



Arklow Local Area Plan Submission - Report

Who are you:	Private Individual
Name:	Jonathan O'Toole
Email Address:	[REDACTED]
Reference:	ARKLAP-122457
Submission Made	April 2, 2024 12:46 PM

Topic

Compact Growth - Housing – Population Growth

Submission

see attached letter

Topic

Regeneration of Communities & Places - Healthy Placemaking - Urban Design - Opportunity Sites in Arklow

Submission

see attached letter

Topic

Economic Opportunity – Tourism - Shops & Services - Community Facilities

Submission

see attached letter

File

Arklow LAP Submission 28.03.24.pdf, 0.91MB

Arklow Local Area Plan Pre-Draft Submission

A Chara,

In relation to the above, please find enclosed my pre draft submission of the preparation of the local area plan for Arklow.

While I am pessimistic that these submissions make any difference to the thinking of the council, please note the following topics that I believe should be considered and adopted in the next local area plan for Arklow

1. Implementation of LAP

The council's inconsistent adoption and implementation of the current planning standards has resulted in public weariness towards planning and a subsequent rise in unauthorised development. The reality is that the public trust in the planning process is low when they see no consistency to its implementation from neighbour to neighbour.

Those who go through the proper channels are exhausted by the process while they witness unauthorised development go unpunished and rewarded financially. The housing crisis has seen the level of unauthorised development exponentially grow and go unchecked or punished. This is further exasperated when the same properties are rented through the public purse and at no times is the planning or fire safety status of the accommodation verified.

The preparation and adoption of a local area plan is necessary to ensure proper and sustainable development of the area. However, when there is a lack of consistency in the implementation of the plan, it

undercuts the public confidence in the process, and coupled with the lack of policing of unauthorised development has resulted in rampant disregard for the plans and standards.

The success of a local area plan is dependent on its consistent implementation and policing and I ask that this is given more authority in the next local area plan.

2. Housing

While the larger towns along the east coast have seen new build residential expansion over the past ten years and the subsequent social and economic benefits that this brings, Arklow has been left behind predominately due to the lack of wastewater treatment. Despite a new treatment plant nearing completion and ready for operation in 2025, over 165 new homes alone were refused in Dec 23/ Jan 24 on lands zoned for housing.

As Arklow is playing catch up on the rest of the county in terms of new housing developments, I ask that the council are proactive in their application of the new local area plan to assist, encourage and expedite planning for new housing development.

Ireland is presently in the midst of a huge housing shortage with Government introducing a number of new policies in the past year encouraging the reuse of vacant and derelict properties to help to alleviate the problem as buildings can be refurbished quicker and cheaper than new builds.

In relation to the existing building stock in the town, the local area plan should adopt a proactive approach to the reuse of existing vacant properties within the town centre as they provide no additional burden on town services.

3. Retail Core

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,

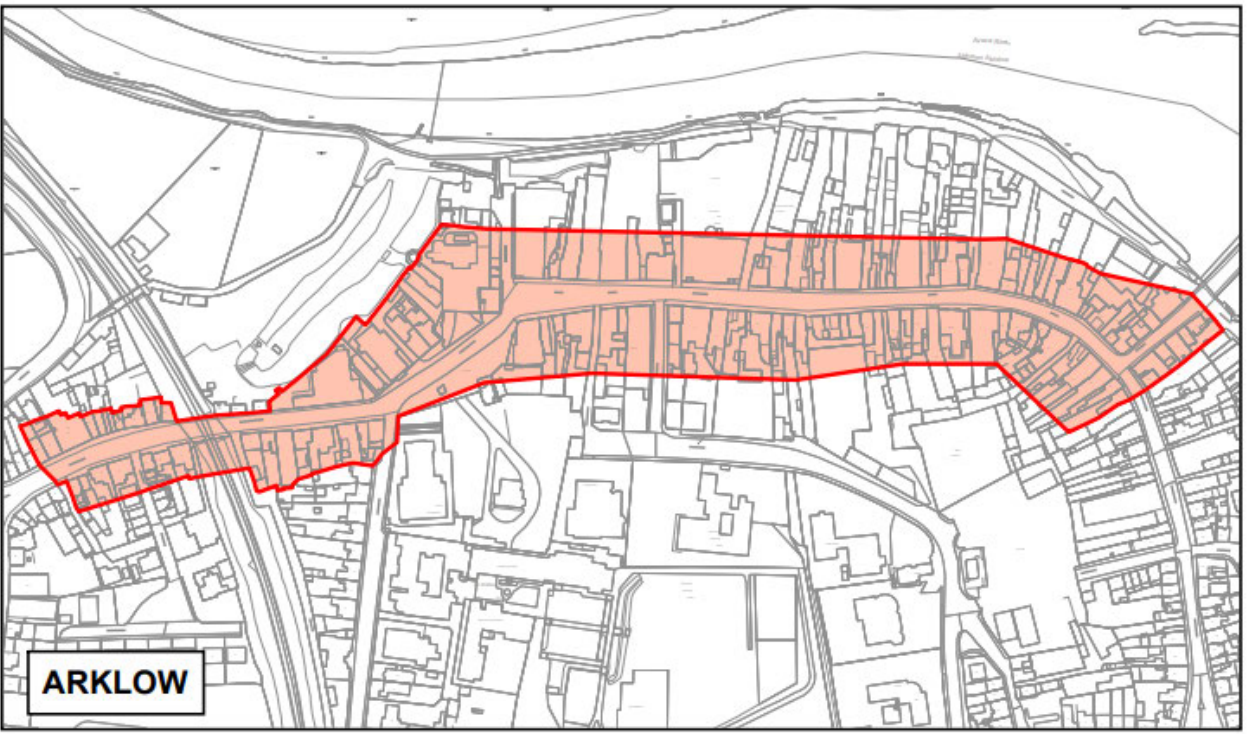
*“Traditionally the town centre consisted of a wide range of uses that included residential, retail, services, social and cultural activities. However with the development of the town and the increased use of the private car, most new developments in the town have occurred outside of the town centre. 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

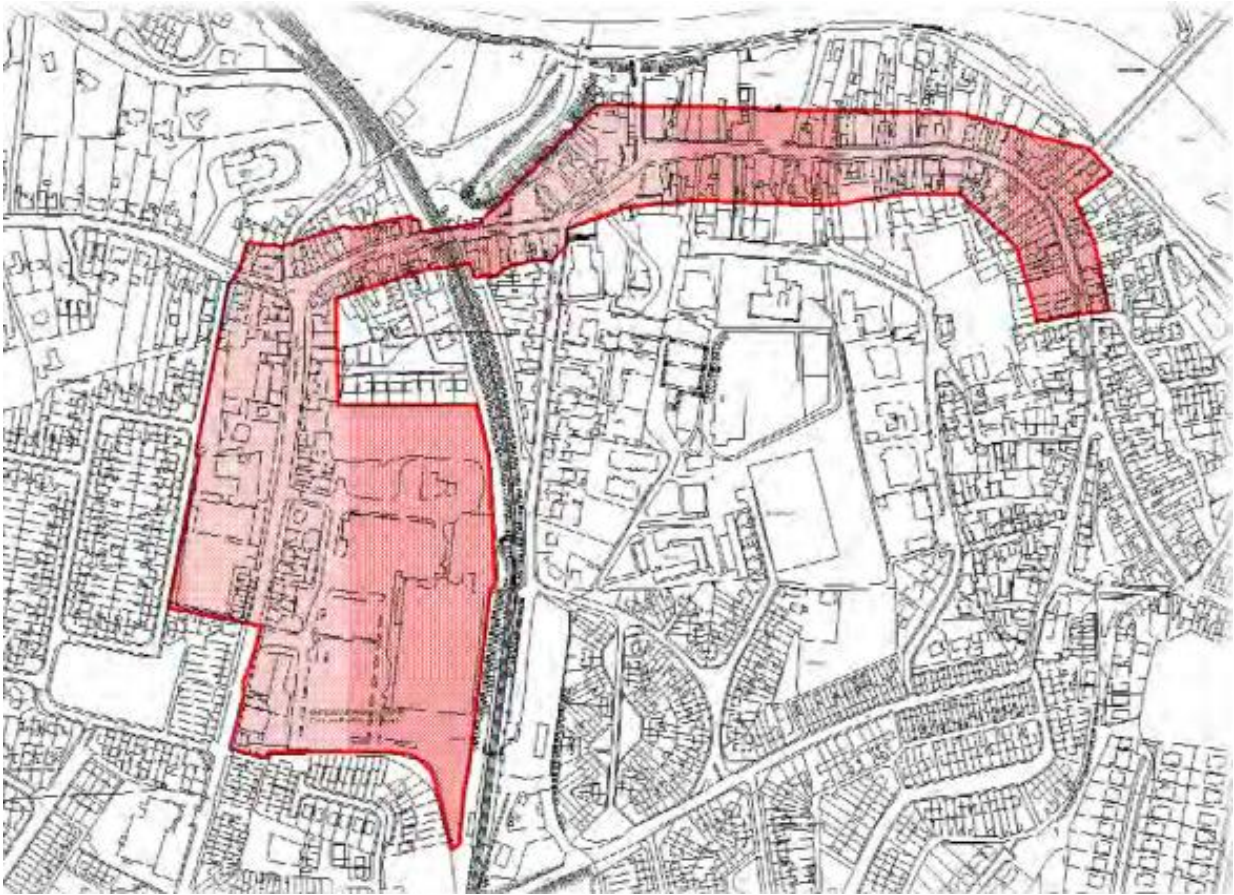
- **Over 10 vacant commercial units** to Upper Main St and Wexford Road.
- **Over 30 vacant commercial units** from Lower Main St. to the church on Main St.
- **7 vacant commercial units (23% vacancy rate)** in Bridgewater shopping centre. Despite being located within a purpose-built state of the art 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 current 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 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.



Wicklow Co. Development Plan 2022-2028 Arklow Retail Core Area Map



Arklow Local Environs 2018 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. (Laffin's Lane to Bridge Street)	27	21 (78%)	6 (22%)	Predominately commercial street with approx. 80% commercial units
Upper Main St (Railway Bridge to Roundabout)	34	21 (62%)	13 (38%)	Much higher residential/commercial mix

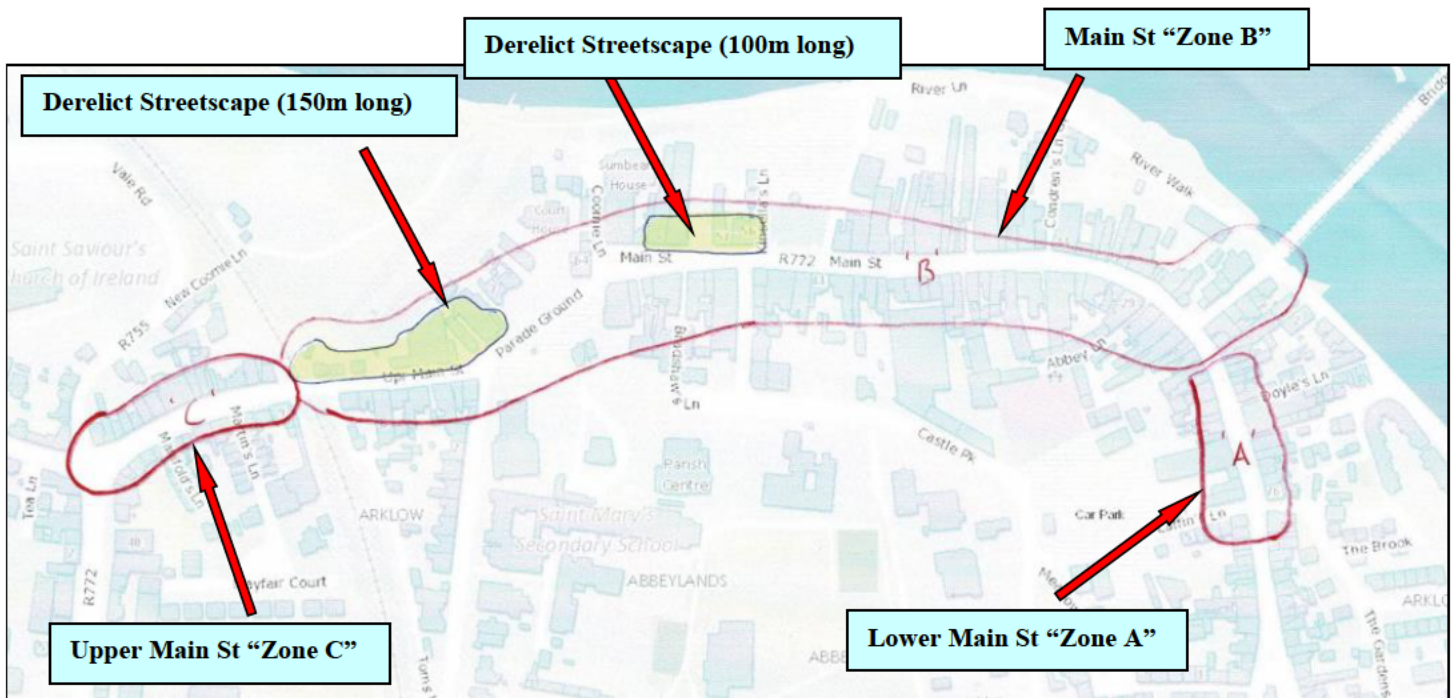
- The above figures highlight that the current retail core map is seriously flawed when lower main street is excluded and upper main street is still included. It is common knowledge that lower main street is a more commercially viable part of the town centre with more activity and footfall.
- There are 34 properties located on Upper Main Street between the railway line and the roundabout to the wexford road and the above table highlights that nearly 40% 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.

- 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 (62%)	13 (38%)	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.

4. Streetscapes/ Shopfronts

Heritage objective HT4 of the current local area plan states it is an objective *“to consolidate and safeguard the historical and architectural character of Arklow town centre through the protection of individual buildings, structures, shopfronts and elements of the public realm that are of architectural merit and/or contribute greatly to this character”*

Despite this, in recent years the traditional shopfronts and signage to the main street have been destroyed and replaced with inferior, cheap alternative signage unsympathetic to the character of the buildings or streetscape and a disregard for planning.

The new local area plan needs to set out for property owners a clear vision, set of standards and explanation of what changes require permission.

5. Enhancing the Public Realm

The current local area plans set out objectives to improve the public realm by *“Ensuring a vibrant town centre with a high-quality public realm;”* The recent Arklow Parade ground public realm works must be commended for the design, quality of materials and finish implemented. This standard and theme adopted here must now be the norm for all future public works.

Arklow Municipal District Council and Wicklow Co. Council should develop a public realm strategy for the main street and surrounding areas that provides guidance on specific design elements and details and develops a consistent materials palette to create a coherent image for the town centre with the quality of the detailing and implementation of the public realm being of an exceptional high standard.

By improving the public realm of the main street, this can be used as a catalyst to improve the commercial activity of the main street for the benefit of the town as a whole.



Unattractive large expanse of concrete hard landscaping



Inviting and appealing soft landscaping in Westport town centre

The photographs above show the contrast between an attractive public realm space in Westport and what Arklow has introduced in recent years.

Towns like Westport, Wexford Town, Kinsale and our close neighbours Gorey, have public realms that are inviting and attractive due to their consistent use of high-quality materials throughout their towns.

6. Green Spaces

Arklow benefits from an excellent geographical location on the coast with exceptional amenities within the town.

There are some green spaces still underutilised in particular the lands between Churchview and Rory O Connor place which could be developed to maximise their size and location.

The pitch and putt course on Seaview Avenue is another location that has potential to expand the amenities in this location which already boasts a nature walk, swimming pool, skatepark, leisure centre and athletic track. Developing the land into a mountain bike/ bmx track or similar for children would be a great introductory space for this sport with minimal changes to the existing natural landscape required to develop it.

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