



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	Agent
Name:	Aldi Stores (Ireland) Limited
Email Address:	[REDACTED]
Reference:	GDKLAP-100915
Submission Made	January 31, 2024 10:11 AM

Topic

Economic Opportunity - Tourism - Shops & Services - Community Facilities

Submission

Please see submission enclosed.

File

Pre-Draft Submission Greystones_ Delgany_ Kilcoole LAP 2024-2030.pdf, 0.32MB

'Greystones-Delgany & Kilcoole LAP",
Administrative Officer,
Planning Department,
Wicklow County Council,
County Buildings,
Station Road,
Wicklow Town,
A67 FW96

31st January 2024
JSA Ref: 24011/IL

Dear Sir/Madam,

RE: SUBMISSION ON THE PRE-DRAFT CONSULTATION FOR THE GREYSTONES-DELGANY & KILCOOLE LOCAL AREA PLAN 2024-2030 ON BEHALF OF ALDI STORES (IRELAND) LIMITED.

1.0 Introduction

- 1.1 On behalf of our client, Aldi Stores (Ireland) Ltd., Newbridge Road, Naas, Co. Kildare we wish to make a submission on the pre-draft consultation stage for the Greystones-Delgany & Kilcoole Local Area Plan 2024-2030.
- 1.2 We welcome the opportunity to make a submission at this stage of the LAP process and look forward to working with the Planning Authority to ensure that convenience retail provision and choice is provided to the local community and County Wicklow.
- 1.3 In making this submission, due regard has been had to the pre-draft Issues Paper prepared by Wicklow County Council in relation to the preparation of the forthcoming 2024 – 2030 Greystones-Delgany & Kilcoole Local Area Plan.
- 1.4 The purpose of this submission is to respectfully request that the appropriate planning policy framework is provided in the forthcoming 2024 – 2030 Greystones-Delgany & Kilcoole Local Area Plan to facilitate Aldi in achieving its objective of developing an additional discount food store to serve the Local Area Plan area.
- 1.5 Aldi currently have over 160 stores in Ireland, including a store at Mill Road, Killincarrig in the southern part of Greystones with a number of other stores either under construction or at planning stage. Aldi seek provision within the LAP to accommodate an additional Aldi store to meet identified need, having regard to the strong trading environment experienced in the area at the current store. It is considered that given the recent increase in population of the area in the 6 year period to 2022, the LAP lands can accommodate an additional discount food store to expand the variety and choice for local residents and increase competition in the local area.

Managing Director: John P. Spain
Executive Directors: Paul Turley | Rory Kunz | Stephen Blair | Blaine Cregan | Luke Wymer

Senior Associate Directors: Meadhbh Nolan | Kate Kerrigan
Associate Directors: Ian Livingstone | Tiarna Devlin

John Spain Associates Ltd. trading as John Spain Associates.
VAT No. IE 6416306U

2.0 Economic Opportunity – Tourism - Shops & Services - Community Facilities

2.1 Aldi notes the above section of the pre-draft consultation paper and in particular, the following questions on this topic:

> What can be done to increase the amount of jobs within the settlement?

> Are there deficiencies in the existing retail provision within Greystones-Delgany and Kilcoole?

2.2 Aldi considers that owing to the significant population growth observed in the LAP area in the period to 2022, a commensurate increase in convenience retail development will be required to meet the growing demand and available expenditure in the area. The review of the current LAP and the preparation of the 2024-2030 Local Area Plan provides an opportunity to pro-actively plan for the provision of an additional discount food store in the area. This will also support local job creation, increasing the ratio of jobs to resident workers in the area which is currently low at 0.32 jobs to resident worker.

2.3 It is noted that current Core Strategy figures and population targets set out for Greystones-Delgany and Kilcoole in the extant Wicklow County Development Plan 2022-2028 have already been surpassed as set out in the National Planning Framework and the Regional Spatial & Economic Strategy for the Eastern & Midland Region.

2.4 The Local Economic & Community Place Plan 2016-2022 identified “*high levels of retail leakage*” in the county and aims to “*assist in increasing retail conditions throughout the County*” with the objective to “*enhance the attractiveness of town centres and retail premises across the County*”. In this respect, retail provision within the LAP area can be improved in order to prevent and reverse leakage, as well as increasing the number of jobs in the settlement, making the area more sustainable, contributing to a higher jobs to working population ratio and reducing the need for commuting and reliance on the private car.

2.5 Aldi consider that owing to strong trading environment in the Greystones / Killincarrig store as well as the absence of new convenience retail provision in the area over the previously intercensal period and CDP period, an opportunity exists for provision for a new medium sized discount food store in the LAP area.

Wicklow County Development Plan Core Strategy & Population

2.6 The Core Strategy of the current Wicklow CDP 2022-2028 is a key consideration in the projected growth of the LAP area over the period to 2030. The pre-consultation document for the Greystones-Delgany & Kilcoole LAP notes that the area “*will need approximately 850 new homes between now and 2031*” however “*it is estimated that growth in these settlements will exceed this target before the end of the plan period due to legacy housing developments under construction*”. The target of 850 new homes has been derived from the Wicklow CDP Core Strategy for Greystones-Delgany and Kilcoole, with the development plan basing these targets on population growth projections set out in the NPF.

2.7 Greystones-Delgany is identified as a Level 3 ‘Self-Sustaining Growth Town’ in the Wicklow Settlement Hierarchy “*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". Level 3 towns are "targeted for growth rates of 25%-30%, with slight variations based on capacity / past trends" as set out in the Core Strategy of the Wicklow CDP 2022-2028.

- 2.8 Kilcoole a Level 4 'Self-Sustaining Town' in the hierarchy *"with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining". Level 4 towns "are generally targeted for growth rates around 20%-25%".*
- 2.9 In the case of both towns, population growth is predicted to exceed targets before the end of the Plan period, highlighting the strong population growth in recent years. Table 3.4 of the Core Strategy identifies a population target of 21,727 for Greystones-Delgany by Q2 2028, an increase of 3,707 on the Census 2016 population. Kilcoole is set a population target of 4,778 in Q2 2028, an increase of 534 from the settlement's 2016 population. This are demonstrated below.

Table 3.4 Wicklow Settlement / Aggregate Settlement Population Targets 2016, Q2 2028

Level	Settlement	Population 2016	Population target Q2 2028
1	Bray	29,646	38,565
2	Wicklow - Rathnew	14,114	18,515
3	Arklow	13,226	15,419
	Greystones - Delgany	18,021	21,727
	Blessington	5,234	6,145
4	Baltinglass	2,251	2,607
	Enniskerry	1,877	2,106
	Kilcoole	4,244	4,778
	Newtownmountkennedy	3,552	5,179
	Rathdrum	1,716	2,339

- 2.10 This is required to be considered alongside the results of the CSO Census 2022 to fully understand the scale of population growth in the area since 2016. In terms of Greystones-Delgany, the 2022 Census confirmed a total population of 22,009, an increase of 3,988 or 22% on the 2016 Census population figure for the settlement and considerably in excess of the 9% growth rate of County Wicklow as a whole. This strong growth has already surpassed (by almost 300) the population target of 21,727 for the town as set out in Table 3.4 of the Wicklow CDP Core Strategy.
- 2.11 In respect of Kilcoole, the 2022 Census recorded a population of 4,582, an increase of 134 since 2016 and broadly aligned with the target set out in the Core Strategy.
- 2.12 The increased population in the intercensal period to 2022 notes significant growth in Greystones-Delgany, with an increased population outstripping the projected

targets for 2028 more than 6 years and a full plan period in advance. In this regard, it is logical in planning terms to make provision for additional convenience retail in the area to meet an identified need, address an expenditure surplus and to prevent leakage to other towns, as identified in the Local Economic & Community Place Plan 2016-2022.

- 2.13 The Appendices of the Greater Dublin Area Retail Strategy 2008-2016 suggest a per capita expenditure of c. €2,949 in the Wicklow area in 2026. This is considered to be a conservative figure having regard to current expenditure levels and inflation. Greystones-Delgany has experienced an increased population of 3,998 between 2016 and 2022, already exceeding the population target of 22,009 for the settlement as set out in the Wicklow CDP Core Strategy in the period to Q2 2028. This population is anticipated to grow further in the current Plan period, with the development plan acknowledging the contribution of legacy housing developments currently permitted and under construction in the area.
- 2.14 In this respect, based on a conservative figure of a 3,998 increase in population in Greystones-Delgany would result in additional available expenditure per capita of at least c. €12 million in the area in the previously Plan period to 2022, with continued strong population growth since 2022 consolidating this potential expenditure further.
- 2.15 It is noted that no significant additional convenience retail has been permitted in the LAP area since 2016, with Aldi experiencing strong trading conditions at their current store at Killincarrig. It is therefore vital that the forthcoming LAP makes provision for new convenience retail at an appropriate size to utilise the existing additional per capita available in the area arising from a 22% increase in local population in the intercensal period.
- 2.16 This will also assist in creating additional employment opportunities and stemming the flow of expenditure to other counties, noted as a perennial problem for County Wicklow.

Retail Hierarchy & Strategy

- 2.17 The Retail Hierarchy & Strategy set out in Chapter 10 of the Wicklow CDP 2022-2028 consolidates the findings of the Local Economic & Community Place Plan 2016-2022, stating that Wicklow *“is still a net exporter of retail expenditure and it will continue to be the policy of the Planning Authority to address this and reduce leakage to other counties”*. Chapter 10 proceeds to state that it is *“essential that new retail development should be facilitated and encouraged in town centres”* and *“improve the quality of its retail offer to maintain share and competitiveness and to ensure that good quality retail is provided in locations that are local, accessible by foot and/or can be served by public transport”*.
- 2.18 Table 10.1 sets out the Retail Hierarchy & Strategy for County Wicklow, confirming Greystones as a Level 3 Town and notes that *“Supermarkets and smaller scale department stores are required to meet local needs”* in these locations.
- 2.19 Aldi are supportive of the provision of the County Development Retail Strategy which identifies the need for enhanced convenience retail provision in Greystones in order to meet local needs and the opportunity for retail and considers that the northern part of the settlement is appropriate to accommodate additional convenience retail to enhance existing provision and competition.

- 2.20 It is noted that there have been no significant permissions for new convenience retail in Greystones-Delgany over the previous Plan period to 2022, highlighting the need for additional provision in the area in response to the significant population growth in excess of the 2028 target for the settlement.
- 2.21 This should be considered in the context of the Wicklow Retail Strategy in the extant CDP which notes that c. 4,500 sqm of new retail floor space was granted in the 4 year period to November 2020. However, the Greystones-Delgany area accounted for only a small portion of this figure, with the existing Lidl store at Blacklion permitted for demolition and rebuild, providing a net increase in retail floor space of c. 400 sqm. A review of the Wicklow County Council online planning search indicates that a number of planning permissions have been granted for change of use of existing retail to an alternative use at various locations in the LAP area. This highlights further the requirement for existing convenience retail to be consolidated and expanded for the benefit of the local community and catchment.
- 2.22 In this regard it is respectfully requested that the forthcoming LAP utilises the opportunity to provide the planning framework to accommodate additional convenience retail in the area.

Settlement Strategy & Extant LAP Zoning

- 2.23 The Settlement Strategy of the Wicklow CDP 2022-2028 states the following in terms of retail and employment in Greystones:

“The town aims to attract a concentration of major employment generating investment and should target investment from foreign and local sources in a mixture of ‘people’ and ‘product’ intensive industries. In addition, the town should provide for the retail needs of its population and its catchment, in the form of a mixture of both comparison and convenience retail offer.”

- 2.24 In respect of potential opportunities in the settlement the Settlement Strategy notes:

“The key regeneration / infill opportunity in Greystones - Delgany targeted to be realised within the lifetime of this plan is the redevelopment of Council owned land at South Beach (adjoining the Council local offices and depot), which is currently occupied by low intensity uses, such as surface car parking. The development of these lands for a range of uses, for the benefit of the community, including government services, employment, retail, community, recreation and residential use, forming a link between the historic town centre and the strategic employment lands shall be activity pursued by the Council.”

- 2.25 While this commentary is acknowledged, it is likely that any such retail development at South Beach would be small scale in nature and make up a wider mix of uses at the location which would not be capable of facilitating a medium sized supermarket sought by our client.

- 2.26 Owing to lack of availability of appropriately sized Town Centre zoned lands in the current LAP area which would be capable of accommodating an Aldi store, larger, appropriately located sites, such as in the northern part of Greystones, should make provision for suitably scaled convenience retail to ensure the increased demand in the area is sufficiently met and further expenditure leakage from the area is prevented.

- 2.27 This provides an opportunity for forthcoming LAP to include a planning framework an appropriately scaled food store to address the deficiency in provision in the LAP area currently. The recent expansion of the existing Lidl development at Blacklion demonstrates the demand and requirement for additional convenience retail in Greystones and highlights the appropriateness of the northern part of the town for such development owing to its accessibility and proximity to existing and under construction residential development.
- 2.28 In this respect, there may be further opportunities for expanded convenience retail provision particularly along Victoria Road in the northern part of the town such as at the former Ormonde cinema site and adjacent lands, for example.
- 2.29 The addition of an Aldi store in this location will add to competition in accordance with the Retail Planning Guidelines 2012 and improve variety and choice for local residents, contributing to sustainable mixed communities.

3.0 Summary & Recommendation

- 3.1 Aldi Stores (Ireland) Limited respectfully submits in response to the topics above that a deficiency currently exists in retail provision in the LAP area, and particularly in Greystones. This is considered in the context of the significant increase in population of the LAP area and Greystones-Delgany in Census 2022 data, noting a 3,998 (22%) growth between 2016 and 2022, contributing to a population total of 22,009 in the settlement.
- 3.2 As described above, this has already exceeded the Population Target of 21,727 for Greystones-Delgany up to Q2 2028, more than 6 years in advance of this date. This highlights the strong growth in the area which is anticipated to continue in the current Plan period, with the Core Strategy of the Wicklow CDP acknowledging that the resident population of the LAP will exceed the targets set out to Q2 2028 having regard to the completion of legacy housing permissions in the area.
- 3.3 In this regard, the figures set out in the Core Strategy, based on the 2016 Census and population projections in the National Planning Framework, are significantly outdated and require variation to align with the current situation as demonstrated by the Census 2022 results.
- 3.4 The increase in population in the area requires a commensurate growth in the provision of convenience retail to meet demand, utilise the additional c. €11 million in available expenditure in the area and assist in reversing leakage to other counties. Aldi currently trade from an existing store at Killincarrig and have experienced a strong trading environment and high levels of demand in recent years, reflective of the population increase and need for additional retail floor space in the area.
- 3.5 With the exception of small retail units and modest expansions of current convenience retailers, there have been no significant increase in the retail floor space in the area since 2016.
- 3.6 In this regard, there is a clearly a need for additional convenience retail provision in the area which can be included in the planning framework, policies and objectives of the forthcoming LAP 2024-2030.

- 3.7 In accordance with the Retail Planning Guidelines 2012 and the Wicklow CDP 2022-2028 Retail Strategy, Aldi's preferred location for new stores is within the town centre. However, Aldi have been searching for appropriate sites in the LAP for a number of years to no avail, with site constraints, primarily in relation to size, preventing progress in this respect. A review of 'TC' zoned lands in Greystones indicates an absence of appropriately scaled sites which would be capable of accommodating a medium sized Aldi store with a net retail floor area of c. 1,300 sqm. This is due to the tight urban grain in the town centre, proximity to adjoining properties and constrained access to backland sites.
- 3.8 In this regard, Aldi are supportive of the inclusion of appropriately zoned lands in the northern part of Greystones to accommodate a medium-sized supermarket to enhance retail provision and competition in the area.
- 3.9 Therefore, the following recommendations are set out for inclusion in the draft Greystones-Delgany & Kilcoole LAP 2024-2030:
- **Inclusion of appropriately zoned 'neighbourhood centre' lands to make provision for a medium-sized supermarket with a net retail floor space of up to 1,500 sqm in the Blacklion / north Greystones area.**
- 3.10 It is respectfully requested that it is incumbent on the Planning Authority to make provision specifically for an expanded convenience retail offer in the town to address the current deficiency in accordance with the Retail Strategy of the Wicklow CDP which states that it is "*Supermarkets and smaller scale department stores are required to meet local needs*" in Level 3 towns such as Greystones-Delgany.

4.0 Conclusion

- 4.1 The forthcoming Greystones, Delgany/Kilcoole Local Area Plan 2024 – 2030 will guide future development in the LAP area for a six year period from its adoption. Aldi are actively seeking a suitable site within the Greystones area of the Local Area Plan and it is respectfully submitted that the forthcoming LAP should identify suitable sites for such a development.
- 4.2 A proactive plan-led approach to the delivery of retail development accords with the recommendations of the Retail Planning Guidelines which also put an increased focus on increasing competition in the retail sector. In this regard, it is respectfully requested that the LAP includes appropriately zoned lands, policies and objectives which align with the Retail Strategy of the Wicklow CDP 2022-2028 to accommodate new supermarket development in Greystones.
- 4.3 It is clear that the rapid increase in population in the LAP area in the period to 2022 far exceeds the projections of the NPF and set out in the Wicklow CDP Core Strategy. Accordingly, additional retail provision is required in the area to meet increasing demand, utilise available expenditure and assist in preventing leakage to surrounding counties.
- 4.4 We would be grateful if the above submission is taken into consideration in the preparation of the draft LAP and look forward to its issue in due course.

Yours faithfully,

A handwritten signature in black ink that reads "John Spain Assoc." in a cursive style.

John Spain

Managing Director John Spain Associates Ltd.