

[REDACTED]

Sent: 13 January 2020 10:09
To: [REDACTED]
Cc: Rachel Rafferty; Planning - Plan Review
Subject: RE: Wicklow County Development Plan

A Chara,

I wish to acknowledge, with thanks, receipt of your submission regarding the County Development Plan review. As per our telephone conversation this is the submission for consideration.

Regards

[REDACTED]
Administrative Officer
Planning Control.

From: Rachel [REDACTED]
Sent: 10 January 2020 16:53
To: Planning - Plan Review
Cc: Rachel Rafferty
Subject: Wicklow County Development Plan

Please acknowledge receipt of the above submission for the current Wicklow County Development plan under the current public consultation period.

Regards,
William Quinn

Quinns of Baltinglass Ltd.
Main Street, Baltinglass, Co. Wicklow
[REDACTED]
W:www.quinns.ie

RE: Wicklow County Development Plan

Submission from: William Quinn, General Manager, Quinns of Baltinglass Ltd.

On behalf of Quinns of Baltinglass I would like to make a submission based on two points:

1. Clarifying location for Commercial Agricultural related commercial business development
2. Out of town Commercial Agricultural related business development – EXAMPLE SITE
3. Natural Gas Availability for Baltinglass.

1. Clarifying acceptable locations and land use zonings for Commercial Agricultural related development

Agriculture has traditionally been the most important contributor to rural economies in Ireland. Quinns is a business that is entirely agriculture in nature. It serves its farming customer base in a number of different ways.

Quinns would like the council to clarify in future development plans where businesses like Quinns should be appropriately located. This is so that Quinns can plan for future land holdings, for example where Quinns could move to, develop out or relocate to with clear unambiguous guidance and advice and understanding from the council.

As a third generation thriving family business Quinns will continue to expand, increase branch locations, increase employment and add to local investment. Our concern is that under the current development plan and planning guidelines our type of business does not fall nearly into one of the established and traditional land use zonings: in short it would appear that our type of business would be allowed nowhere if we were to look to expand or relocate part of our business. For example, if Quinns were to relocate in the Baltinglass area out of its existing 10 acre branch in Baltinglass, where would be an acceptable site or location in planning terms for a business of this nature?

In the current Wicklow Development plan in the "Economic Development Hierarchy" - in many of the rural based localities the plan lists **Local investment** as the main Investment Target (Table 5.2, page 6/Chapter 5). Quinns as a business want to expand, grow and invest locally. However, currently we feel that we are in a Catch 22 situation as we do not feel confident that any new proposed location for any new ventures/stores would be successful in planning. Uncertainty is the enemy and business confidence to invest. We would like the next development plan to give us this confidence through clarity and certainty.

Currently Quinns have 6 agristore locations across 4 counties. To help clarify our above request, let me outline what a typical Quinns business branch does and how we serve our customers:

- A Quinns Agri store sells all sorts of items that farmers require on a daily basis including the following: animal feed, fertilizer, sprays, seed, farming hardware, animal health, fuel, general hardware, gardening inputs, paint, DIY, pet and equine feed and homewares. Our primary customer base is farmers/small landholders and their families.

- Our sites are typically more than 5 acres in size and therefore require a significant land take (the Baltinglass branch is in excess of 10 acres)
- This is a similar setup to what other competitors of ours in the industry sell – the likes of Glanbia, Cooney Furlong, Red Mills, Grennans, Liffey Mills, etc.
- Our customers come to our branches in a vast array of vehicles (important for traffic/safety/noise concerns in built up areas). Examples are: Cars, jeeps, tractors and trailers, livestock trucks, artic lorries etc.
- Our suppliers typically involve HGVs and large tankers which arrive on a daily basis
- For short periods during harvest season we may need to open 24 hours 7 days a week due to grain intake (all weather related). This may involve tractors with trailers and artic lorries entering/exiting 24 hours as well as grain driers/grain intake facilities working 24/7.

When it comes to planning matters in Wicklow the issue arises that what we do above does not fall neatly into any of your typical classifications – and therefore leads to a business risk for Quinns to acquire lands, apply for permission for new ventures. This is because the odds are very much stacked against us getting a favourable decisions based on this lack of clarity and flexibility allowed for in existing development plans and existing land use zonings. For example – would a Quinns branch be classified as one of the following?

- **Retail** – typically zoned on a high street/town centre or retail park. From the above description of our business we would neither belong or be wanted on lands zoned retail
- **Industrial** – industrial estates usually are zoned around towns – again they are not suitable to us as they typically have standard sized units/plots and no where near large enough for the scale of our requirements.
- **Manufacturing** – again usually belonging in estates/parks assigned to industrial/light manufacturing - again not suitable for us
- **Retail Warehousing** – often promoted to locate within retail estates/industrial parks – again we do not belong there are need large scale sites – this definition is simply too narrow for what we do
- **Farm shop** – I believe this refers to a farmer farming his land and having a basic shop on site selling the food produce he harvests – clearly not what we do – we are not farming on site
- **Agriculture** – we are not farming in the above branch scenario – we are selling and buying agricultural related products but the council/objectors may say this is commercial not farming

The current development plan does include the following:

“Chapter 5 – Economic Development – Section 5.4 (iii) (a)

In accordance with sustainable planning principles, the priority location for new jobs growth shall be the existing town centres and existing developed lands (such as brownfield lands). In circumstances where the total jobs growth cannot be met within the existing town centre / brownfield lands or where certain uses are not suitable to locate in existing built up areas, this growth will be targeted to occur in ‘greenfield’ locations.

Only in exceptional circumstances should the above principles be contravened, for example, where a barrier to development is involved. Any exceptions must be clearly justified by local circumstances and such justification must be set out in any planning application proposal."

The plan also refers to "Leap frogging discouraged". In our case we would recommend we leapfrog to a greenfield site outside the town limits and the existing settlement plan boundaries.

Quinns would argue that as a business we are an exceptional circumstance. Could this not be included in a subsection within the new plan so that clarity can be given – rather than the currently situation where we need to "apply and see".

Wicklow is a strong agricultural county and Quinns as well as many other agricultural related businesses continue to grow in size, scale, complexity – all the while serving the local agricultural community which as you know has a huge trickle down/multiplier effect within local communities. In order for Quinns and others to continue growing and creating not only jobs but rates, levies and taxable profits we would encourage you to strongly include such an inclusion/clarification/strategy in your development plan. If you do not it leaves companies and businesses like ours in limbo; where can we expand to? what location could we move to? should we purchase some land/units on the hope of planning permission being granted?

2. Out of town Commercial Agricultural related business development – EXAMPLE SITE

See below for an example of a potential site for further Quinns growth/development. Could an area like this be even designated for such activity.

Example site:

Coordinates: 52°55'35.6"N 6°42'47.7"W (or 52.926565, -6.713255 in google maps)

Location name: Clough Lower, Baltinglass County Wicklow (marked The Friary on Googlemaps). See redline lands on map below.

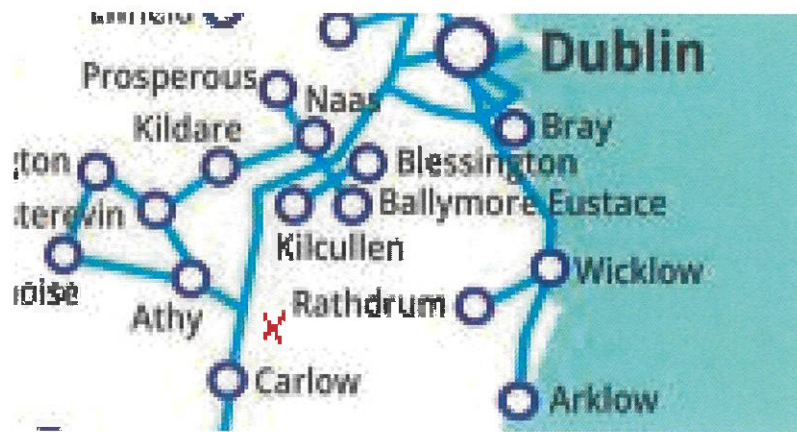


Reason site would be a suitable example for an out of/edge of town Commercial Agricultural related business development:

- Good road linkage/access to N81 and quick access to motorway via L3279. In time would also link to future planned R747 – N81 link road – ideal for keeping HGV/agricultural related traffic away from town centre
- Not near any area of conservation or archaeological interest and outside the settlement boundary of the town
- Not in any area of flood concern on flood zone map
- Adequate space required for a large scale agri related business development

3. Natural Gas Availability – Baltinglass

Natural gas is a clean and cost effective fuel. We would like to see the development plan aim to include a feed of natural gas coming into the West Wicklow corridor – specifically to Baltinglass. See map below for current gas pipelines in and around Wicklow (Red X = Baltinglass):



Link for national gas pipeline map: <https://www.gasnetworks.ie/corporate/company/our-network/pipeline-map/>

Quinns feed mill and grain processing facility on Mill Street Baltinglass is a huge user of energy and would benefit greatly from access to natural gas. As part of our 2017 development of our feed mill (€4M invested – only pellet mill within 4 counties) we had to invest in a new ESB sub power station (no grant/subsidy) as the towns existing power supply would not have been able to cope. The lights in Baltinglass houses would have flickered every time we hit high production if we had not had the resources to invest in this. As a county who is striving to attract larger business investment from outside the county (and internationally) this kind of lacking infrastructure is simply not good enough. If we were not a native Baltinglass business with a local site, we simply would have looked further afield to Carlow or Kildare to acquire a more suitable location for our mill.

As you can see from the map above – the gas lines currently serve Blessington, Ballymore Eustace and Carlow. With Wicklow bordering County Carlow only a few miles from Baltinglass, an extension from the Carlow line may be more viable than extending the lines south from Ballymore/Blessington.

In order to attract more larger scale businesses in manufacturing and industry (who will require natural gas, high speed broadband, good road links etc) in the future we would strongly encourage you to include natural gas availability in West Wicklow/Baltinglass area in the development plan strategy.