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|  | <h1>Arklow LPF Variation No.5</h1> |
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|------------------------|---------------------------|
| <b>Who are you:</b>    | Private Individual        |
| <b>Name:</b>           | Jonathan O'Toole          |
| <b>Reference:</b>      | ARKLPF-165620             |
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Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

## Local Planning Framework PART A Strategy

- A.4 Overall Strategy

## Local Planning Framework PART B Settlement Specific Objectives.

- B.1 Town Centre Regeneration

## Maps:

- Roads & Transportation Strategy Maps

[Upload a File \(optional\)](#)

JOT Variation No5 Submission 12.11.25.pdf, 0.66MB

Variation No 5  
Administrative Officer  
Planning Section  
Wicklow Co. Council  
Station Road  
Wicklow Town

Date: 12.11.2025

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## ***Variation No. 5 to the County Development Plan 2022-2028***

### ***Arklow Local Planning Framework***

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A Chara,

In relation to the above, please find enclosed my draft submission on the preparation of the Draft Arklow Local Planning Framework 2025.

## **1. Town Centre Regeneration**

It is encouraging to read that the Local Planning Framework (LPF) seeks to *“to reinvigorate commercial activity along the Main Street, it is important for the town centre to connect with the waterfront/riverside to exploit the assets of both without compromising their historical and environmental amenity.”*

The LPF highlights the public realm improvements that are required,

*“However the pedestrian environment along the Main Street and throughout the town centre needs to be improved not only to increase footfall, but to encourage those visiting the Main Street to stay a bit longer and enjoy it as an amenity, as well as a place to get errands and business done”*

While it states that *“it is imperative that the town centre is an attractive place to be by shifting the focus of the Main Street from one which facilitates the movement of vehicles to one which prioritises the movement of people.”*,

and it is acknowledged that high volumes of traffic passing over the 19 Arches Bridge and through the town centre needs to be reduced, it is surprising then that the framework discounts the construction of new vehicular infrastructure over the river to alleviate traffic congestion and focuses more on the addition of additional pedestrian bridges instead.

It should be noted that the existing 19 Arches Bridge is ideally located and provides a safe and secure route for pedestrians across the river. Proposing additional pedestrian crossings on either side of the existing bridge will not reduce car dependency or lower traffic volumes, but providing an alternative vehicular route around the town and inside the bypass will.

In relation to the Local Transport Plan, it notes the following issues for the town centre,

*“The impetus for pedestrians to cross the Nineteen Arches Bridge to utilise the shopping facilities and cafes on both sides of the River Avoca is diminished by the narrow footpath infrastructure on the bridge itself and the traffic volumes using this bridge.”*

The LTP further notes that,

*“There are a number of opportunities to improve the public realm of the Main Street and address the disconnect between the Main Street, the waterfront/south quay and Bridgewater Centre on the northern bank, however the reduction in through traffic in the town centre is the foundation to reaping the benefits of any improvements to the public realm.”*

- The footpaths to the bridge are over 1.8m wide with the bridge only refurbished several years ago to current safety standards.

- Reducing and redirecting the pedestrian traffic across the river will not solve the traffic volumes or congestion.
- The 19 Arches Bridge is a historical, iconic and protected structure and to safeguard its future, reducing traffic volumes and improving pedestrian movement should be an objective for the plan going forward. A pedestrian bridge at AT2 will impede the view of the 19 Arches bridge and detract from the iconic protected structure.

With the future expansion of the town in SLO3, SLO4 and SLO5 neighbourhoods and the potential for over 2,000 new homes in these areas alone, an additional vehicular bridge across the Avoca river must be considered.

The Arklow Environs Local Area Plan 2006-2012 prepared over 20 years ago under LAP Objective OT-5 stated, *“Consider during the lifetime of the plan, the development of a western road incorporating a new river crossing and linking to new interchange at N11 at Lamberton, subject to feasibility study”*

ARK82 of the 2025-2028 LPF now states ,

*“To require as part of a possible Western Distributor Road from Kilbride to the Vale Road, the development of a distributor road through SLO5 from the L-6179 to the northern boundary of Arklow Town Marsh at a location to be agreed with Wicklow County Council (RN 4)*

The addition of new vehicular bridge is no closer today than it was 20 years ago with the western distributor road proposed in the medium to long term goals.

## **2. Retail Core Map**

The Government has introduced new initiatives and policies like “Housing for all policy” and “Town Centre First” and “Rebuilding Ireland” to address vacancy and efficient use of existing building stock and to improve town centres as vibrant and attractive locations for people to live.

Chapter 5 of the current local area plan specifically references the decline in the town centre,

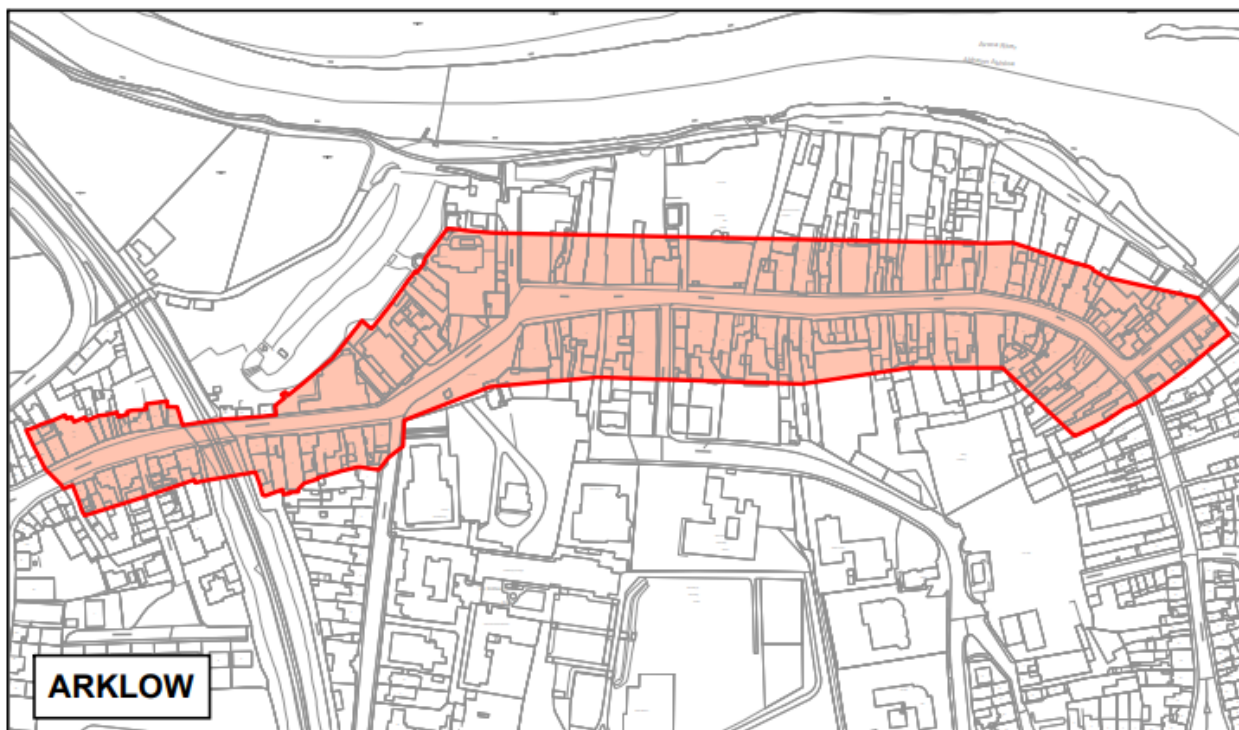
*“Traditionally the town centre consisted of a wide range of uses that included residential, retail, services, social and cultural activities. However with the development of the town and the increased use of the private car, most new developments in the town have occurred outside of the town centre. As a consequence there has been a decline in many of the traditional town centre uses. **This has the result that there are many areas within Arklow’s town centre that are in need of renewal and redevelopment.**”*

There are presently over 40 vacant commercial units within the town centre of Arklow

- **Over 10 vacant commercial units** to Upper Main St and Wexford Road.
- **Over 30 vacant commercial units** from Lower Main St. to the church on Main St.
- **8 vacant commercial units (27% vacancy rate)** in Bridgewater shopping centre. Despite being located within a purpose-built state of the art retail shopping centre with on-site parking and a much higher footfall than the town centre, they still struggle to attract commercial tenants.

Under the Wicklow Development Plan 2022-2028, the retail core of Arklow was reduced in size from the 2018 LAP map. While I understand that the council have to ensure that the central main street of Arklow remains commercial at its core, I would argue that the current and proposed retail core map is demonstrably wrong, seriously flawed, proportionally too large for a town and population of this size and not reflective of the actual retail centre of Arklow Town Centre.

**The retail core map for the town should be reduced in size and extend from Bridge St to the railway bridge on Upper Main St only.**



**2025 Arklow Local Framework Arklow Retail Core Area Map**

Please note the following anomalies with the current retail core map:

- The retail core of Arklow is the Bridgewater shopping centre and despite this, it is not included in the retail core zone map.
- The current retail core map has excluded Lower Main Street from the retail core zone in 2022, despite the fact it has a higher proportion of commercial street level units than Upper Main Street and is a far busier and active commercial part of town.

| Detail                                               | Total No. of Buildings | Total No. of Commercial      | Total No. of Residential | Comment                                                           |
|------------------------------------------------------|------------------------|------------------------------|--------------------------|-------------------------------------------------------------------|
| Lower Main St.<br>(Laffin's Lane to Bridge Street)   | 27                     | 21 (78%)<br><br>10 % vacancy | 6 (22%)                  | Predominately commercial street with approx. 80% commercial units |
| Upper Main St<br>(Railway Bridge to Roundabout Only) | 34                     | 21 (56%)<br><br>24% vacancy  | 15 (44%)                 | Much higher residential/ commercial mix                           |

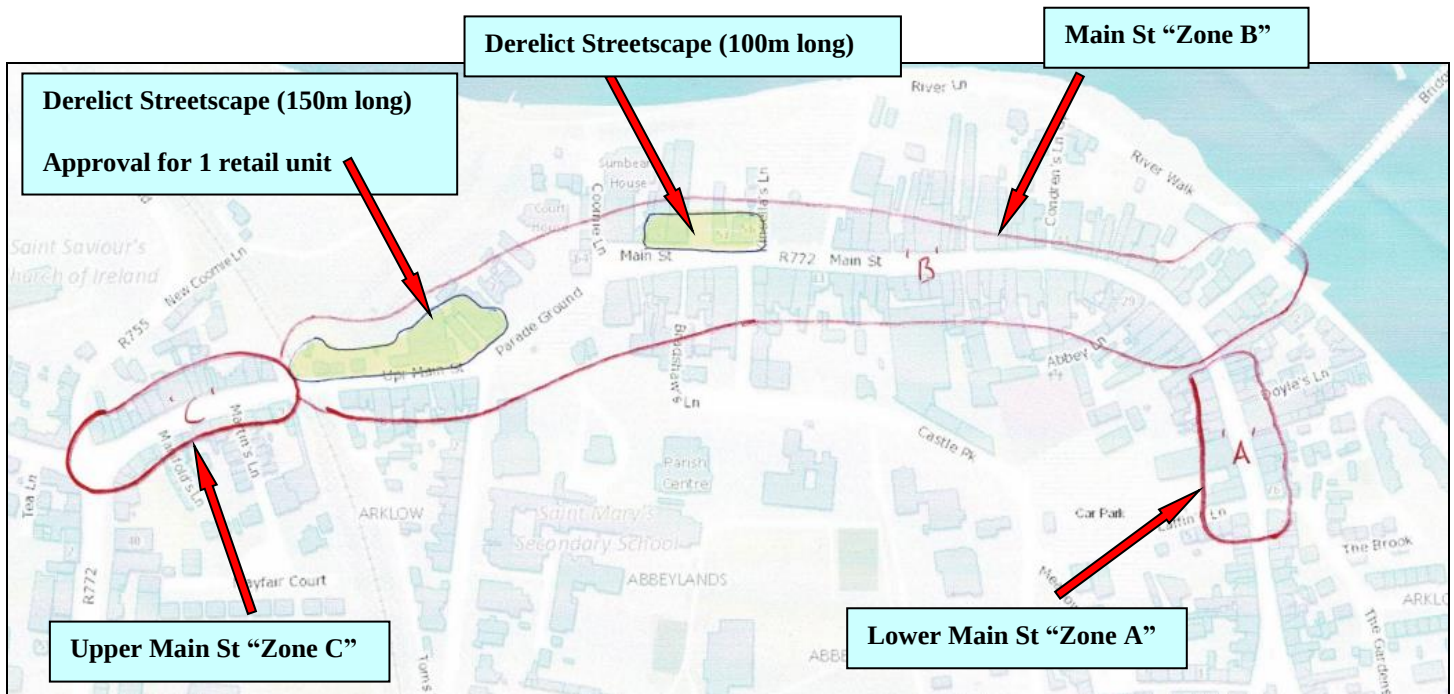
- The above figures highlight that the current retail core map is seriously flawed when Lower Main street is excluded and Upper Main street is still included. It is common knowledge that Lower Main street is a more commercially viable part of the town centre with more activity and footfall.
- There are 34 properties located on Upper Main Street between the railway line and the roundabout to the wexford road and the above table highlights that 44% are residential confirming that this part of the town centre has **a larger residential/commercial mix compared to the town centre retail core section of main street where over 94% of street level properties are commercial .**
- While Main Street is in serious decline ( over 250m of derelict streetscape alone) with a high number of vacant and derelict commercial units throughout, it is still busier than Upper Main St and so its removal from the retail core map would not fundamentally impact on the retail strategy for Arklow town.
- **It must be noted that the Alps development, with over 150m of prime retail road frontage was approved with only one retail shop to the entire town centre streetscape.**
- If a purpose built shopping centre has a high vacancy rate and a multi million euro town centre only proposes one retail shop to the entire streetscape, it informs you that commercial activity to Upper Main St will struggle going forward and by removing the retail core zoning from here, it will allow for greater flexibility in the existing building stock.
- Under the Retail Hierarchy & Strategy for County Wicklow, please note the following:
  - Arklow is defined as a level 3 town in the Retail Hierarchy & Strategy for County Wicklow. It has a population of 13,000 and the retail core map is approx. 1km long.
  - Greystones is also a level 3 town with a population of 18,000 and its retail core map is approx. 500m long.
  - Bray is a level 2 town with a population of 32,000 and its retail core map is approx. 1km long.

- Despite Arklow's population being dwarfed by Bray, it has a similar size retail core zone, while Greystones which also has a larger population, has a retail core that is half the size. Both Bray and Greystones retail core zones incorporate the town shopping centres and neither have the vacancy or dereliction at the centre of their respective retail zones like Arklow presently has.

I include the following map where I have broken the town centre into 3 distinct zones and provided a breakdown of commercial activity.

- A. Lower Main St (Laffin's Lane to Bridge St.)
- B. Main St (Bridge Street to Railway Bridge)
- C. Upper Main St (Railway Bridge to Roundabout)

| Detail         | Total No. of Buildings | Total No. of Commercial | Total No. of Residential | Comment                                                                      |
|----------------|------------------------|-------------------------|--------------------------|------------------------------------------------------------------------------|
| Lower Main St. | 27                     | 21 (78%)                | 6 (22%)                  | 4 in 5 units are commercial                                                  |
| Main St.       | 110                    | 103 (94%)               | 7 (6%)                   | High density of commercial units                                             |
| Upper Main St  | 34                     | 21 (56%)                | 15 (44%)                 | Greater proportion of residential properties than Lower or Main St. combined |



Arklow Town Centre "divided" into level of activity.

Providing a smaller more condensed retail core would present a positive approach to,

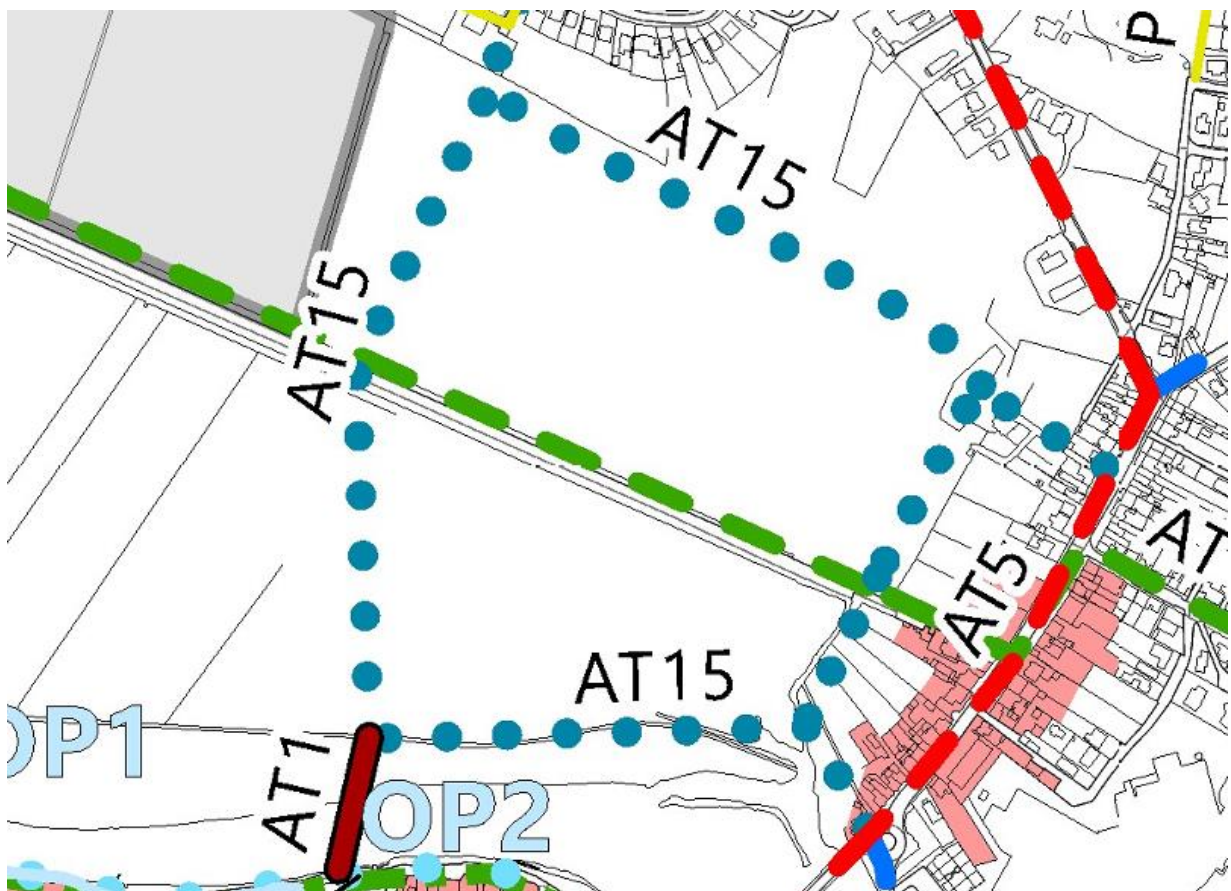
1. Improve the vibrancy to the town centre
2. Provide much needed residential properties in a housing crisis on the periphery of the town centre.  
This would promote town centre living and a sustainable use of existing building stock.
3. The proposed development would significantly improve the vitality and viability of Upper Main Street by facilitating a mix of uses and activities all of which help enhance the overall character of the town centre.

### 3. Active Travel Strategy – Arklow Marsh

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

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

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



2025-2028 Active Travel Strategy Map

- The above map shows a proposed marsh active travel link through and around the protected natural heritage wetlands. While I understand a planning application for a boardwalk over the marsh from SLO5 to connect to AT1 is under consideration with An Bord Pleanála, proposing a purpose-built walkway through the middle of a natural heritage area is at complete odds with protection,

enhancement and management of the undeveloped, protected natural heritage Marsh, its ecosystem and its zoning.

Under A4, Overall Strategy, it states that,

*To ensure that Arklow Town Marsh, Arklow Sand Dunes and Arklow Rock (proposed Natural Heritage Areas) and other environmentally sensitive sites are protected from adverse impacts arising from any new development and to carefully manage and control the extension of existing development in proximity to these areas. In particular transport proposals which traverse or infringe on the Arklow Town Marsh pNHA, shall be subject to a full Ecological Impact Assessment which fully assesses the potential ecological and environmental impacts of any such proposal on the Marsh during both the construction phase and operational phase of any such proposal.*

The LPF should focus its resources on improving the existing pedestrian routes and public realm instead.

I kindly request that the proposals raised above are given consideration in the preparation of the new local area plan.

Yours sincerely,

Jonathan O'Toole

Dublin Road

Arklow

Co. Wicklow