy for the eastern and midland region, and Dublin Metropolitan Area, in line with the national strategy and policy objectives for managing housing and employment development to support projected population growth set out in the NPF.*

Chapter 4 – People and Place	
Regional Policy Objective 4.26 Core strategies in local authority development plans shall support objectives to achieve a minimum of 30% of housing in Key Towns by way of compact growth through the identification of key sites for regeneration.	**Applicant's Response** While RPO 4.26 specifically refers to Key Towns, the proposal supports its broader compact-growth principles by delivering housing on appropriately zoned lands within Arklow in accordance with the County and local settlement strategy. The amendments provide an efficient use of land while retaining the infrastructure, amenities and services required to support sustainable growth.
Regional Policy Objective 4.41 RPO 4.41: Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance.	**Applicant's Response** The proposal supports the transition towards sustainable and low-carbon transport by retaining a permeable network of pedestrian and cycle routes and providing connections to the wider active-travel network and public transport services. The mixed-use framework for the wider lands also facilitates access to community, education, recreation and local services by walking and cycling.
Chapter 7 – Environment and Climate	
Regional Policy Objective 7.15 Local authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.	**Applicant's Response** The amendments retain the wider landscape and green-infrastructure strategy and have been informed by the Landscape Design Statement, prepared by Doyle & O'Troithigh Landscape Architects accompanying the application. Existing natural features are incorporated where appropriate, with landscaping, open space, biodiversity and sustainable drainage measures integrated into the development.
Regional Policy Objective 7.41 Support and promote structural materials in the construction industry that have low to zero embodied energy & CO_2 emissions.	**Applicant's Response** The detailed construction and material specification will have regard to applicable Building Regulations and national climate and energy requirements. Opportunities to minimise embodied carbon and utilise durable and lower-carbon materials will be considered through the detailed design and construction stages.
Regional Policy Objective 7.42 Local authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measures for more recharging	**Applicant's Response** The development provides for EV charging infrastructure in accordance with applicable planning as outlined earlier in this Planning Report with all spaces including ducting so to

facilities and prioritisation of parking for EVs in central locations.	be "EV ready" in the future. This in turn supports the transition towards lower-emission private transport. Refer to the Schedule of Accommodation and Car Parking Plan, prepared by O'Mahony Pike Architects.
Chapter 8 – Connectivity	
Regional Policy Objective 8.7 To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.	**Applicant's Response** The proposal promotes sustainable travel behaviour through the provision of high-quality walking and cycling infrastructure, appropriate cycle parking and connectivity to public transport and local services. The accompanying Mobility Management Plan prepared by Waterman Moylan Engineers further addresses the sustainable movement and mobility-management measures applicable to the development.
Regional Policy Objective 8.9 The RSES supports delivery of the bus projects set out in Table 8.3 subject to the outcome of appropriate environmental assessment and the planning process.	**Applicant's Response** The proposal includes the necessary road which can accommodate future local bus town services moving east to west.
Chapter 9 – Quality of Life	
Regional Policy Objective 9.10 In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)'.	**Applicant's Response** The Proposed Site Layout, prepared by O'Mahony Pike Architects prioritises walking and cycling through a connected and legible street network designed in accordance with DMURS principles. Streets, open spaces and active-travel connections are integrated with residential, community and recreational uses to create a safe, accessible and attractive residential environment.
Chapter 10 – Infrastructure	
Regional Policy Objective 10.15 Support the relevant local authorities (and Irish Water where relevant) in the Region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment and in the development and provision at a local level of Sustainable Urban Drainage solutions.	**Applicant's Response** The development incorporates a comprehensive surface-water drainage strategy including Sustainable Urban Drainage Systems and nature-based measures. Refer to the Engineering Services Report and Surface Water Management Plan, prepared by Waterman Moylan Consulting Engineers.
Regional Policy Objective 10.25 Development plans shall identify how waste will be reduced, in line with the principles of the circular economy, facilitating the use of materials at their highest value for as long as possible and how remaining quantums of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food and shall take account of the requirements of the Eastern and Midlands Region Waste Management Plan	**Applicant's Response** Refer to the enclosed waste plans prepared by AWN Consulting for both construction and operation phase of the development.

Climate Action Plan 2025		*The Climate Action Plan 2025 sets out the roadmap to deliver on Ireland's climate ambition. It aligns with the legally binding economy-wide carbon budgets and sectoral ceilings that were agreed by Government in July 2022. This will enable Ireland to meet 2030 targets and be well placed to meet mid-century decarbonisation objectives. This will also deliver cleaner air, warmer homes, a more secure energy system and a better quality of life for Irish citizens.*

Built Environment	
Key Target	**Applicant's Response**
All new dwellings designed and constructed to Nearly Zero Energy Building standard by 2025, and Zero Emission Building standard by 2030.	The proposed dwellings will be designed in accordance with applicable Building Regulations and national energy-performance requirements. The development therefore supports the transition towards a highly energy-efficient and progressively decarbonised building stock.

Transport		
Theme	**Key Target**	**Applicant's Response**
Reduction in Total Vehicle Kilometres	20% reduction in total vehicle kms. relative to 2030 Business As Usual scenario.	The proposed development supports the transport objectives of the Climate Action Plan by integrating land-use and transport planning, providing a permeable walking and cycling network and facilitating access to public transport and local services. The development is designed to encourage sustainable travel choices and reduce reliance on the private car.
Reduction in Fuel Usage	50% reduction in fuel usage.	
Increase in Sustainable Transport Trips	50% increase in daily active travel Journeys.	
	130% increase in daily public transport journeys.	
	25% reduction in daily car journeys.	
Shift in Daily Journeys Modal Share	Shift in Daily Mode Share.	
	2018: 72% (Car), 8% (Public Transport), 20% (Active Travel).	
	2030: 53% (Car), 19% (Public Transport),), 28% (Active Travel).	
Fleet Electrification	**Private Car Fleet** Battery EV share of total passenger car fleet (30%) EV share of new registrations (100%) 845,000 Private EVs	The proposal supports the transport objectives of the Climate Action Plan by integrating land-use and transport planning, providing a permeable walking and cycling network and facilitating the transition towards an increasingly electrified private car fleet.

Planning Design Standards for Apartments (2025)		*To meet housing demand in Ireland, it is necessary to significantly increase supply. This is a key pillar of the overarching Housing for All Plan. The National Planning Framework targets increased housing supply in Ireland's cities and urban areas in particular. For the reasons outlined earlier, increased housing supply must include a dramatic increase in the provision of apartment development.*
Housing Mix		
Specific Planning Policy Requirement 1 – Unit Mix (A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms. (B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.		**Applicant's Response** The proposed apartment mix has been developed having regard to SPPR 1 and forms part of the wider range of dwelling types and sizes proposed. Refer to the Architectural Design Statement and Schedule of Accommodation, prepared by O'Mahony Pike Architects for further details.
Apartment Design Standards		
Specific Planning Policy Requirement 2– Floor Areas *Specific Planning Policy Requirement 2* requires that the following minimum floor areas are achieved for apartments: - ***Minimum Apartment Floor Areas: -*** *Studio Apartment (1 person) 32sqm* *1-bedroom apartment (2 persons) 45sqm* *2-bedroom apartment (3 persons) 63sqm* *2-bedroom apartment (4 persons) 73sqm* *3-bedroom apartment (4 persons) 76sqm* *3-bedroom apartment (5 persons) 90sqm* The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing. The SPRR also states "statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out".		**Applicant's Response** All proposed apartments exceed the minimum floor area standards. Refer to the Architectural Design Statement, floor plan drawings and Schedule of Accommodation, prepared by O'Mahony Pike Architects.
Specific Planning Policy Requirement 3– Dual Aspect		**Applicant's Response**

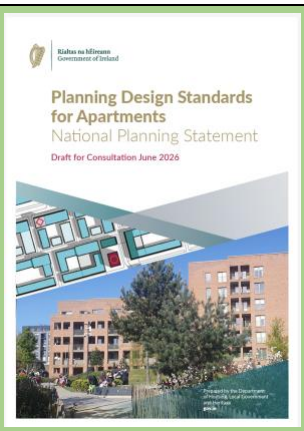
Specific Planning Policy Requirement 3 states that "In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply: i. A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement. ii. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.."	The proposed apartment units satisfies the dual aspect requirements. Detailed unit by unit compliance is demonstrated in the accompanying Housing Quality Assessment, prepared by O'Mahony Pike Architects. A total of 67% of units are dual aspect as confirmed in the Housing Quality Assessment (HQA) prepared by OMP Architects.
Specific Planning Policy Requirement 4 – Floor to Ceiling Heights Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. 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.	**Applicant's Response** The proposed apartments have been designed to comply with the minimum floor-to-ceiling height requirements, as demonstrated in the accompanying elevations and sections drawings. We refer the Planning Authority to the site sections for Block A prepared by OMP Architects.
Specific Planning Policy Requirement 5 – Lift and Stair Cores There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.	**Applicant's Response** The proposed apartment circulation and core arrangements have been designed having regard to SPPR 5 and provide safe, efficient and accessible circulation for residents.
Section 3.7 – Internal Storage Minimum requirements for storage areas are set out in Appendix 1: - • Studio apartment 3 sq. m • 1-bedroom apartment 3 sq. m • 2-bedroom apartment (3 persons) 5 sq. m • 2-bedroom apartment (4 persons) 6 sq. m • 3-bedroom apartment(4 Persons) 6 sq. m • 3-bedroom apartment (5 persons) 9 sq. m Other considerations: - • No individual storage room within an apartment should exceed 3.5 sq. m. • Apartment schemes should provide storage for bulky items outside individual units (i.e. at ground or basement level). Where secure, allocated ground or basement level storage is provided, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these guidelines.	**Applicant's Response** All apartments are provided with internal storage in accordance with the minimum standards. Detailed storage provision is identified within the accompanying architectural drawings and Housing Quality Assessment, prepared by O'Mahony Pike Architects.
Section 3.8 – Private Amenity Space	**Applicant's Response**

It is a policy requirement that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Minimum required areas for private amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment(4 Persons) 7sq.m • 3-bedroom apartment (5 persons) 9 sq. m A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the minimum floor area requirement under these guidelines.	Private amenity space is provided to the proposed apartments in the form of balconies, terrace and/or ground floor private amenity areas, as appropriate, in accordance with the quantitative and qualitative standards. The balconies range in size from 5.4sq/m for 1 beds to 7.2 sq/m for 2 beds meeting minimums. We refer the Planning Authority to the plans for Block A prepared by OMP Architects for further details and confirmation on this.
Communal Facilities	
Section 4.2– Waste Management Provision shall be made for the storage and collection of waste materials in apartment schemes. Waste storage facilities shall be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and ensure adequate containers can be provided for residual, recyclable and food waste, to comply with waste management legislation, at designated waste storage points.	**Applicant's Response** Appropriate waste storage and collection facilities are provided for the apartment and multi-unit elements of the development, with provision for the segregation of residual, recycle and organic waste. Refer to the Operation Waste Management Plan, prepared by AWN Consulting.
Section 4.3 – Communal Amenity Space Minimum required areas for public communal amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment (4 Persons) 7sq.m • 3-bedroom apartment (5 Persons) 9 sq. m For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, communal amenity space may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality	**Applicant's Response** The proposed apartments are supported by appropriately located and designed communal amenity space, integrated with the wider landscape and public open space network and provided in accordance with the standards.
Section 4.4 – Children's Play Children's play needs around the apartment building should be catered for: • Within the private open space associated with individual apartments (see chapter 3); • Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and • Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that	**Applicant's Response** The proposed development provides a hierarchy of play and recreational opportunities integrated throughout the wider open space network. This includes equipped play provision and the wider recreational infrastructure required under the SLO4 framework.

includes 100 or more apartments with two or more bedrooms.	
Specific Planning Policy Requirement 6 – Communal, Community and Cultural Facilities Specific Planning Policy Requirement 6 states that: • The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	**Applicant's Response** The proposed development forms part of a wider mixed-use development framework that includes community, childcare, educational, recreational and neighbourhood uses. No separate communal, community or cultural facility requirement arises solely be reference to the apartment element under

Draft National Planning Statement on Planning Design Standards for Apartments (2026)

The June 2026 draft National Planning Statement (NPS) is assessed below alongside the current Design Standards for Apartments Guidelines for Planning Authorities (2025). The draft has not yet been issued and the 2025 Guidelines remain applicable at the date of this report. The assessment below addresses the published draft in case an NPS is issued before the planning decision. Its final text and commencement position should be checked before lodgement and again when the application is determined. National Planning Policies and Measures (NPPMs) are distinguished from the supporting National Planning Policy Guidance.

Draft Planning Design Standards for Apartments National Planning Statement (2026)		*This National Planning Statement sets out policy and guidance in relation to the planning and development of apartments in all housing or mixed-use developments that include apartments that may be made available for sale, whether for owner occupation or for individual lease, or for rental purposes.*
Apartment Mix		
National Planning Policy and Measure No. 1 – Apartment Mix With the exception of social housing developments, social/affordable housing provided for under Part V of the Act of 2000 or Part 7 of the Planning and Development Act 2024, or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.	**Applicant's Response** The proposed scheme includes the following unit mix: - 1 Bed Apartment: 6 2 Bed Apartment: 12 The range of unit types and sizes being provided will facilitate a mix of family types and tenures emerging in this location. Refer to the Architectural Design Statement and Schedule of Accommodation, prepared by O'Mahony Pike Architects for further details.	
Apartment Design Standards		
National Planning Policy and Measure No. 2– Apartment Floor Areas The following minimum apartment floor areas shall apply, and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:	**Applicant's Response** The proposed units meet or exceed the minimum floor area requirements, Setout in SPPR 2. We note the Design Standards for Apartments 2025 reduced the requirement for the majority of units to exceed the minimum sizes set out in SPPR2 by 10% to 25% of all	

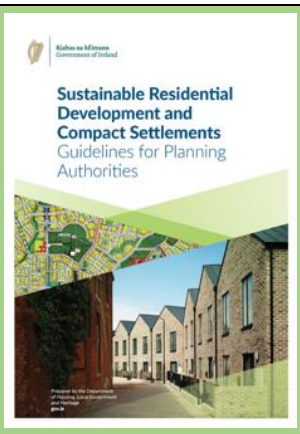
• Studio apartment (1 person) • 1-bedroom apartment (2 persons) 45 sq.m • 2 bedroom apartment (3 persons) 63 sq.m 32 sq.m • 2-bedroom apartment (4 persons) 73 sq.m • 3-bedroom apartment (4 persons) 76 sq. m • 3-bedroom apartment (5 persons) 90 sq.m The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.	units, in an effort to increase the economic viability of apartment schemes. In this context, 26.8% of the proposed units exceed the minimum floor area sizes Setout in SPPR 2 which comfortably above the 25% Standard. We refer to the unit type drawings, floor plan drawings, Housing Quality Assessment, and Schedule of Accommodation, and Design Statement prepared by OMP Architects for compliance in regard to SPPR 2 and further details.
National Planning Policy and Measure No. 3– Dual Aspect Ratios A minimum of 25% of units within a development are required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this National Planning Policy and Measure.	**Applicant's Response** All houses within the proposed scheme are dual aspect, and c. 66.7% of the proposed apartment units are dual aspect and therefore significantly above the required minimum standard of 25% as outline in SPPR 3. We refer the Planning Authority to the Schedule of Areas, prepared O'Mahony Pike Architects for further detail.
National Planning Policy and Measure No. 4 – Floor to Ceiling Height A minimum ground level apartment floor to ceiling height of 2.7m shall apply and statutory plans shall not specify a minimum ground level apartment floor to ceiling height requirement that exceeds 2.7m.	**Applicant's Response** All apartment and duplex units have a ground level floor to ceiling height of min. 2.7m. We refer the Planning Authority to the Apartment elevation and section drawings, prepared by O'Mahony Pike Architects for further detail.
National Planning Policy and Measure No. 5 – Lift and Stair Cores There shall be no requirement within statutory plans in respect of the number of units per floor per core.	**Applicant's Response** Not relevant to the proposed application.
Section 3.7 – Internal Storage Minimum requirements for storage areas are set out in Appendix 1: - • Studio apartment 3 sq. m • 1-bedroom apartment 3 sq. m • 2-bedroom apartment (3 persons) 5 sq. m • 2-bedroom apartment (4 persons) 6 sq. m • 3-bedroom apartment(4 Persons) 6 sq. m • 3-bedroom apartment (5 persons) 9 sq. m Other considerations: - • No individual storage room within an apartment should exceed 3.5 sq. m. • Apartment schemes should provide storage for bulky items outside individual units (i.e. at ground or basement level). Where secure, allocated ground or basement level storage is provided, it may be used to satisfy up to half of the minimum storage requirement for individual apartment units, but shall not serve to reduce the minimum floor area required to be provided within each individual apartment unit, as set out in these guidelines.	**Applicant's Response** In the first instance, we refer to the Housing Quality Assessment and the Architectural Design Statement prepared by OMP Architects for further details in relation to compliance with section 3.7 – Internal storage. We note any shortfall in storage on plan will be comfortably compensated by way of a folding attic stairs and partially floored out attic area that the Applicant is providing as standard in all houses at this development. We refer the Planning Authority to the House Type Drawings and Housing Quality Assessment, prepared by O'Mahony Pike Architects for further detail. No individual storage rooms are larger than 3.5 sq. m.
Section 3.8 – Private Amenity Space It is a policy requirement that private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies at upper levels.	**Applicant's Response**

Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security. Minimum required areas for private amenity space are set out in Appendix 1: - • Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment(4 Persons) 7sq.m • 3-bedroom apartment (5 persons) 9 sq. m A minimum depth of 1.5 metres is required for balconies, in one useable length to meet the minimum floor area requirement under these guidelines. Vertical privacy screens should be provided between adjoining balconies and the floors of balconies should be solid and self-draining. The number of units without direct access to private amenity space within apartment schemes should not exceed 50%. Where the location and characteristics of the site allow for higher levels of private amenity space provision, for example on larger sites or in more suburban settings, higher levels of private amenity space should be provided.	We refer the Planning Authority to the House Type Drawings and Schedule of Areas, prepared by O'Mahony Pike Architects for further detail.
Communal Facilities	
Section 4.2– Waste Management Waste storage facilities should be accessible to each apartment stair/lift core and designed with regard to the projected level of waste generation and ensure adequate containers can be provided for residual, recyclable and food waste, to comply with waste management legislation, at designated waste storage points. Within apartments, there should be adequate provision for the temporary storage of segregated materials prior to deposition in communal waste storage and in-sink macerators are discouraged as they place a burden on drainage systems. Section 5.3.6 of the SRDCSGs sets out that multi-unit refuse storage areas should be provided in open spaces that will not be taken in charge. Such facilities should be screened and integrated with surrounding structures/landscaping. Waste storage facilities may also be provided in basement areas, but must ensure adequate access and manoeuvring space for collection vehicles. Waste storage facilities should be designed so that they are adequately ventilated, well-lit and not accessible to the general public. The capacity for washing down waste storage areas should also be considered, with wastewater discharging to the sewer, as appropriate. Appendix C of the SRDCSGs also recommends that Operational Waste Management Plans be submitted in support of 30 or more residential units or 1,000 sq. metres of mixed-use development.	**Applicant's Response** Dedicated bin stores are provided for the apartments. An Operational Waste Management Plan is enclosed with this application in this instance.
Section 4.3 – Communal Amenity Space Minimum required areas for public communal amenity space are set out in Appendix 1: -	**Applicant's Response** Dedicated communal open spaces areas are provided for the apartments. We refer the Planning Authority to the Schedule of Areas, prepared by O'Mahony Pike

• Studio apartment 4 sq. m • 1-bedroom apartment 5 sq. m • 2-bedroom apartment (3 persons) 6 sq. m • 2-bedroom apartment (4 persons) 7 sq. m • 3-bedroom apartment (4 Persons) 7sq.m • 3-bedroom apartment (5 Persons) 9 sq. m Communal amenityspace may be provided as a garden within the courtyard of a perimeter block or adjoining a linear apartment block. Designers mustensure that the heights and orientation of adjoining blocks permit adequate levels of sunlight to reach communal amenity space throughout the year. Roof gardens may also be provided but must be accessible to residents, subject to requirements such as safe access by children. These facilities offer a satisfactory alternative where climatic and safety factors are fully considered, but children's playis not passively supervised as with courtyards. Regard must also be had to the future maintenance of communal amenity areas in order to ensure that this is commensurate with the scale of the development and does not become a burden on residents. The Settlement Guidelines also state that new developments should adopt a nature-based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. This include a range of measures such as detention areas, rainwatergardens, permeable paving and green roofs that may be provided in communal amenity spaces. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, communal amenity space may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality	Architects which demonstrates that the minimum areas are comfortably exceeded.
Section 4.4 – Children's Play Children's play needs around the apartment building should be catered for: • Within small play spaces (about 85 – 100 sq. metres) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and • Within play areas (200–400 sq. metres) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms. The perimeter block with a central communal open space is particularly appropriate for children's play, especially if access from the street is controlled. The landscape design and orientation of play areas can contribute significantly to their amenity value. However, the noise from courtyard play areas can diminish residential amenity, particularly in smaller schemes, and designers must find solutions which balance all the factors involved.	**Applicant's Response** A creche is provided on the ground floor of Block A, with an estimated capacity of c. 135 childcare places. A play area for the creche is provided at ground level with an external enclosed play area. In terms of children's play, landscaping drawings prepared by Doyle & O'Troithigh Landscape Architects show further details of playground equipment across the site.
National Planning Policy and Measure No. 6 – Communal, Community and Cultural Facilities The provision of new Communal, Community and Cultural facilities within apartment schemes shall only be required	**Applicant's Response** Not relevant in the proposed development.

in specific locations identified within the development plan and shall not be required on a blanket threshold-based approach in individual apartment schemes.	
National Planning Policy and Measure No. 7 – Shared Accommodation/Co-living Dependents There shall be a presumption against granting planning permission for shared accommodation/co-living development unless the proposed development is required to meet specific demand identified by a local planning authority further to a Housing Need and Demand Assessment (HNDA) process.	**Applicant's Response** Not relevant to the proposed application.
National Planning Policy and Measure No. 8 – Purpose-Built Student Accommodation The following requirements shall apply to Purpose-Built Student Accommodation (PBSA) and statutory plans shall not specify requirements that differ from or exceed the requirements specified below: (i) There shall be no requirement or restriction in relation to the provision of en-suite bathrooms for single study bedrooms within Purpose Built Student Accommodation schemes. (ii) The minimum required area for a single study bedroom without en-suite facilities shall be 8 sq.m and the minimum required area for a single study bedroom with en-suite facilities shall be 11.5 sq.m. (iii) The minimum space requirements for kitchen/dining/living areas serving 10 and 12 persons shall be 3.6 sq.m and 3.3 sq.m per person, respectively.	**Applicant's Response** Not relevant to the proposed application.

Sustainable Residential Development and Compact Settlements Guidelines (2024)



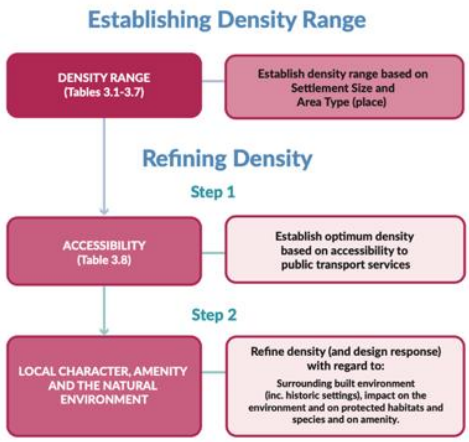
Sustainable Residential Development and Compact Settlements Guidelines (2024) set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

Section 3 – Settlement, Place & Density

Policy and Objective 3.1 – Density Ranges

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.

Figure 3.3:
Illustration of the process for establishing, optimising and refining appropriate density for a plan or development.



Applicant's Response

The proposed density is considered appropriate having regard to Arklow's settlement role, the site's accessibility, the planned character of the SLO4 lands and the availability of existing and proposed infrastructure and services. The amendments provide an efficient use of zoned land while maintaining a high standard of residential amenity and placemaking.

Arklow is considered to fall within table 3.5 'Key Town / Large Town – Suburban / Urban Extension' which allows densities in the range of between 30 to 50 dph. The overall amended density is 40.8 dwellings per hectare which sits at the midpoint in the density bands.

(ii) Table 3.5 - Areas and Density Ranges Key Towns and Large Towns (5,000+ population)[10]

Key Town / Large Town - Centre and Urban Neighbourhood The centre comprises the town centre and the surrounding streets, while urban neighbourhoods consist of the early phases of residential development around the centre that have evolved over time to include a greater range of land uses. It is a policy and objective of these Guidelines that residential densities in the range 40 dph-100 dph (net) shall generally be applied in the centres and urban neighbourhoods.
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).

Section 5 – Development Standards for Housing

Specific Planning Policy Requirement 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 separation distance of at least 16 metres between opposing windows serving habitable rooms16 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

Applicant's Response

The proposed development has been designed in accordance to SPPR 1. Refer to the architectural drawings, prepared by O'Mahony Pike Architecture.

scheme to prevent undue overlooking of habitable rooms and private amenity spaces.

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.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity and that the proposed development will not have a significant negative impact on the amenity of occupiers of existing residential properties.

Specific Planning Policy Requirement 2 – Minimum Private Open Space Standards for Houses

It is a specific planning policy requirement of these Guidelines that proposals for new houses meet the following minimum private open space standards:

- 1 bed house 20 sq. m
- 2 bed house 30 sq. m
- 3 bed house 40 sq. m
- 4 bed + house 50 sq. m

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 below). The planning authority should be satisfied that the compensatory semi-private open space will provide a high standard of amenity for all users and that it is well integrated and accessible to the housing units it serves.

Apartments and duplex units shall be required to meet the private and semi-private open space requirements set out in the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2023 (and any subsequent updates).

For building refurbishment schemes on sites of any size or urban infill schemes on smaller sites (e.g. sites of up to 0.25ha) the private open space standard may be relaxed in part or whole, on a case-by-case basis, subject to overall design quality and proximity to public open space.

In all cases, the obligation will be on the project proposer to demonstrate to the satisfaction of the planning authority or An Bord Pleanála that residents will enjoy a high standard of amenity.

Table 5.1 Minimum Private Open Space Standard for Houses

House	Minimum Private Open Space	Max Semi-Private (in lieu)
1 bed	20 sq.m	10 sq.m
2 bed	30 sq.m	15 sq.m
3 bed	40 sq.m	20 sq.m
4 bed+	50 sq.m	25 sq.m

Applicant's Response

The proposed houses are provided with private open space in accordance with SPPR 2. The location, orientation and configuration of private amenity areas provide usable and appropriately screened spaces for residents.

Specific Planning Policy Requirement 3 – Car Parking

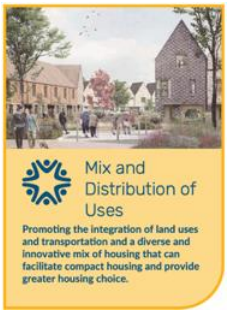
It is a specific planning policy requirement of these Guidelines that:

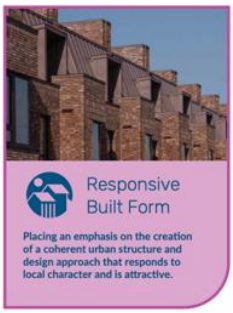
i. In city centres and urban neighbourhoods of the five cities, defined in Chapter 3 (Table 3.1 and Table 3.2) car-parking provision should be minimised, substantially reduced or wholly eliminated. The

Applicant's Response

Car parking provision has been determined having regard to the site's location and accessibility and the maximum standards. Detailed parking provision is set out in the accompanying Schedule of Accommodation and Parking Schedule both prepared by O'Mahony Pike Architects and

maximum rate of car parking provision for residential development at these locations, where such provision is justified to the satisfaction of the planning authority, shall be 1 no. space per dwelling. ii. In accessible locations, defined in Chapter 3 (Table 3.8) car- parking provision should be substantially reduced. The maximum rate of car parking provision for residential development, where such provision is justified to the satisfaction of the planning authority, shall be 1.5 no. spaces per dwelling. iii. 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 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.	reports prepared by Waterman Moylan Consulting Engineers.
Specific Planning Policy Requirement 4 – Cycle Parking and Storage 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: 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. ii. 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.	**Applicant's Response** Safe and secure cycle parking and storage are provided throughout the development for residents and visitors, with the design and quantum of provision having regard to SPPR 4 and the range of dwelling types proposed. The houses have access to their rear gardens whilst bike storage is provided for the apartments.
Section 4.4 – Key Indicators of Quality Design and Placemaking	





(i) Sustainable and Efficient Movement a) New developments should, as appropriate, include a street network (including links through open spaces) that creates a permeable and legible urban environment, optimises movement for sustainable modes (walking, cycling and public transport) and is easy to navigate. b) New developments should connect to the wider urban street and transport networks and improve connections between communities, to public transport, local services and local amenities such as shops, parks and schools, where possible. c) Active travel should be prioritised through design measures that seek to calm traffic and create street networks that feel safe and comfortable for pedestrians and cyclists. d) The quantum of car parking in new developments should be minimised in order to manage travel demand and to ensure that vehicular movement does not impede active modes of travel or have undue prominence within the public realm. Chapter 5 Development Standards includes a specific planning policy requirement (SPPRs) that addresses car parking rates in new residential developments.	**Applicant's Response** The proposed provides a permeable and legible street and active travel network that prioritises walking and cycling and connects with the wider movement network. The proposed amendments retain the principal movement framework established by the parent permission and integrate residential areas with open space, community facilities and local services.
Policy and Objective 4.1 – DMURS 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.	**Applicant's Response** The street network and public realm have been designed having regard to DMURS principles, including appropriate street hierarchy, pedestrian and cyclist priority, traffic calming, passive surveillance and the creation of attractive and safe streets and spaces.
(ii) Mix and Distribution of Uses a) In city and town centres and at high capacity public transport nodes and interchanges (defined in Table 3.8), development should consist of high intensity mix-use development (residential, commercial, retail, cultural and community uses) that responds in scale and intensity to the level of accessibility. At major transport interchanges, uses should be planned in accordance with the principles of Transport Orientated Development. b) In city and town centres, planning authorities should plan for a diverse range of uses including retail, cultural and residential uses and for the adaption and re-use of the existing building stock (e.g. over the shop living). It is also important to plan for the activation of outdoor spaces and the public realm to promote more liveable city and town centres. Much of this can be achieved though the implementation	**Applicant's Response** The residential development forms part of the wider SLO4 mixed-use framework, which provides for childcare, education, neighbourhood, community, recreation and open space uses. The proposed amendments retain this overall mix and support the development of a sustainable neighbourhood in which everyday facilities can be accessed by walking and cycling.

of urban enhancement and traffic demand management measures that work together to free up space for active travel and create spaces that invite people to meet, mingle and dwell within centres. c) In areas that are less central, the mix of uses should cater for local services and amenities focused around a hierarchy of local centres that support residential communities and with opportunities for suitable non-residential development throughout. d) In all urban areas, planning authorities should actively promote and support opportunities for intensification. This could include initiatives that support the more intensive use of existing buildings (including adaption and extension) and under-used lands (including for example the repurposing of car parks at highly accessible urban locations that no longer require a high level of private car access). e) It will be important to align the integration of land uses and centres with public transport in order to maximise the benefits of public transport. f) The creation of sustainable communities also requires a diverse mix of housing and variety in residential densities across settlements. This will require a focus on the delivery of innovative housing types that can facilitate compact growth and provide greater housing choice that responds to the needs of single people, families, older people and people with disabilities, informed by a Housing Needs Demand Assessment (HNDA) where possible. Development plans may specify a mix for apartment and other housing developments, but this should be further to an evidence-based Housing Needs and Demand Assessment.	
(iii) Green & Blue Infrastructure a) Plan for the protection, restoration and enhancement of natural features, biodiversity and landscapes, and ensure that urban development maintains an appropriate separation and setback from important natural assets. New development should seek to protect and enhance important natural features (habitats and species) within and around the site, should avoid the degradation of ecosystems and include measures to mitigate against any potential negative ecological impacts. b) Plan for an integrated network of multifunctional and interlinked urban green spaces. This is addressed further in subsection (iii) Public Open Space below. c) Promote urban greening and Nature-based Solutions (including Sustainable Drainage Systems and slow-the-flow initiatives) for the management of urban surface waters in all new developments and retrofitting in existing areas to ensure that the benefits of ecosystem services are realised13. Planning authorities should adopt a nature based approach to urban drainage that uses soft-engineering techniques and native vegetation (including the protection of the riparian zone) to minimise the impact on natural river processes. d) The use of Nature-based Solutions at ground level may not be possible on certain brownfield sites due to historic land contamination. In such cases,	**Applicant's Response** The proposed development incorporates an interconnected network of landscaped open spaces, green infrastructure and sustainable drainage measures. The amendments retain the overall landscape strategy and integrate biodiversity, surface-water management and active travel functions within the open space network. We additionally refer the Planning Authority to Plans and Particulars prepared by both Waterman Moylan Consulting Engineers and Doyle & O'Troithigh Landscape Architects.

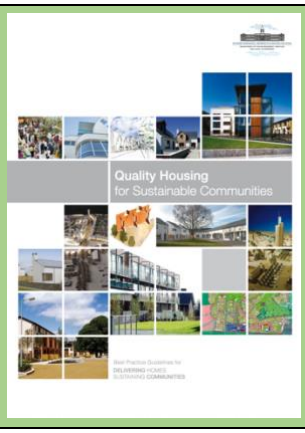
alternative solutions such as green roofs and walls can be considered.	
(iv) Open Space b) Public open space provided as part of new development proposals. These spaces should be designed to retain and protect natural features and habitats of importance within the site and to maximise biodiversity gain. They should also form an integral part of the overall design. These spaces may be offered for taking in charge by the local authority following the completion of the development.	**Applicant's Response** A comprehensive hierarchy of public open space is retained across the proposed development. We refer the Planning Authority to POS breakdowns prepared by Doyle & O'Troithigh Landscape Architects and OMP Architects respectively.
(v) Responsive Built Form a) New development should support the formation of a legible and coherent urban structure with landmark buildings and features at key nodes and focal points. b) New development should respond in a positive way to the established pattern and form of development and to the wider scale of development in the surrounding area. The height, scale and massing of development in particular should respond positively to and enhance the established pattern of development (including streets and spaces). c) The urban structure of new development should strengthen the overall urban structure and create opportunities for new linkages where possible. d) Buildings should generally present well-defined edges to streets and public spaces to. ensure that the public realm is well-overlooked with active frontages. e) New development should embrace good modern architecture and urban design that is innovative and varied, and respects and enhances local distinctiveness and heritage. f) Materials and finishes should be of high quality, respond to the local palette of materials and finishes and be highly durable.	**Applicant's Response** The proposed layout provides a coherent urban structure defined by a clear hierarchy of streets and public open spaces to promote passive surveillance, while the scale, massing and architectural treatment provide an appropriate transition through the development.
Policy and Objective 4.2 – Quality Urban Design 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.	**Applicant's Response** The development has been designed in accordance with the key indicators of quality urban design and placemaking, with particular emphasis on connectivity, mixed and contemporary uses, green and blue infrastructure, high quality open space and responsive built form.
Policy and Objective 5.1 – Public Open Space 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 area and broader nature conservation and environmental considerations.	**Applicant's Response** The proposal provides public open space as an integral component of the overall development strategy and in accordance with the plan-led requirements to the SLO4 lands. The open space network accommodates recreation, play, landscaping, biodiversity, sustainable drainage and active travel functions. The Guidelines recognise that strategic development sites may determine open space provision on a plan-led basis.

In the case of strategic and sustainable development sites, the minimum public open space requirement will be determined on a plan-led 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.	
Section 5.3.6 – Operation and Management of the Development For developments that include multi-unit and compact housing blocks, communal facilities such as refuse storage areas should be provided in open spaces that will not be taken in charge. Planning applications should include an operational management plan that sets out details of the long-term management and maintenance of the scheme. The plan should address provisions made for the storage and collection of waste materials in residential schemes, particularly where there are reduced areas of private outdoor space. Communal refuse facilities shall be accessible to each housing unit and designed with regard to the projected level of waste generation and types and quantities of receptacles required.	**Applicant's Response** The development makes appropriate provision for the longer, operation and management of communal areas and facilities, including waste storage and collection associated with multi-unit elements. Detailed arrangements are addressed in the accompanying Operational Waste management Plan, prepared by AWN Consulting.
Section 5.3.7 – Daylight The provision of acceptable levels of daylight in new residential developments is an important planning consideration, in the interests of ensuring a high quality living environment for future residents. It is also important to safeguard against a detrimental impact on the amenity of other sensitive occupiers of adjacent properties. In cases where a technical assessment of daylight performance is considered by the planning authority to be necessary regard should be had to quantitative performance approaches to daylight provision outlined in guides like A New European Standard for Daylighting in Buildings IS EN17037:2018, UK National Annex BS EN17037:2019 and the associated BRE Guide 209 2022 Edition (June 2022), or any relevant future standards or guidance specific to the Irish context.	**Applicant's Response** The layout, orientation and separation of buildings have been developed to provide an appropriate standard of daylight and sunlight for future residents while safeguarding adjoining residential amenity. Refer to the Sunlight and Daylight Assessment, prepared by Digital Dimensions.

Appendix D: Design Checklist - Key Indicators of Quality Urban Design and Placemaking	
1. Sustainable and Efficient Movement i. Will the plan or development proposal establish a highly permeable and legible network of streets and spaces within the site that optimises movement for sustainable modes of transport (walking, cycling and public transport)? ii. Have opportunities to improve connections with and between established communities been identified and responded to with particular regard to strategic connections between homes, shops, employment opportunities, public transport, local services and amenities? iii. Are streets designed (including the retrofitting of existing streets adjacent to or on-route to the site, where appropriate) in accordance with DMURS to calm traffic and enable the safe and comfortable movement of vulnerable users? iv. Has the quantum of parking been minimised (in accordance with SPPR4 where relevant) and designed and located in a way that seeks to reduce the demand for private car use, promote sustainable modes of transport and ensure that the public realm is not dominated by parked vehicles?	**Applicant's Response** The proposed amendments retain and reinforce the permeable and legible movement framework established under the parent permission. The development provides a clear hierarchy of streets and spaces, with pedestrian and cycle routes integrated throughout the residential layout and connected to the wider active-travel and transport network. The principal access arrangements, distributor road and road hierarchy remain substantially as permitted. The layout has been designed having regard to DMURS principles, with an emphasis on pedestrian and cyclist priority, traffic calming, passive surveillance and safe movement for vulnerable road users. The revised phasing also coordinates residential delivery with the strategic road and active-travel infrastructure required to serve the wider development. Car and bicycle parking provision has been developed having regard to the site's location and accessibility and the applicable standards, with safe and secure cycle parking provided for residents and visitors. Refer to the Transportation documentation prepared by Waterman Moylan Consulting Engineers and the Architectural Design Statement and Schedule of Accommodation prepared by O'Mahony Pike Architects.
2. Mix of Land Uses (Vibrant Centres and Communities) i. Is the mix and intensity of land uses appropriate to the site and its location and have land uses been distributed in a complementary manner that optimises access to public transport, amenities and local services via walking or cycling? ii. Have a diverse and varied range of housing types been provided to meet local and projected needs (having regard to the Housing Need Demand Assessment), supplemented by an innovative range of housing typologies that support greater housing affordability and choice? iii. Will the plan or development proposal supplement and/or support the regeneration and revitalisation of an existing centre or neighbourhood, including the adaption and re-use of the existing building stock in order to reduce vacancy and dereliction (where applicable) and promote town centre living (where applicable)? iv. Is the regeneration and revitalisation of an existing centre or neighbourhood supported by the enhancement of the public realm so as to create a more liveable environment, attract investment and encourage a greater number of visitors (where applicable)?	**Applicant's Response** The proposed residential development forms part of the wider SLO4 mixed-use framework, which provides for childcare, education, neighbourhood, community, recreation and open-space uses. The proposed amendments retain this overall mix and support the development of a sustainable neighbourhood in which everyday facilities can be accessed by walking and cycling. Refer to the Architectural Design Statement, Phasing Plan and Site Layout Plan, prepared by O'Mahony Pike Architects.
3. Green and Blue Infrastructure (Open Space, Landscape and Heritage)	**Applicant's Response**

i. Has the plan or development proposal positively responded to natural features and landscape character, with particular regard to biodiversity, vistas and landmarks and the setting of protected structures, conservation areas and historic landscapes? ii. Have a complementary and interconnected range of open spaces, corridors and planted/landscaped areas been provided, that create and conserve ecological links and promotes active travel and healthier lifestyles? iii. Are public open spaces universally accessible and designed to cater for a range of active and passive recreational uses (taking account of the function of other spaces within the network)? iv. Does the plan or development proposal include integrated nature-based solutions for the management of urban drainage to promote biodiversity, urban greening, improved water quality and flood mitigation?	The scheme provides an interconnected network of public open spaces, landscaped areas and pedestrian and cycle routes which support biodiversity, recreation, active travel and healthy lifestyles. The wider development also retains the active recreation and open-space provision required under the SLO4 framework. The surface-water strategy incorporates Sustainable Urban Drainage Systems (SuDS) and nature-based measures as part of the wider landscape and green-infrastructure framework. These measures seek to sustainably manage runoff, improve water quality and integrate surface-water management with the design of streets and open spaces. Refer to the Landscape Design Statement and Landscape Plans prepared by Doyle & O'Troithigh Landscape Architects, and Engineering Services Report prepared by Waterman Moylan Consulting Engineers.
4. Responsive Built Form i. Does the layout, orientation and scale of development support the formation of a coherent and legible urban structure in terms of block layouts and building heights with particular regard to the location of gateways and landmarks, the hierarchy of streets and spaces and access to daylight and sunlight? ii. Do buildings address streets and spaces in a manner that will ensure they clearly define public and private spaces, generate activity, maximise passive surveillance and provide an attractive and animated interface? iii. Does the layout, scale and design features of new development respond to prevailing development patterns (where relevant), integrate well within its context and provide appropriate transitions with adjacent buildings and established communities so as to safeguard their amenities to a reasonable extent? iv. Has a coherent architectural and urban design strategy been presented that will ensure the development is sustainable, distinctive, complements the urban structure and promotes a strong sense of identity?	**Applicant's Response** The proposed amendments retain the overall urban-design and placemaking principles established by the parent permission and provide a coherent and legible residential layout structured around a clear hierarchy of streets and public open spaces. Buildings are positioned and orientated to appropriately define streets and spaces, provide passive surveillance and distinguish between public and private areas. The revised residential layout provides a range of dwelling types and sizes while maintaining an overall coherent architectural approach. Refer to the Architectural Design Statement, Housing Quality Assessment and architectural drawings prepared by O'Mahony Pike Architects and the Sunlight & Daylight Assessment prepared by Digital Dimensions.

Quality Housing for Sustainable Communities (2007)



Quality Housing for Sustainable Communities (2007) identify principles and criteria that are important in the design of housing and to highlight specific design features, requirements and standards that have been found, from experience, to be particularly relevant.

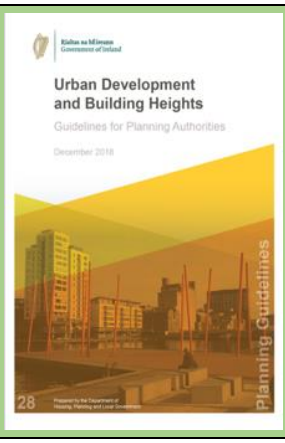
Table 5.1 (below) sets out the space provision and room sizes for typical dwellings which all houses within a proposed development must adhere to these standards.

Table 5.1: Space provision and room sizes for typical dwellings

DWELLING TYPE	TARGET GROSS FLOOR AREA	MINIMUM - MAIN LIVING ROOM	AGGREGATE LIVING AREA	AGGREGATE BEDROOM AREA	STO
	(m^2)	(m^2)	(m^2)	(m^2)	
Family Dwellings - 3 or more persons					
4BED/7P House (3 storey)	120	15	40	43	
4BED/7P House (2 storey)	110	15	40	43	
4BED/7P House (1 storey)	100	15	40	43	
4BED/7P Apartment	105	15	40	43	1
3BED/6P House (3 storey)	110	15	37	36	
3BED/6P House (2 storey)	100	15	37	36	
3BED/6P House (1 storey)	90	15	37	36	
3BED/6P Apartment	94	15	37	36	1
3BED/5P House (3 storey)	102	13	34	32	
3BED/5P House (2 storey)	92	13	34	32	
3BED/5P House (1 storey)	82	13	34	32	
3BED/5P Apartment	86	13	34	32	
3BED/4P House (2 storey)	83	13	30	28	
3BED/4P House (1 storey)	73	13	30	28	
3BED/4P Apartment	76	13	30	28	

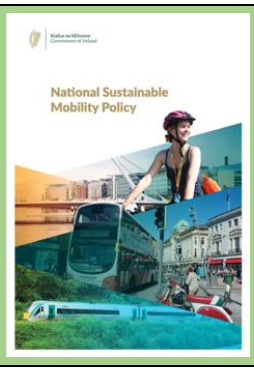
Applicant's Response

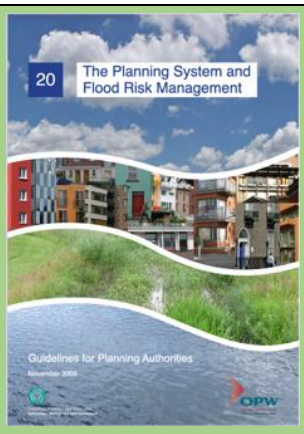
The proposed houses meet or exceed the applicable minimum overall floor areas, room sizes, storage and private amenity requirements. Detailed compliance is demonstrated in the accompanying architectural drawings, Housing Quality Assessment and Schedule of Accommodation prepared by O'Mahony Pike Architects.

Urban Development & Building Heights Guidelines for Planning Authorities (2018)		*Urban Development & Building Heights Guidelines for Planning Authorities (2018) outline wider and strategic policy considerations and a more performance criteria driven approach that planning authorities should apply alongside their statutory development plans in securing the strategic outcomes of the National Planning Framework.*
Section 3.1 - Development Management Principles 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: 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? 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? Where the relevant development plan or local area plan pre-dates these guidelines, can it be demonstrated that 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? **SPPR 3** 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. (B) In the case of an adopted planning scheme the Development Agency in conjunction with the relevant Planning Authority (where different) shall, upon the coming into force of these guidelines, undertake a review of the		**Applicant's Response** The amendments retain the overall development framework established under the parent permission and provide an efficient use of appropriately zoned residential lands within the planned expansion area of Arklow. The proposed scale and height are appropriate to the site's location and planned character and are consistent with the wider urban design and placemaking strategy for the SLO4 lands. The proposals in this case comprise of 2 storey houses, along with a 4 storey building comprising a creche at ground floor with apartments above. The proposal is considered to accord with the relevant development management principles of the Guidelines and the applicable provisions of SPPR 3.

planning scheme, utilising the relevant mechanisms as set out in the Planning and Development Act 2000 (as amended) to ensure that the criteria above are fully reflected in the planning scheme. In particular the Government policy that building heights be generally increased in appropriate urban locations shall be articulated in any amendment(s) to the planning scheme (C) In respect of planning schemes approved after the coming into force of these guidelines these are not required to be reviewed. In this case, it is the provisions of SPPR 3(A) that apply.	
Section 3.2 Development Management Criteria **At the Scale of the Relevant City / Town** The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport. 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, protection of key views.3 Such development proposals shall undertake a landscape and visual assessment, by a suitably qualified practitioner such as a chartered landscape architect. On larger urban redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, 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.	**Applicant's Response** The proposed development contributes positively to the planned growth of Arklow by delivering a compact form of residential development together with the supporting movement, open space, community and recreational infrastructure required to establish a sustainable neighbourhood. The scale and height of development respond appropriately to the site's location, topography and planned residential character. The development provides variation in building form and typology and establishes a clear hierarchy of streets and public spaces, contributing positively to placemaking and visual interest.
At the Scale of District / Neighbourhood / Street The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape. 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 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 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. The proposal positively contributes to the mix of uses and/ or building/ dwelling typologies available in the neighbourhood.	**Applicant's Response** The development avoids monolithic building forms through the provision of a varied range of houses, duplexes and apartments and through variation in scale, form, architectural treatment and landscaping. Buildings are positioned to appropriately define and overlook streets and public open spaces, providing passive surveillance and a clear distinction between public and private areas. The development also contributes to housing choice through the provision of a range of dwelling types and sizes and retains the wider mix of childcare, education, neighbourhood, community, recreation and open-space uses within the overall development framework.
At the Scale of the 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.	**Applicant's Response** The form, massing, orientation and separation of buildings have been carefully considered to provide an appropriate standard of daylight and sunlight for future residents while protecting the amenity of adjoining properties.

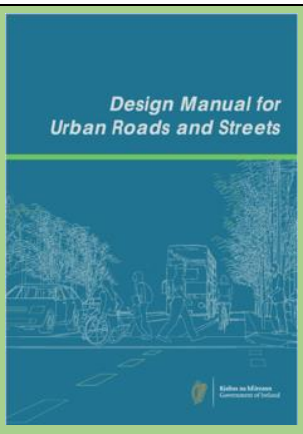
Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guides like the Building Research Establishment's 'Site Layout Planning for Daylight and Sunlight' (2nd edition) or BS 8206-2: 2008 – 'Lighting for Buildings – Part 2: Code of Practice for Daylighting'. 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 development has been subject to a detailed Sunlight and Daylight Assessment prepared by Digital Dimensions. The assessment considers the performance of the proposed development having regard to the relevant guidance and demonstrates the acceptability of the proposed layout in daylight and sunlight terms.
Specific Assessments To support proposals at some or all of these scales, specific assessments may be required and these may include: • Specific impact assessment of the micro-climatic effects such as down-draft. 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. • 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. • An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links. • An assessment that the proposal maintains safe air navigation. • An urban design statement including, as appropriate, impact on the historic built environment. • Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	**Applicant's Response** Refer to the Architectural Design Statement and associated drawings, prepared by O'Mahony Pike Architects, Landscape Design Statement, prepared by Doyle & O'Troithigh, Sunlight and Daylight Assessment, prepared by Digital Dimensions, Appropriate Assessment Screening Report and Ecological Impact Assessment, prepared by Altemar, Archaeological Impact Assessment, prepared by DeFaoite Archaeology, Acoustic Design Statement, prepared by TEM Consulting, and engineering and drainage reports and drawings and transport assessments, prepared by Waterman Moylan Consulting Engineers.

National Sustainable Mobility Policy		*The National Sustainable Mobility Policy sets out a strategic framework to 2030 for active travel and public transport to support Ireland's overall requirement to achieve a 51% reduction in carbon emissions by the end of this decade.*
Support People Focused Mobility by: - • Continuing to make existing and new walking, cycling and public transport networks more accessible for all users. • Implementing a universal design approach in the design of walking, cycling and public transport infrastructure and in the retrofitting of older infrastructure.		**Applicant's Response** Pedestrian and cycle connections are integrated with residential areas, public open spaces, community and recreational facilities and the wider movement network. The design seeks to provide safe, convenient and accessible routes for users of different ages and abilities and supports the principles of universal design.
Support Better Integrated Mobility by: - • Adopting a transport-orientated housing development approach. • Identifying housing delivery areas within a 1 km distance of public transport stops with the best potential to grow.		Promotes accessible walking, cycling and public transport infrastructure and better integration between housing delivery, land use and transport. We refer the Planning Authority to the Mobility Management Plan prepared by Waterman Moylan Consulting Enginners.
Principles and Goals • **Better Integrated Mobility** 9. Better integrate land use and transport planning at all levels.		

The Planning System and Flood Risk Management (2009)		*The Planning System and Flood Risk Management (2009) 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.*
Applicant's Response A Flood Risk Assessment, prepared by Waterman Moylan Consulting Engineers has been set out in accordance with the Planning System and Flood Risk Management Guidelines for Local Government (2009) and accompanies this planning application. The Flood Risk Assessment generally concludes that: *"The subject site has been analysed for risks from tidal and fluvial flooding, pluvial flooding, groundwater, and drainage system failures due to human error or mechanical system failure. As the flood risk from all sources can*		

be mitigated, reducing the flood risk to low or very low, the proposed development is considered acceptable in terms of flood risk."

The site lies outside Flood Zones A and B as mapped in the Wicklow County Development Plan 2022–2028 SFRA. The site is therefore located within Flood Zone C, where the probability of fluvial flooding is low (less than 0.1% AEP, or 1 in 1000 years).

Design Manual for Urban Roads & Streets (2013)		*The stated objective of Design Manual for Urban Roads and Streets (DMURS) is to achieve better street design in urban areas. This will encourage more people to choose to walk, cycle or use public transport by making the experience safer and more pleasant. It will lower traffic speeds, reduce unnecessary car use and create a built environment that promotes healthy lifestyles and responds more sympathetically to the distinctive nature of individual communities and places. The implementation of DMURS is intended to enhance how we travel to and from business; enhance how we interact with each other and have a positive impact on our enjoyment of the places to and through which we travel.*

Applicant's Response

We refer the Planning Authority to the DMURS Statement, prepared by Waterman Moylan Consulting Engineers which sets out
how the layout of the proposed development is consistent with the Design Manual for Urban Roads and Streets.
The proposed development is consistent with both the principles and guidance outlined within the Design Manual for Urban Roads and Streets (DMURS) 2013. The scheme proposed is the outcome of an integrated design approach that seeks to implement a sustainable community connected by a well-designed street which delivers safe, convenient and attractive networks.

Childcare Facilities, Guidelines for Planning Authorities (2001)		*These Guidelines for Planning Authorities on Childcare Facilities (2001) provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals. Planning permission for premises for childcare had been identified as an area of concern for childcare service development. These Guidelines are intended to ensure a consistency of approach throughout the country to the treatment of applications for planning permission for childcare facilities.*
Section 2.4 of the Guidelines set out general standards for the land use planning issues related to childcare provision in Ireland. In relation to 'New Communities / Larger New Housing Developments', it is noted that *"planning authorities should require the provision of at least one childcare facility for new housing areas unless there are significant reasons to the contrary or where there are adequate childcare facilities in adjoining developments."* The Guidelines outline that childcare facility provision should be made on the basis of 20no. childcare spaces for every 75no. dwellings permitted in a scheme.		**Applicant's Response** The proposed development includes the provision of a creche (c. 711sqm) at ground floor of Apartment Block A with an estimated capacity of c. 135 childcare spaces, with a dedicated external play area (294sqm) We refer to the Architectural Design Statement, prepared by O'Mahony Pike Architects.