



Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	J. P. & M. Doyle Ltd
Reference:	DBLESSLAP-140434
Submission Made	December 6, 2024 2:06 PM

File

Draft Plan Sub 06.12.2024.pdf, 1.97MB

6th December 2024

Blessington LAP [Variation No.3]

Administrative Officer

Planning Department

Wicklow County Council

County Buildings

Station Road

Wicklow Town

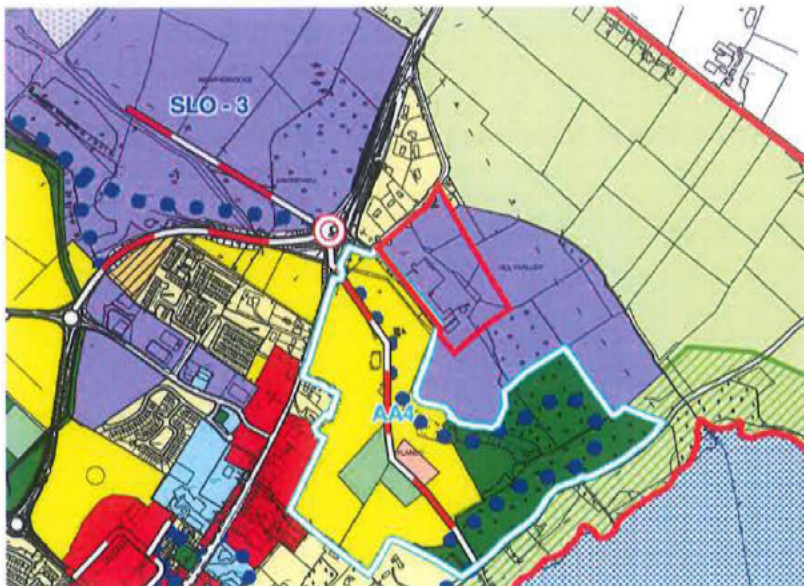
Co. Wicklow

A67 FW96

Re: Draft Blessington Local Area Plan 2025

Dear Sir or Madam,

This is a submission on behalf of *J. P. & M. Doyle Ltd*, [REDACTED] that own and operate Blessington Mart at Holyvalley, Co. Wicklow, W91 Y667. Their property extends to 5.22 hectares, it is currently zoned for employment/proposed employment uses in the Blessington Local Area Plan 2013 – 2019 and it is shown outlined red on the attached extract from Map 1: Land Use Zonings:



Blessington Mart has been operated by our client since 1956. It was originally located on a 3 acre site off Main Street, Blessington but it was forced to close that location due to objections from neighbours due to the small size of the site and the consequent congestion. Our client purchased their current site, which was an

old quarry, off the Dublin Road in 1960 in order to sustain and grow the business. A large site of c. 12.9 acres (5.22 ha.) was bought to address congestion issues and to provide room for future expansion.

A new mart premise was constructed at Holyvalley and the mart moved to this location in 1965. Since then, the facility has expanded on a number of occasions to keep pace with growth and to maintain up to date facilities. The foul drainage (septic tank) and water treatment tank for the Mart are both located on that part of the mart site which the Council proposes the down zone from employment to OS2. The current facility is again under pressure to expand and our client will require their entire site zoned for employment to facilitate further growth.

From the draft LAP and as shown on the following extract from Map No. 1: Land Use Zoning Objectives, it is now proposed to re-zone c. 2.5 hectares of the existing Blessington Mart from employment/proposed employment to OS2 Natural Areas:



In addition to the proposed down zoning, an indicative cycling and pedestrian link at the southern/rear boundary of Blessington Mart is shown on Figure B.8.5 and an indicative pedestrian/cyclist route (greenfield/brownfield) through the Mart site is shown on Map No. 6: Active Travel Strategy.

Our client requests the following changes to the draft LAP are identified as proposed material amendments by the Council Members:

1. Re-zone c. 2.5 ha. of OS2: Natural Areas to E: Employment [**Proposed Amendment 1**]
2. On Figure B.8.5, omit the indicative cycling and pedestrian link at the southern/rear boundary of Blessington Mart [**Proposed Amendment 2**]
3. On Map No. 6: Active Travel Strategy, move the indicative pedestrian/cyclist route (greenfield/brownfield) off the Blessington Mart site and onto the adjoining OS2 lands to the northeast [**Proposed Amendment 3**]

Proposed Amendment 1

The proposal to downzone the employment lands at Blessington Mart to OS2 Natural Areas should be reversed for the following reasons:

- (i) First and most importantly, the significant reduction in the existing zoned land directly affects our client's ability to address and implement future growth requirements at the Mart. This site with the potential for expansion was specifically selected over 60 years ago to relocate the Mart from a previous town centre location. That site selection has proven to be excellent long-term planning by our client and it remains critical to the on-going viability of the Mart that its entire property is zoned for employment use.
- (ii) The proposal to downzone the land is not consistent with the draft LAP's recognition that *"Economic development and employment is one of the key elements in delivering sustainable communities."* Further, the draft LAP seeks *"to promote the intensification of activities on existing employment sites and to take advantage of the existing economic assets of the town in order to stimulate further development within the area."* As it stands, there is a high rate of commuting out of Blessington for work, which will continue if the Council does not zone sufficient land for employment development such as our client's land within the Blessington Mart property.
- (iii) Following on from the previous point, a comparison between the draft LAP and the 2013-2019 LAP shows that it is now proposed to significantly reduce the extent of employment zoned land at Blessington from 94.4 ha. (per Table 4.2 in LAP 2013-2019) to only 62 ha. (per Table 4.1 in draft LAP). The loss of over 34% of the existing employment zoned land will materially affect the opportunities for new employment in Blessington including at the Mart. There is no planning justification for this reduction, which would prevent any scope for expansion at the Mart and it would significantly reduce the market for employment growth due to fewer sites being zoned and the inequitable provision of 41.9 ha. of undeveloped employment zoning at the former quarry lands.
- (iv) The draft LAP states Blessington Mart *"serves as an important marketplace and employment attractor for the wider area around Blessington."* The draft LAP is correct but the proposal to downzone land would severely compromise and threaten the future viability of the Mart at this location. The provision of undeveloped employment zoned land at the Mart provides for the potential development of over 110,000 sq.ft. (10,000 sq.m.) additional floor area¹ with a consequent provision of between 130 and 150 additional employees at the Mart and indirectly associated with persons attending the Mart. The Mart is a longstanding employer at Blessington and its future must be protected through the reinstatement of the employment zoning at their property.
- (v) Finally, the rationale for OS2 natural areas stated on page 65 of the draft LAP is that *"Where there is existing undeveloped lands, and the development of these lands is not essential for the achievement of the development vision and strategic objectives for the town, the land will be zoned 'OS2' – natural areas"*. The three strategic objectives per section A2.0 of the draft LAP are healthy

¹ 25,000 sq.m. of zoned land using a plot ratio of 0.4 = 10,000 sq.m.

placemaking, climate change and economic opportunity. The proposed OS2 lands at the Mart form part of the historic planning unit of the Mart, they are actively used in the operation of the Mart, and foul drainage and water services are within the proposed OS2 lands. The existing employment zoning is essential for the future economic opportunities associated with the Mart and therefore should not be considered for OS2 natural areas zoning.

Proposed Amendment 2

Following on from the request to reinstate the employment zoning at the Mart, there is no planning reason to retain an indicative pedestrian and cycling link into the Mart as shown on Figure B.8.5. On the assumption that the OS2 zoning to the northeast of the Mart is retained, it would be more appropriate to show the indicative link into that OS2 land as opposed to the reinstated E employment lands at Blessington Mart.

Proposed Amendment 3

The lands at the Mart site identified for OS2 are historically part of the overall planning unit for the Mart and do not have any key green infrastructure that would justify the proposed OS2 zoning objective - see Map No. 3: Key Green Infrastructure in the Draft LAP. There is a green corridor adjacent to the northeastern boundary of the site and it occurs to us that it would be a more suitable location for the indicative pedestrian/cyclist route (greenfield/brownfield) as opposed to through the Blessington Mart site. Our client does not object in principle to active travel proposals but the indicative location on their property is not compatible or appropriate with the existing agri-commercial facility.

Summary and Conclusion

Our client is one of the longest businesses in Blessington, employing a large workforce and offering a service to the farming community both locally and nationally and any restriction to the expansion of Blessington Mart will jeopardise the future of the business. The draft LAP seeks to re-zone parts of the existing premises to OS2 Natural Area which is not consistent with the existing operation of the property, there is no planning justification for the proposed zoning, and it would significantly restrict development of this business contrary to the employment objectives of the draft LAP.

Having regard to the above, the Council Members are respectfully requested to agree three proposed material amendments to the draft LAP namely (i) Re-zone c. 2.5 ha. of OS2: Natural Areas to E: Employment; (ii) On Figure B.8.5, omit the indicative cycling and pedestrian link at the southern/rear boundary of Blessington Mart; and (iii) On Map No. 6: Active Travel Strategy, move the indicative pedestrian/cyclist route (greenfield/brownfield) off the Blessington Mart site and onto the adjoining OS2 lands to the northeast

Please acknowledge receipt of this submission and direct all future correspondence to this office.

Regards,



Raymond O'Malley

Kieran O'Malley & Co. Ltd.

ROM: rom