



Draft Blessington Local Area Plan Submission - Report

Who are you:	Agent
Name:	Lidl Ireland GmbH
Reference:	DBLESSLAP-114350
Submission Made	December 11, 2024 12:13 PM

Topic

Overall Strategy of the LAP

Submission

Please see attached document. In short, our client principally requests three alterations to the Draft LAP, as follows:

1. That the Town Centre zoning be extended slightly to the North and East, to include the full landholding (more closely following the town centre pattern on the opposite side of the road) – this relates to both the Blessington LAP & Variation No.3;
2. That the 'Opportunity Site' designation for the subject lands be amended to a) reflect an extended Town Centre zone; and, b) be split in two to facilitate staged development of the overall Haylands landbank, rather than inadvertently tying a large landbank to a singular phase of regeneration; and,
3. That town centre and retailing policies (in particular but not limited to Objective BLESS4) be more closely aligned with high level retail policies, including those of the Retail Planning Guidelines, directing activity to the town centre as a whole.

Topic

Town Centre Regeneration / Retail / Opportunity Sites / TCF Plan

Submission

As above. In particular:

3. That town centre and retailing policies (in particular but not limited to Objective BLESS4) be more closely aligned with high level retail policies, including those of the Retail Planning Guidelines, directing activity to the town centre as a whole.

Topic

Economic Development

Submission

As above.

Topic

Land Use Zoning / Specific Local Objectives / Land Use Zoning Map

Submission

As above. In particular:

1. That the Town Centre zoning be extended slightly to the North and East, to include the full landholding (more closely following the town centre pattern on the opposite side of the road) – this relates to both the Blessington LAP & Variation No.3;
2. That the 'Opportunity Site' designation for the subject lands be amended to a) reflect an extended Town Centre zone; and, b) be split in two to facilitate staged development of the overall Haylands landbank, rather than inadvertently tying a large landbank to a singular phase of regeneration.

Topic

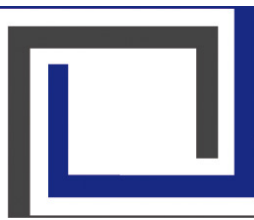
Proposed Variation No. 3 to the CDP

Submission

As above.

File

Lidl draftBLAP Submission.pdf, 0.66MB



"BLESSINGTON LAP" & "VARIATION NO.3" SUBMISSION

Administrative Officer, Planning Department,
Wicklow County Council, County Buildings,
Station Road, Wicklow Town,
Co. Wicklow, A67 FW96

Wednesday, 11th December 2024

[Via <https://blessington-wicklow.hub.arcgis.com/pages/submission>]

Dear Sir/Madam,

RE: SUBMISSION TO THE DRAFT BLESSINGTON LOCAL AREA PLAN AND VARIATION NO. 3 OF WICKLOW COUNTY DEVELOPMENT PLAN IN RESPECT OF LANDS AT HAYLANDS, DUBLIN ROAD, BLESSINGTON, CO. WICKLOW

1.0 INTRODUCTION & SUMMARY

The Planning Partnership, Chapel Street, Castlebar, Co. Mayo have been retained by Lidl Ireland GmbH, [REDACTED], to make this submission on the *Draft Blessington Local Area Plan* (dLAP) in relation to their lands at Haylands, Dublin Road, Blessington, Co. Wicklow, illustrated under Figure 1 below, measuring c. 1.13 hectares.

The subject lands generally relate to an assembled site including a residential and commercial plots. The lands are intended to be developed for a Lidl Foodstore, with ancillary and/or complementary uses as appropriate, all being subject to a detailed planning application in the short term.

In the interim however our client requests that the final Local Area Plan (LAP) be amended to avoid unintended consequences including potential difficulties with delivering on the underlying Town Centre objectives for the bulk of the lands.

Specifically, our client requests:

1. That the Town Centre zoning be extended slightly to the North and East, to include the full landholding (more closely following the town centre pattern on the opposite side of the road) – this relates to both the Blessington LAP & Variation No.3;
2. That the 'Opportunity Site' designation for the subject lands be amended to a) reflect an extended Town Centre zone; and, b) be split in two to facilitate staged development of the overall Haylands landbank, rather than inadvertently tying a large landbank to a singular phase of regeneration; and,
3. That town centre and retailing policies (in particular but not limited to Objective *BLESS4*) be more closely aligned with high level retail policies, including those of the Retail Planning Guidelines, directing activity to the town centre as a whole (as elaborated on below).

With the inclusion of the above amendments, we consider that the potential of the subject lands (as envisaged by the overall thrust of the LAP) can be realised. Lidl Ireland GmbH are committed to the subject site, having made considerable efforts in recent years to locate a store in the town, and have a strong track record in delivery of stores nationally, where planning policy and site availability align.

In the absence of the amendments proposed herein, the regeneration of the subject (and adjoining) lands would likely be inadvertently undermined for the lifetime of the LAP.

2.0 THE SUBJECT LANDS

The subject lands are comprised to two principal elements, including a) 'Haylands House' the residence to the northern part of the site and b) the southern part of the site which includes a number buildings and structures with former industrial / workshop use.

Lidl Ireland GmbH have acquired the lands, with the intention of seeking permission for the development of a Foodstore in the short term.

The lands are brownfield in nature and primarily within the town centre, adjoining a filling station to the south, the Roadstone Quarry to the East, residential use to the North and town centre uses (including adjacent Aldi store) to the West.

Figure 1: Subject Lands (Outlined in Red – Boundaries Approx.)



Source: GeoHive Maps, annotated by The Planning Partnership

2.0 STRATEGIC PLANNING CONTEXT

A number of strategic issues arise with respect to the potential development of the land, as follows (in part reiterating issues highlighted at pre-draft consultation stage).

2.1 Wicklow County Development Plan 2022-2028

The County Development Plan designates Blessington as a 'Core Region' Self-Sustaining Growth Towns, at 'Level 3' in the *Settlement Hierarchy* and which are described as *"Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining."*

This confirms an 'elevation' of the role of the town in the overall county strategy. In terms of retail hierarchy, Blessington is also at Level 3 (and *"Tier 1 – serving a wide district"*) of the hierarchy, a *'Town and /or District Centres & Sub County Town Centres'*.

The proposed retail strategy includes objectives to: *"reduce leakage of retail expenditure from County Wicklow to other counties; expand the level of convenience floorspace within the County, to meet the convenience shopping needs of existing and future residents up to 2031; [and] enable each centre to perform in accordance with its role and function as identified in the Retail Hierarchy and to allow a healthy level of competition between centres whilst ensuring that the role and function of each centre is not undermined."*

In relation to the scale and role of Level 3 Centres, the Plan notes that in such towns:

"These centres will vary both in the scale of provision and the size of catchment, due to proximity to a Major or County Town Centre, i.e. Bray or Wicklow Town... Supermarkets and smaller scale department store are required to meet local needs. It would be expected that financial and other services (banks and building societies) would be located alongside other retail services creating an active and busy centre..."

*Such towns / centres would **generally range in size from 10-25,000sqm of lettable retail space catering for a population of 10,000- 40,000.***

*Arklow, Blessington, Baltinglass and Rathdrum, while being very different in size, are all similar in the sense that **they serve a wide catchment and are sufficiently distant from Bray or Wicklow Town, so as to make them the principal shopping destination in their areas.**"*

[Our Emphasis]

In relation to Blessington, the Plan notes that:

*"**This town provides retail services to a wide rural catchment.** The town is **relatively well served by convenience shops including Supervalu, Aldi and Dunnes Stores.** The comparison offer is more limited and provided by small independent shops on the Main Street, a small number of new shops in the new town centre development and the comparison element of the Dunnes Stores unit. **It is the vision that Blessington will be the principal shopping and service destination for its wide catchment area.**" [Our Emphasis]*

As set out below, the reality of retailing in Blessington is somewhat different to the outdated references above, as there has been no real progression in recent years despite policies and objectives calling for such.

Preservation of the status quo is not the intention of the Development Plan, or its predecessor, hence the final LAP should include sufficiently proactive (and achievable) policies and objectives.

2.2 Draft Blessington Local Area Plan 2024-2030

The Draft Local Area Plan (dLAP) includes relevant objectives, including but not limited to the following:

A2.3 Town Centre Development

Level 3 town centres perform a variety of roles and functions for their residents and their wider rural communities. The strengths of these settlements lie in their capacity to accommodate a mix of uses including employment, residential, community and other functions in a compact walkable environment that provides a high quality of life. They are a hub for social, economic and administrative functions in addition to providing places for recreation, worship and leisure.

Blessington, like many towns across all tiers of the hierarchy in County Wicklow, has experienced significant challenges to retain vibrancy and vitality. The National Planning Framework and the County Development Plan place a strong emphasis on strengthening Ireland's urban structure by targeting both population and employment growth in urban areas, promoting urban infill and brownfield development and ensuring that towns and villages are attractive, liveable, well designed, high quality places that are home to diverse and integrated communities that enjoy a high quality of life and wellbeing.

The retail function of Level 3 towns is as set out in the County Retail Strategy, and it is considered to fulfil the role of a 'sub County' town centre, serving a wide district. Retail is a key function of Level 3 towns and a thriving retail sector is essential to maintain vitality and vibrancy in the core areas of the town and to maintain the town as the focal point for the wider rural area in which it is located.

Towns and villages are continually evolving. This is essential for their survival. It is important that Wicklow's planning policy is flexible to allow town centres to evolve and diversify. The planning policy for Level 3 town centres like Blessington will therefore be based on the following objectives:

Town Centre & Retail Objectives

- To support the continued enhancement of Blessington Town Centre as the heart of the settlement, where people of all backgrounds, ages and abilities can avail of services and interact within their communities;*
- Ensure that the town centre is an attractive places to live in, to work in and to visit, easy to get to, easy to walk and cycle within and is a competitive place to conduct business;*
- Create a compact town by reusing existing buildings and maximising the potential of infill and brownfield sites; use all mechanisms and processes available to drive forward the redevelopment and regeneration of vacant, underutilised and derelict sites;*
- Use public realm improvements to stimulate investment and economic confidence; encourage public art in publicly accessible spaces such as town streets and squares and along existing or future parks and amenity routes;*
- Promote healthy placemaking and prioritise walking and cycling; improve linkages between core town centre and existing community infrastructure and lands earmarked for future housing development;*
- Embracing the historic character and heritage attributes of the town centre and strengthen the strong sense of place;*
- The redevelopment of lands within the town core area, particularly those sites with frontage onto the main streets and squares of Blessington, shall provide for street fronting buildings of a high quality design or for a high quality urban space, including hard and soft landscaping, and appropriate street fixtures and furniture, in order to enhance and create a more attractive streetscape;*
- To allow a relaxation in certain development standards in the town centre zone in the interest of achieving the best development possible, both visually and functionally while maintaining the highest quality of design in all new developments;*
- Facilitating a diverse mix of uses, and particularly encourage residential usage at appropriate town centre densities, and the concept of 'living over the shop';*

- Facilitate an expansion of retail floorspace to reduce leakage of expenditure from both the town itself and the wider County. Guide and promote the expansion of retail floorspace first and foremost within the core retail area and thereafter in accordance with the sequential approach to retail development;
- Provide for an expansion in the variety of retail and retail service facilities so that the town includes a range of retail outlets that provide for the day to day needs of the local population and the needs of other businesses and tourists, in accordance with the provisions of the "Retail Planning Guidelines for Planning Authorities" (DoEHLG 2012), and any subsequent Ministerial Guidelines or directives and the Wicklow County Retail Strategy.

Retail in Blessington

The County Development Plan sets out the retail hierarchy for the County in line with the Regional Spatial and Economic Strategy. New retail provision should accord with the County Development Plan retail hierarchy. Retail development should be appropriate to the scale and function of the settlement it is located in. Blessington has been identified as a Level 3 Town Centre (Key Service Centre) in the County Wicklow Retail Hierarchy and Strategy. This section sets out the objectives for the sustainable development of Blessington Town Centre that are relevant to and implementable through a local land-use plan.

Blessington provides retail services to a wide rural catchment. The town is relatively well served by convenience shops including Supervalu, Aldi and Dunnes Stores. The comparison offer is more limited and provided by small independent shops on the Main Street, a small number of new shops in the new town centre development, and the comparison element of the Dunnes Stores unit. It is the vision that Blessington will be the principal shopping and service destination for its wide catchment area.

Blessington is fortunate in that retail uses are currently concentrated within Blessington Town Centre, with no large out-of-centre retail activity. The current, and envisioned, spatial extent of Blessington does not indicate that such out-of-centre or 'neighbourhood centre' retail areas are currently required or desirable.

The retail needs of Blessington and the wider area should ideally be accommodated within the Core Retail Area within the town centre, as set out in the Wicklow County Development Plan 2022-2028. On that basis, the Blessington 'Core Retail Area' shall be considered the priority area for retail development, while the remainder of the town centre (as zoned for such purposes) will constitute an area of secondary priority for retail development. The development of retail floorspace outside the town centre will not be encouraged.

The County Development Plan sets out a wide range of town centre regeneration objectives that will apply directly in Blessington. In addition, the following objectives shall apply in Blessington:

Town Centre Objectives

BLESS1 To support and facilitate activities and developments that will improve the vitality, connectivity and vibrancy of Blessington Town Centre.

BLESS2 To encourage the development of infill sites and back lands within Blessington Town Centre in a manner that preserves/creates fine grain building plots and presents strong urban frontages to existing and proposed streets. Active frontages at ground floor level will be encouraged. Traditional arches on Blessington Main Street should be used/reused as primarily pedestrian and cyclist passages to back lands, with vehicular traffic accessing plots from alternative locations if practical. Such areas include:

- *Opportunity Sites as identified in this plan and the Blessington Town Centre First Plan.*
- *Back lands of premises on Blessington Main Street facing onto Kilbride Road, between the junction with Blessington Main Street and the Rectory residential development, subject to the preservation of historic boundary walls and landscape amenity in relation to the Poulaphouca Reservoir.*

BLESS₃ To support and facilitate improvements to the public realm in Blessington Town Centre to provide an attractive, comfortable environment for pedestrians, cyclists and users of public transport. Such improvements could include the following:

- *Reductions in through traffic along Blessington Main Street*
- *The rationalisation and reconfiguration of car parking within Blessington Town Centre.*
- *The reconfiguration of traffic movements around Newtown Square.*
- *Improvements to the spatial and visual connectivity between Blessington Main Street, Market Square and Newtown Square*
- *The implementation of a comprehensive public realm scheme on Market Square and adjacent areas of Blessington Town Centre.*
- *The undergrounding of cabling along Blessington Main Street.*

BLESS₄ To direct retail development into the Core Retail Area as a first priority, as set out in the Wicklow County Development Plan 2022-2028 (or any update thereof), in line with its position in the County Retail Hierarchy & Strategy. This will be accomplished as follows:

- *There will be no quantitative restriction on the development of retail floorspace within the Blessington Core Retail Area.*
- *All developments for additional retail floorspace, which are both outside the Core Retail Area and within Blessington Town Centre (as zoned for such purposes), will be required to be accompanied by a Retail Impact Assessment in line with 'Guidelines for Planning Authorities – Retail Planning' 2012 and any updated or relevant guidelines.*
- *The development of retail floorspace outside of Blessington Town Centre (as zoned for such purposes) will not be facilitated unless absolutely necessary.*

BLESS₅ To promote the development of opportunity sites within Blessington Town Centre in accordance with the specific criteria set out for each identified area within this Local Area Plan. Regard should also be had to concept and access plans for opportunity sites as included in the Blessington Town Centre First Plan (or any update thereof)."

In summary, we note that the subject site is well placed to contribute to the achievement of many of the above objectives, in delivering town centre uses and activity.

We note the above confirming that "*towns and villages are continually evolving. This is essential for their survival.*" which we concur with, which emphasises the importance of realising the town centre and retail objectives for the town.

For the avoidance of doubt however, we submit that *BLESS₄* (and related text) should be amended somewhat (as set out in Section 3.7 below) to reflect that it is the town centre as a whole that will deliver on the objectives of the Plan, and not exclusively the Core Retail Area.

The emphasis at present is considered somewhat too narrow and rigid, hence we consider that this text of the dLAP is inconsistent with other elements of the dLAP such as that: "*It is important that Wicklow's planning policy is flexible to allow town centres to evolve and diversify*" and the sequential approach as set out in the Retail Planning Guidelines which is otherwise supported by the Planning Authority.

Whilst it is appropriate to have a degree of focus and specialism within the Core Retail Area, the designation of the Core Retail Area should not be such that it undermines or supplants the underlying purpose of the Town Centre zoning.

Furthermore, the focus of the core retail area should be clarified, given the significant role of Blessington as a regional centre, and the particularly small footprint of the core area. As such, food shopping is not necessarily the primary function of the finer grain core retail area. The function and role of Blessington town core is therefore primarily to operate at a higher level in the retail hierarchy, competing with other large centres and competing for comparison and non-retail / experiential / leisure and recreational spending.

The dLAP notes in this regard that *"the comparison offer is more limited and provided by small independent shops on the Main Street, a small number of new shops in the new town centre development, and the comparison element of the Dunnes Stores unit. It is the vision that Blessington will be the principal shopping and service destination for its wide catchment area."*

2.3 Draft Blessington Local Area Plan 2024-2030 (Zoning)

The dLAP proposes to essentially preserve the pre-existing zoning, as illustrated in Figure 2 below, albeit includes the site in an Opportunity Site designation (no. 8).

The subject site currently comprises three zoning objectives, principally Town Centre, with an element of Existing Residential and a small area of Mixed Use. Table 1 sets out the detail of the objectives.

Table 1: dLAP Zoning Objectives

Zoning	Objective	Description
RE: Existing Residential (c. 37% of the site)	To protect, provide and improve residential amenities of existing residential areas	To provide for house improvements, alterations and extensions and appropriate infill residential development in accordance with principles of good design and protection of existing residential amenity. In existing residential areas, the areas of open space permitted, designated or dedicated solely to the use of the residents will normally be zoned 'RE' as they form an intrinsic part of the overall residential development; however new housing or other non-community related uses will not normally be permitted.
TC: Town Centre (c. 61% of the site)	To provide for the development and improvement of appropriate town centre uses including residential, retail, commercial, office and civic use.	To develop and consolidate the existing town centre to improve its vibrancy and vitality with the densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure and residential uses, while delivering a quality urban environment, with emphasise on regeneration, infill town and historic centre conservation; ensuring priority for public transport where applicable, pedestrians and cyclists, while minimising the impact of private car based traffic and enhance and develop the existing centre's fabric.
MU: Mixed Use (c. 2% of the site)	To provide for mixed use development	The nature of the mixed use development envisaged for any particular site is set out in the text of the plan.

In terms of specific land uses considered in each zone, the dLAP states:

*"Uses generally appropriate for **residential (RN / RE)** zoned areas include houses, apartments, residential open space, education, community facilities, retirement homes, nursing homes, childcare, health centres, guest house, bed and breakfast, places of public worship, home based economic activity, utility installations and ancillary development and other residential uses in accordance with the County Development Plan (CDP) and Local Area Plan (LAP).*

*Uses generally appropriate for **town centre (TC)** include residential development, commercial, education retail, retail services, health, restaurants, public house, public buildings, hotels, guest houses, nursing / care homes, parking, office, tourism and recreational uses, community, including provision for religious use, utility installations and ancillary developments for town centre uses in accordance with the CDP and LAP.*

*Uses generally appropriate for any **mixed use (MU)** area will be specified in the plan."*

Figure 2: dLAP Land Use Zoning (Approx. Boundaries Outlined in Blue)



Source: Draft Blessington Local Area Plan 2024-2030

As illustrated above, the zoning pattern is less than optimal for the future development of the subject lands, with both the Existing Residential and Mixed Use areas being subsidiary in area and function to the primary Town Centre element.

As set out in Section 3.3 below, we propose that the zoning of the subject lands be unified under the singular zoning objective of Town Centre.

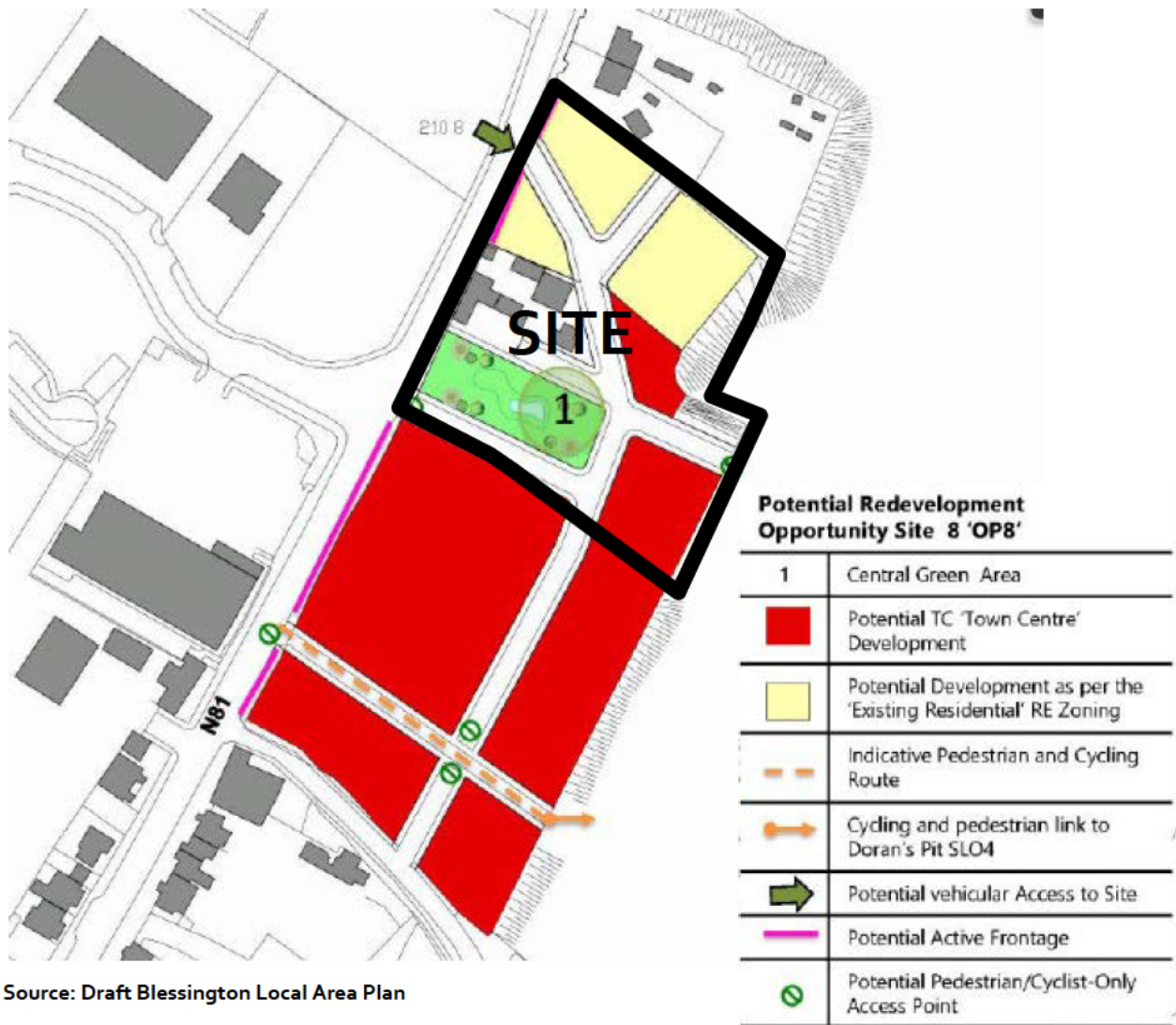
2.4 Draft Blessington Local Area Plan 2024-2030 (Opportunity Site)

In terms of the dLAP Opportunity Site designation, we note Figure 3 below which is relatively detailed in respect of a potential layout for the site. The designation also includes the following objective:

"Objectives BLESS OP8

- To provide for mixed use town centre infill development (which shall include residential use). Indicative block formats are provided in the below concept plan. Development should provide an appropriate architectural response to the Blessington Architectural Conservation Area, which is located a short distance to the south of the opportunity site.
- The redevelopment of this site shall provide pedestrian and cyclists routes (with two-way segregated cycle lanes) through the site to connect Blessington Main Street to any potential redevelopment of Doran's Pit.
- Redevelopment of this site should seek to retain vernacular buildings that are present and have regard to their massing, while new buildings along the western boundary should also providing strong urban and active frontages to Blessington Main Street."

Figure 3: Current dLAP Opportunity Site Concept Plan (Approx. Boundaries Outlined in Black)



Source: Draft Blessington Local Area Plan

A number of considerations arise:

- Desire lines East (non-vehicular) and South are apparent;
- Multiplicity of roads / streets;
- Preservation of existing vernacular buildings indicated;
- Suggestion of public open space area; and,
- Functional link to landbank to South introduced.

Overall, we consider that if the above approach were imposed on the subject lands it could materially undermine its developability for a Foodstore, and for substantive development of most forms.

It appears that the dLAP approach is to render the (available) subject lands as somewhat sacrificial to the (unavailable) southern extents of the opportunity site.

This is not in our opinion appropriate or proportionate to the orderly development of the town, where the subject lands should be able to contribute positively to the provision of development and services needed in the town.

Fundamentally, the Opportunity Site should in our opinion be separated into Southern and Northern sections and renumbered accordingly, as set out below in Section 3.5 below.

3.0 RATIONALE FOR PROPOSED AMENDMENTS

The following elaborates on the specific site context and proposed objectives relating to same.

3.1 Food Retailing in Blessington

We note that both the County Development Plan and dLAP state that *"the town is relatively well served by convenience shops including Supervalu, Aldi and Dunnes Stores"*.

These statements however mask the reality in Blessington, in terms of the absence of progress for a significant period of time. We note the 2016 County Development Plan made the same statement that *"the town is relatively well served by convenience shops including Supervalu, Aldi and Dunnes Stores."*

The 2016 County Development Plan nonetheless highlighted an allocation for a further 2,000 sqm in Blessington, which has not been realised, to any discernible degree.

Retailing in Blessington has thus been largely stagnant in the intervening decade since the previous LAP was adopted. The development of the Aldi store has been the most recent advancement of services, complete since c. 2012.

At the same time, Discount Foodstores have rapidly expanded their share of the market (according to the *Retail Planning Guidelines, 2012* (relying on data from February 2011), Aldi and Lidl had a combined market share of approx. 9.1% (or 5.5% and 3.6% respectively) compared to Tesco, Dunnes Stores and Super Valu (including Superquinn) combined share of 77.2%).

As of September 2024, however, the combined (national) Discount Foodstore share (Aldi & Lidl) has increased to 25.4%, whilst Lidl's share of the market has grown from 5.5% to 13.7% in the same period, an increase of 149% in the lifetime of the Guidelines.

In this regard Lidl Ireland GmbH have been actively seeking to locate and develop a site in Blessington for more than twenty years, with proposals at [Burgage More](#) and [Conways Field](#) being refused permission.

Lidl have carried out an exhaustive search for a location, with the subject lands emerging as the only (a) suitable (b) available and (c) viable location. As such, Lidl have committed to this location by purchasing the assembled lands.

We therefore respectfully submit that *the town is not adequately served by convenience shops notwithstanding the presence of Supervalu, Aldi and Dunnes Stores* as there has been no progression in the town in a significant period.

The *Retail Planning Guidelines* note that *"the third national policy objective is to ensure that the planning system continues to play its part in ensuring an effective range of choice for the consumer, thereby promoting a competitive market place. Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity."*

3.2 Convenience Retailing Patterns

As is now well-recognised, the COVID-19 pandemic has demonstrated the critical role of the Foodstore (Corner / Symbol Shop, Discount Foodstore / Supermarket, Superstore, etc.) as a strategic service that is needed locally rather than on an overly centralised basis.

This recognition is likely to be echoed in climate change adaptation strategies that will further emphasise the need to reduce the extent and intensity of patterns of travel for everyday purposes.

Again, the underlying principle to this was demonstrated during the COVID-19 lockdown periods of restricted of movement, where local shopping, where it was available, played an important role in facilitating the minimisation of travel.

The pandemic similarly demonstrated that Convenience shopping is highly exposed to change and a shift to online platforms. Where local access to physical stores is limited, this likely encourages and accelerates a transition to online shopping.

For instance, online food sales have increased significantly in recent years: "*with 18.4% of Irish households purchasing groceries online – up by 0.5%, year on year*".¹

There is also a considerable expansion of a variety of other services outside the traditional retailer delivery, including Deliveroo, Buymie, click and collect, etc. which further break the link with on site food shopping.

Widespread adoption of these 'arms-length' models are likely to have a dramatic and disruptive effect on the retail sector, which has already experienced significant impacts through recession and changes in consumer behaviour.

Considering the above, there is an increasingly pressing need to adapt and provide local facilities in convenient locations in towns like Blessington if convenience retail is to avoid a significant loss of in-store shopping, and associated consequences to settlement public realm dynamics.

The Planning Authority should therefore actively encourage the provision of 'bricks and mortar' retail infrastructure to the greatest extent possible, to preserve and enhance the vitality and viability of the town centre.

3.3 Town Centre Footprint

The subject site is primarily proposed to be zoned Town Centre, with the exception of the existing residence and a small area of mixed use lands to the rear. The additional area sought to be zoned town centre measures c. 0.4 hectares.

We note the dLAP includes the omission of Town Centre lands elsewhere in the town, e.g. the former *OP3: Lands adjoining the Naas Road opposite Rockypool Villas* and lands to the north of the existing Dunnes Stores site, each of which are to be zoned for alternative uses, reducing the town centre footprint.

In addition, we note the Town Centre zoning extends further north (by c. 120 metres) opposite the subject site, up to and including Blessington Tyre Centre.

The exclusion of part of the subject site leads to an imbalance in this regard, in terms of creating a definitive gateway / approach to the town centre.

Given that Haylands House has been acquired and assembled within the overall subject lands, the town centre zoning should be extended to reflect the subject lands potential and to encourage the redevelopment of the Haylands House element.

The existing residence on the site represents a low intensity form of development, and does not contribute to the creation of streetscape or character on this important gateway to the town centre.

Preservation of the existing character should therefore not be encouraged by the Plan, which the current *RE: Existing Residential* objective on the one hand implies, and on the other hand is unclear, insofar as the proposed *Opportunity Site no. 8* as currently drafted indicates that the lands should be redeveloped.

¹ <https://www.checkout.ie/retail/dunnes-retains-highest-market-share-among-irish-grocery-retailers-208834>

Site specific considerations in terms of the appropriate layout and form of any redevelopment would be appropriately progressed under a subsequent planning application.

In order for such an application to be appropriately accommodated, the Town Centre zoning should in our opinion be extended to include all of the subject lands.

3.4 Opportunity Site Extent

As noted above, the proposed *Opportunity Site no. 8* extent is considered to be too large and including too many disparate parcels to form an effective vehicle to progress the redevelopment of the overall site. The assembly of all of the current extents into a single Opportunity Site is typically not something that can be realistically mirrored in terms of actual site assembly.

The subject lands are the assembly of two parcels, in and of itself a significant challenge, whereas the further assembly of a further five parcels (totalling seven parcels), is not considered to be reasonably likely to achieve, particularly in the lifetime of the Plan.

As such, presenting *Opportunity Site no. 8* as a heavily integrated development concept, that lacks any particular modular or phased approach, and includes significant ancillary / infrastructure elements in respect of the northern area, will likely stymie the realisation of the underlying goal of regeneration in the town centre.

We therefore request that *Opportunity Site no. 8* be divided into two (complementary) parts, with the subject lands forming an Opportunity Site in their own right.

3.4 Current dLAP Opportunity Site Guidance / Objectives

We note the dLAP states as follows at present in relation to *Opportunity Site no. 8*:

BLESS OP8 North Blessington Main Street

This site is comprised of a combination of 20th century suburban dwellings with outbuildings surrounding the Maxol service station on Blessington Main Street/N81 and older vernacular dwellings to the northern end, with commercial activity ongoing to the rear of some dwellings. Were commercial activity to cease or relocate, this would be a significant area of town centre land that could allow for redevelopment opportunities. The primary focus of redevelopment in this opportunity site should be to form high intensity residential and mixed use development to improve the activity and visual appearance of the area, and to provide for pedestrian and cyclist permeability through the site to connect to any potential redevelopment of Doran's Pit.

Objectives BLESS OP8

- To provide for mixed use town centre infill development (which shall include residential use). Indicative block formats are provided in the below concept plan. Development should provide an appropriate architectural response to the Blessington Architectural Conservation Area, which is located a short distance to the south of the opportunity site.*
- The redevelopment of this site shall provide pedestrian and cyclists routes (with two-way segregated cycle lanes) through the site to connect Blessington Main Street to any potential redevelopment of Doran's Pit.*
- Redevelopment of this site should seek to retain vernacular buildings that are present and have regard to their massing, while new buildings along the western boundary should also providing strong urban and active frontages to Blessington Main Street.*

Difficulties anticipated as a result of the above include:

- Overall unit / site is too large, tying too many parcels into a joint fate, where incremental / modular development is prevented or frustrated;
- Highly aspirational in nature ("*were commercial activity to cease or relocate*") rather than a deliberate, proactive or meaningful objective of the Plan;
- The potential for redevelopment is only as strong as the 'weakest link' in terms of feasibility, viability and availability;
- Primary focus (high intensity residential and mixed use development) contrary to the underlying Town Centre zoning objective, where Town Centre uses should be the primary focus, whilst allowing for ancillary elements including residential;
- Pedestrian and cyclist permeability to Doran's Pit a worthwhile objective however on a practical level would appear only feasible to southern portion, due to topography changes to north;
- Appropriate architectural response to the Blessington Architectural Conservation Area also worthwhile, once balanced with overall town centre objectives;
- Balancing massing of vernacular buildings whilst also providing strong urban and active frontages will also require flexibility and interpretation; and,
- There is no real North-South desire line, with the existing Main Street providing this axis, hence the inclusion of a North-South within the block further fragments potential development blocks.

3.5 Proposed Opportunity Site Guidance / Objectives

In the first instance it is proposed to split Opportunity Site no. 8 into two elements, not dissimilar to the clustered arrangement of site nos. 1-3 and 4-6.

Opportunity Site no. 8 should therefore become Opportunity Site nos. 8 & 9, as follows:

- *Opportunity Site no. 8 East of Main Street (North)*, the subject lands; and,
- *Opportunity Site no. 9 East of Main Street (South)*, the adjoining lands to the south of the subject lands.

Specific objectives for the subject lands should include, for example:

BLESS OP8 East of Main Street (North)

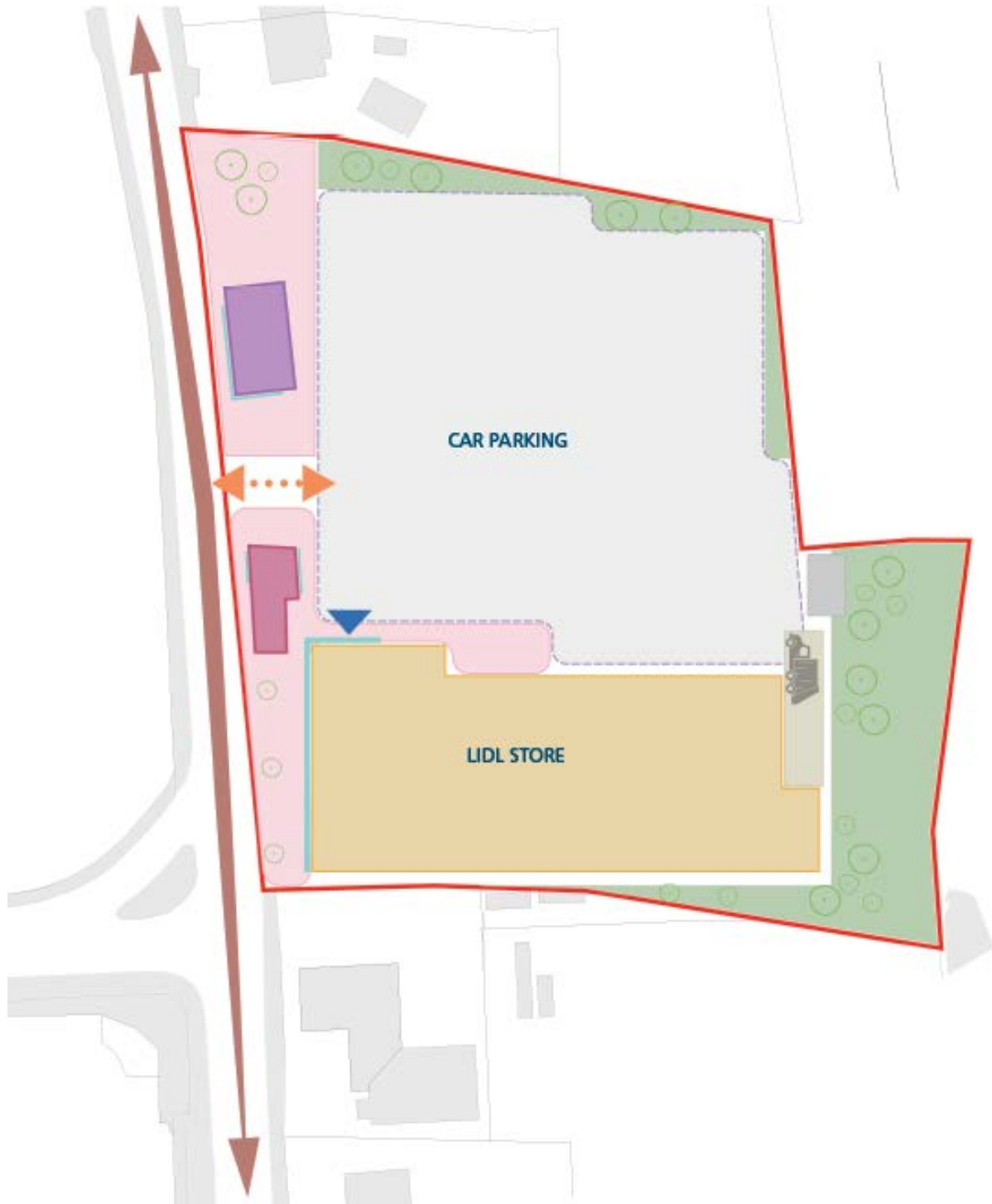
This site is comprised of a combination of a 20th century suburban dwelling with a commercial complex of outbuildings and older vernacular building north of the Maxol service station on Blessington Main Street / N81. The lands have been assembled in single ownership and are currently in vacant possession pending redevelopment proposals being brought forward.

The primary focus of redevelopment for this opportunity site should be to provide town centre activities, specifically retail (with associated ancillary elements where feasible), to improve the activity and visual appearance of the area, and contribute to Blessington town centre fulfilling its strategic role and function as an important service centre in the region.

Objectives BLESS OP8 East of Main Street (North)

- *To provide for town centre infill development. Indicative block formats are provided in the below concept plan including potential for a Foodstore Supermarket floor plate.*
- *Redevelopment of this site should have a degree of regard to vernacular features that are present and consider an element of incorporation or interpretation in any proposed scheme.*
- *New buildings along the western boundary should also providing strong urban and active frontages to Blessington Main Street.*
- *Redevelopment of this site should consolidate the multiplicity of existing access points to Main Street and have regard to the Blessington Main Street N81 Road Safety Improvement Scheme.*

Figure 4: Proposed Opportunity Site Concept Plan (Outlined in Red – Boundaries Approx.)



Legend

- Proposed Lidl Store
- Proposed Retail Units
- Proposed Car Parking
- Public Realm

- Proposed Landscape
- Main Vehicular Road
- Vehicular Access to Lidl Site
- Lidl Store Entrance

Source: Darmody Architecture

3.6 Clarification of Role of Other Opportunity Site Guidance / Objectives

We note that the dLAP also includes Opportunity Site nos. 1-7 around the town centre, which vary in size and context. The majority of the sites are in our opinion aspirational and complicated in nature (e.g. in particular nos. 2, 3, 4, 5, 7), reliant on a significant number of interventions in terms of assembly and otherwise, and ultimately likely requiring significant development scale and corresponding investment.

Lidl Ireland GmbH (as a food retailer) is not in a position to take on the role of large scale property developer (which is not their function) as would be required to deliver same. In the absence of any means of delivery of a store on such sites, these locations are neither suitable, viable or available.

The remaining site nos. 1 & 6 would appear to have a slightly less complicated context, notwithstanding many challenges remaining thereon, in particular in relation to the former and the issue of displacement of existing car parking usage, likely to be heavily resisted locally, notwithstanding urban realm aspirations of the dLAP.

We also reiterate that Lidl have been seeking to secure lands in Blessington, in particular in the town centre, for over twenty years to date.

We also paraphrase the dLAP which emphasises that the continual evolution of towns is essential for their survival. As noted above, the evolution of food shopping in Blessington has been relatively stagnant for a number of Development Plan cycles. In this context, the subject lands are the only (a) suitable (b) available and (c) viable location emerging.

The *Retail Planning Guidelines 2012* set out policy on page 29 to 33 in this regard in relation to the location of retail development and the use of the Sequential Approach test, including the key elements of:

- **Suitability** – Matters to be considered include whether or not the development is consistent with development plan objectives, in particular zoning objectives, current land use activity in the vicinity of the site, size, capacity to accommodate development, traffic and transportation issues; and/or,
- **Availability** – This criterion relates to site ownership, ease of assembly and timing. Sites must be genuinely available for development at the time that site acquisition/assembly begins or within a reasonable time-frame; and/or,
- **Viability** – The financial viability of a development is also a key consideration. The cost of site acquisition in the town centre may render a proposal unviable and force a developer to look elsewhere in the area. Excessive development costs relative to values are also a consideration. For example, the requirement to deal with remediation for a brownfield site may have the potential to make a proposal unviable.

This issue (of sequential preference) is particularly pertinent in the context of the below issue of overlapping core retail area and town centre designations.

3.7 Town Centre & Retailing Policies

As noted above, the emphasis in relation to a number of town centre and retailing policies is in our opinion unduly weighted towards the core retail area rather than the town centre as a whole, potentially supplanting the function of the Town Centre zone (as discussed in Sections 2.1 & 2.2 above). We also note that the Core Retail Area is particularly small in size, and heavily developed and occupied, such that its capacity to absorb additional development should not be overestimated.

As such, choices will be required as to what to prioritise, as the absence of prioritisation would lead to significant opportunity cost, e.g. encouraging lower order functions in lieu of higher order functions, where the latter are more commensurate to the scale and function of the core retail area and Blessington itself.

As such, we propose limited but important amendments to certain objectives, as follows:

BLESS₄ To direct retail development into the town centre, following the sequential approach, and having regard to its role and function as set out in the Wicklow County Development Plan 2022-2028 (or any update thereof), in line with its position in the County Retail Hierarchy & Strategy. This will be accomplished as follows:

- *The Core Retail Area will be prioritised for high order comparison retail, specialist / niche & small-scale convenience, experiential / leisure retail, non-retail services and associated activities.*
- *There will be no quantitative restriction on the development of retail floorspace within the Blessington Town Centre.*
- *All developments for additional retail floorspace, which are outside the Town Centre (as zoned for such purposes), will be required to be accompanied by a Retail Impact Assessment in line with 'Guidelines for Planning Authorities – Retail Planning' 2012 and any updated or relevant guidelines.*
- *The development of retail floorspace outside of Blessington Town Centre (as zoned for such purposes) will not be facilitated unless absolutely necessary.*

4.0 CONCLUSION & SUMMARY OUTCOME SOUGHT

In summary, our client seeks that the LAP acknowledge the significant potential and strategic opportunity provided by the subject lands, being a relatively large site in single ownership at a gateway location.

The subject lands also have the distinction of being available and assembled, by a landowner with a significant track record of delivery being in a position to proceed with a development scheme in the short term. In short, our client requests three alterations to the dLAP, as follows:

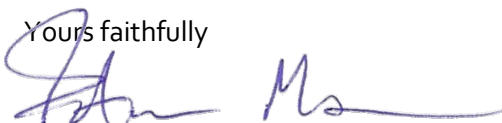
1. That the Town Centre zoning be extended slightly to the North and East, to include the full landholding (more closely following the town centre pattern on the opposite side of the road) – this relates to both the Blessington LAP & Variation No.3;
2. That the 'Opportunity Site' designation for the subject lands be amended to a) reflect an extended Town Centre zone; and, b) be split in two to facilitate staged development of the overall Haylands landbank, rather than inadvertently tying a large landbank to a singular phase of regeneration; and,
3. That town centre and retailing policies (in particular but not limited to Objective *BLESS₄*) be more closely aligned with high level retail policies, including those of the Retail Planning Guidelines, directing activity to the town centre as a whole (as elaborated on above).

The preceding commentary sets out a robust rationale for these amendments, which we submit are minor in nature in the overall context of the ambitions of the Plan, and rather than deviate from the underlying objectives therein, will render those objectives implementable in the short term.

Proactively encouraging the implementation of these stated objectives

I trust the above is of interest and should you have any queries or wish to discuss further please do not hesitate to contact me.

Yours faithfully



Fintan Morrin
Principal
The Planning Partnership