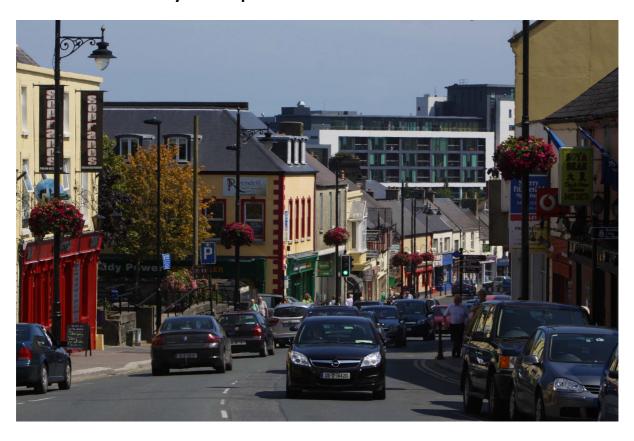


# **Submission**

On

# **New Wicklow County Development Plan**



**Garrett Dempsey** 

**Conor McCarthy** 

President

Commitee

10<sup>th</sup> January 2020

#### **INTRODUCTION**

Arklow, in common with many other towns in Co. Wicklow and further afield are still suffering the effects of the 2008 downturn and have not recovered in line with Dublin .

The comments herein could be reflected in Wicklow Town and to a certain extent Bray and to any similar sized town along the East Coast.

#### HIGH LEVEL PLANNING POLICY AND CONTEXT FOR ARKLOW

Arklow has a vibrant and strong historic core with a relatively dense outer suburban area.

The scale of residential expansion on the town since 2008 has been greatly curtailed with the lack of a sewage treatment plant but this is now resolved with construction scheduled to commence later this year.

Already we have seen a strategic housing imitative started for the Kilbride Lands to the North of the town.

There are a number of non-residential development projects scheduled for Arklow which will provide a balance:

- Arklow Primary Care Centre in the Main Street
- Arklow Shipping New Offices
- SSE Airtricity Windfarm Expansion
- Echelon Data Centre at Avoca River Park
- Arklow Courthouse redevelopment

These major developments are important along with the 100's of smaller investments made everyday by people in the town.

### **DEVELOPMENT OF THE TOWN CORE**

In common with all other similar sized towns Arklow Town Centre suffers from a lack of active use and development.

The current CDP places a large emphasis on preservation and development of retail with the Town Centre.

The 'Ireland 2040 Our Plan Draft National Planning Framework' widens out the debate as to what should be expected of the town centres.

We acknowlege retail is part of the mix but small scale residential development is just as important and the encouragement of residential, even at ground floor is logical and supportive of the existing retail. The recent changes to exempt development legislation for conversion from Commercial to residential is welcomed and a step in the right direction.

It is not realistic or financially viable to expect small infill town centre developments/ changes of use to compete with new suburban estates in terms of development standards, planning permission costs, RFI's, expert reports, traffic studies, flood reports, levies, bonds, SUD's, DAC's etc.

Submission: That the new CDP would give a presumption of planning for the repurposing of existing building stock and recognise the overall benefit of use versus vacancy and dereliction .

#### Planning Permission as a means of implementing development

Planning policy separate from financial considerations is a blunt instrument to encourage development.

Currently commercial buildings within the town core have a very low value and will be further lowered by the imposition of commercial rates on empty premises.

As the Central Bank has indicated that its Mortgage Prudential Rules are not going to change then capital appreciation in house prices is limited and development will have to happen within the current price structure and that means the cost of delivery has to be decreased.

Development simply cannot and will not happen if the figures are not right.

This is recognised nationally by the generous tax breaks afforded by the 'Living City Initiative' available in Dublin and elsewhere.

What is required is a 'Living Town Initiative'.

Submission: That the new CDP would recognise the very real costs associated with smaller Town Core Developments and operate policies to minimise

Local Authority costs including an extension of the Development

Contribution scheme Commercial rebate to non residential for smaller sites.

## **Planning Permission**

The current system of 'go' / 'no go' planning is not always suitable as essentially all eggs are in the one basket for the owner.

A more flexible approach in terms of temporary planning and limited duration planning (say 5/7 years) in conjunction of the above measures to allow more options and the actual effect of a particular development to be explored.

This would be of benefit for change of use of smaller units where long term use might revert to the original function.

Submission: That the new CDP would encourage use of temporary and planning permissions of limited duration where appropriate for smaller developments within the town core.