



Greystones-Delgany & Kilcoole Local Area Plan Submission - Report

Who are you:	Agent
Name:	Lidl Ireland GmbH
Email Address:	[REDACTED]
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Topic

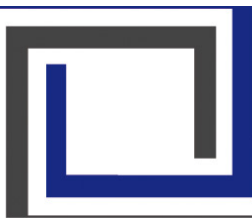
Economic Opportunity - Tourism - Shops & Services - Community Facilities

Submission

See attached

File

Lidl Kilcoole Pre-Draft Submission.pdf, 0.74MB



Greystones-Delgany & Kilcoole LAP

Administrative Officer
Planning Department
Wicklow County Council
County Buildings
Wicklow Town
A67 FW96

Wednesday, 31st January 2024

[Via [Greystones Delgany Kilcoole Portal \(arcgis.com\)](https://arcgis.com)]

Dear Sir/Madam,

RE: SUBMISSION TO THE GREYSTONES-DELGANY & KILCOOLE LAP LOCAL AREA PLAN ON BEHALF OF LIDL IRELAND GMBH

1.0 INTRODUCTION & SUMMARY

The Planning Partnership, Upper Chapel Street, Castlebar, Co. Mayo have been retained by Lidl Ireland GmbH, Lidl Regional Distribution Centre, Littleconnell, Newbridge, Co. Kildare, W12 KT98, to make this submission to the forthcoming *Greystones-Delgany & Kilcoole LAP* in respect of their store strategy for Kilcoole, and in relation to Retail Planning issues affecting the town in general.

Lidl are currently actively pursuing the development of a store at Main Street (as previously sought under *Reg. Ref: 23/3*). A subsequent planning application is intended to be lodged in the short term. Our client requests that the final Local Area Plan (LAP) adequately reflect the important role of Kilcoole Town Centre, the benefit potential for the town that would be provided by Lidl (or other) foodstores in the town, and that retail and related policies are suitably supportive of same.

Our client requests that the zoning / designation of the lands in question be re-confirmed as *Town Centre* in nature, affirming the suitability of the site for Foodstore / Supermarket type development. For the avoidance of doubt, we note the 'pre-draft' restriction on consideration of requests for the zoning of land does not apply to Local Area Plan process, rather relates to the Development Plan process which is governed by separate legislative provisions. Accordingly, there is no restriction on consideration of zoning requests.

Independent of the issue of site zoning, it is also important that any retail strategy / hierarchy adequately designate the settlement of Kilcoole, with no restrictions on scale that could impede the provision / continuation of Foodstore / Supermarket type development thereon.

As such, the primary objective of this submission is to emphasise the need for the forthcoming LAP to avoid any restrictions or outdated assumptions regarding retail use and scale that could prejudice the strategic objectives of providing local shopping opportunities for residents of the town.

The LAP should encourage proportionate retail provision, to enable the town centre of Kilcoole to fulfil its function and potential. At present, there is potential for conflicting objectives of the County Development Plan (CDP) to act as an obstacle to appropriate development in the town.

The forthcoming LAP is an important step in resolving same, and can provide an appropriate local elaboration of retailing / town centre policies, underpinned by the strategic principles of the CDP.

2.0 RETAIL PRINCIPLES

2.1 The Role of Discount Foodstores

The retail market has altered considerably in recent years, and Discount Foodstores have played a part in same. For instance, the previous domination of the sector by the three largest operators (Dunnes Stores, Super Valu and Tesco) has lessened somewhat which we consider is a positive in terms of consumer choice and competition.

Discount Foodstores have brought significant value to the convenience retail market with other larger operators subsequently responding to varying degrees in terms of price cuts, etc.

Today, Lidl is one of the fastest growing retailers in Europe, trading in more than 20 countries and operating in excess of 9,500 stores. Lidl has a continued expansion Plan to open and operate further stores across Ireland and to bring cost competitiveness to an increasing number of areas.

Discount Foodstores have delivered increased competitiveness in the retail sector and continue to deliver accessible convenience shopping to neighbourhoods and smaller towns which were previously devoid of appropriate convenience shopping opportunities and/or competition and choice.

This positive contribution to the vitality and viability of smaller population centres should be acknowledged, reducing the need to travel to mainstream supermarket chains, 'defending' these population centres from larger retail centres and reducing leakage to same, resulting in more sustainable travel patterns by bringing the retail offer and cost benefits closer to the resident population.

The limited size of Discount Foodstores (being a small to medium scale supermarket), as well as the limited range of goods stocked results in this format being deliverable at multiple levels of the retail hierarchy – from local / neighbourhood to town centre locations.

Whilst the Planning Authority will be aware of Lidl's operations in Wicklow and elsewhere, it is important to clarify and explain the specific role and concept behind the Discount Foodstore model.

Lidl's Retail offer is currently referred to as a Discount Foodstore and is recognised as being a distinct retail offer rather than merely a 'normal' or 'standard' convenience retail outlet. Discount Foodstores primarily sell convenience goods (convenience goods being defined in the *Retail Planning Guidelines* (2012) as being "Food; Alcoholic and non-alcoholic beverages; Tobacco; and, Non-durable household goods.") however the retail offer is different to other convenience retailers.

The distinction between 'discount stores' and other convenience goods stores which was contained in the *Retail Planning Guidelines* (2005) no longer apply in the *Retail Planning Guidelines* (2012).

The Guidelines however retain fluidity to the concept of new forms of retailing and changes as they emerge¹ whilst Annex 1 of the *Retail Planning Guidelines* (2012) acknowledge that retailing is dynamic and that it should be noted that new forms of retailing may evolve which are inadequately described by current terminology, and should be assessed on their merits.

The Guidelines describes the term 'Supermarket' as a single level, self-service store selling mainly food, with a net retail floorspace of less than 2,500 sq m².

Regardless of the *Retail Planning Guidelines'* homogenisation of Discount Foodstores and 'mainstream' supermarkets there are inherent sub-sectors within the overall 'convenience' category, as evidenced by the considerable expansion of 'discounters' relative to 'mainstream' supermarkets in recent years and the distinguishable retail patterns of discounters vs. mainstream stores.

¹ Page 52, Annex 1 of the *Retail Planning Guidelines* (2012)

² Page 53, Annex 1 of the *Retail Planning Guidelines* (2012)

Discount Foodstores retain their distinctiveness and competitiveness. Discount Foodstores in particular provide an important role providing access to the basic food requirements of the local population at the minimum price, thereby assisting in reducing or preventing 'food poverty'³ and accordingly having a relevance to social as well as retail or economic policies and objectives.

The issue of competition and choice is in our opinion a central pillar of national retail planning policy and we trust that Wicklow County Council will give the requisite weighting to the issue accordingly. For instance, the National Consumer Agency *Price Comparison Survey, July 2009* highlights that Discount Foodstores are significantly cheaper with respect to the goods on sale compared to the 'traditional' supermarkets. The results of the survey with regard to own-brand products of all stores are described as follows:

"In this case, Aldi, Lidl, Dunnes Stores and the two Tesco and SuperValu stores are compared across a basket of 20 items. The difference between cheapest and dearest is €8.99 (45%) with Lidl being the cheapest (€19.83) although the price for the basket in Aldi is virtually identical (€19.87). In this comparison the SuperValu stores are the most expensive (€28.82).

The gap has widened significantly since the January 2009 survey when the difference between cheapest and dearest was €8.53 (35%). At that time Lidl was the cheapest (€24.33) and SuperValu Dublin South the dearest (€32.86). Note that different SuperValu stores are chosen for each survey."

"Whilst the results of the survey are clearly good news for shoppers, it remains the case that the best value is to be found by astutely splitting the basket between the various retailers, informed by their relative competitiveness across the branded and own brand segments. NCA market research suggests that own brand products now account for circa one third of the typical shopping basket, suggesting that retailers will need to compete in all segments to attract value conscious shoppers."

We note the above research dates from 2009 however is considered to be still relevant particularly in terms of the principle of encouraging choice and competition.

The pattern of the evolution of Discount Foodstores in the Irish Market has also been analysed by the *Athlone Joint Retail Strategy 2019-2026* which, notwithstanding its applicability to a different functional area, is in our opinion noteworthy, wherein it states:

*"The discount convenience operators, namely Aldi and Lidl, have been gradually increasing their market share ... they have also: adopted a more creative, better designed approach to store formats; entered the High Street in a number of locations; and, begun to develop larger sized stores ... although **they are not seeking to evolve into much larger format stores. This is not their model, as well evidenced by their store development strategies in the UK where both entered the market some 20 – 25 years ago. The objective is increased market presence and penetration.***

***There is little evidence that the indigenous retailer, either here or in the UK, is seeking to enter the discount convenience market or being able to on a comparable / competitive basis. However, there has been a response to their entry into the Irish market with the main operators introducing their own branded discount lines, which has been positive for the consumer."** [Our Emphasis]*

³ Food poverty can be defined as *the inability to access a nutritionally adequate diet and the related impacts on health, culture and social participation*. Food poverty is not just about the consumption of too little food to meet basic nutritional requirements. It includes social and cultural contexts **where people cannot eat, shop for, provide or exchange food in the manner that is the acceptable norm in society**. Living in poverty and social disadvantage imposes constraints on food consumption in three main ways....Second, it impacts on access to food through the retail options available and the capacity to shop in terms of transport and physical ability.

Source: Combat Poverty Agency.

Therefore, whilst it is clear that the retail market in Ireland is evolving, as evidenced by the substantial expansion of Discount Foodstores, the particular characteristics of Discount Foodstores vs. larger 'mainstream' stores are still evident, albeit not as pronounced as previously.

In referring to the proposal as a Discount Foodstore, and acknowledging its position within the 'large convenience goods store' category of the *Retail Planning Guidelines*, we seek to distinguish it in terms of its smaller size, i.e. being a medium sized supermarket and not in the same realm as a large superstore or hyper store.

Figure 1: Lidl Since 2000 / Lidl 'Full Shop' Advert



Source: Lidl Ireland GmbH

2.2 Convenience Retailing Patterns

As is now well-recognised, the COVID-19 pandemic has demonstrated the critical role of the Foodstore (Corner Shop, Neighbourhood Shop, Discount Foodstore, Supermarket, Superstore, etc.) as a strategic service that is needed locally rather than on a 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, especially in rural and lower-level urban localities where distances to facilities are greater.

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.

COVID-19 has also demonstrated that Convenience shopping is highly exposed to change and a potential shift to online shopping platforms.

Where local access to physical stores is limited, this may well encourage and accelerate the transition to online shopping options. For instance, online food sales have increased from a pre-pandemic level of 2.7% to 6.3% of all sales in February 2021, more than doubling in a year, according to Kantar.⁴

We note ongoing trials of a supermarket delivery service via Drone in Oranmore. Co. Galway, with the operator of the service confirming that "... more than 35% of homes in the Oranmore delivery area use the service on a regular basis. The company's drones make an average 100 deliveries per day". They have also expanded to provide delivery services in Balbriggan, Co. Dublin.

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

Widespread adoption of these 'arms-length' shopping 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, we would submit that the need to adapt and provide local facilities in convenient locations in smaller urban settlements like Kilcoole is becoming more pressing if convenience retail is to avoid a significant loss of in-store shopping, and to reverse unsustainable journeys for in-store shopping, with all the associated consequences for the dynamics of rural towns and their environs.

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 retail centres across the county.

The avoidance of barriers to local services within planning policy and the LAP is a key step in this regard.

3.0 POLICY ISSUES

3.1 The Existing Local Area Plan

We note the current Local Area Plan (LAP) took effect in September 2013 for a period of six years and "... it is framed within the nine year period up to 2022. In addition, the plan has been prepared mindful of a long term background context of a further ten years or so beyond 2019, based on CSO long term projections."

We thus note the following extracts of the LAP in terms of the vision and key objectives for the town:

"Kilcoole is designated a Level 4 'Small Town', serving a local catchment with a range of shopping facilities, including one supermarket / 2 medium sized convenience stores (max 1,000m²) and a relatively large number of smaller shops (10-20 indicated in CDP). Generally not considered suitable for discount foodstores.

The identity of Kilcoole as a separate stand alone entity in the wider area shall be reinforced by protecting its distinct character and by encouraging its continued growth as a small, locally important commercial town. Kilcoole shall provide for the service and social infrastructure needs of its residents and its local hinterland.

⁴ <https://www.rte.ie/news/business/2021/0308/1201651-kantar-supermarket-figures/>

*Development of social infrastructure is to keep apace with population growth. **Kilcoole should aim to be an economically active town, which targets a variety of investment types, primarily local in nature**, in the form of 'product intensive' industries with some 'people' emphasis. In accordance with the Settlement Strategy, as set out in the Wicklow CDP 2010-2016, Kilcoole shall accommodate a moderate level of housing growth, from a current population of approximately 4,063 to a target population of 4,500 by 2016 and 5,000 by 2022.*

*Under the County Wicklow Retail Strategy, Kilcoole is designated a Level 4 Small Town Centre. **Small Town Centres provide for the retail and service needs of its population and local hinterland. Retail provision in Small Town Centres should be relatively extensive, including one supermarket/two medium sized convenience stores (up to 1,000m² aggregate) and perhaps 10-20 smaller shops and retail services.***

Land providing for the expansion of retail shops and services within Kilcoole is zoned TC within 'AP9: Bullford Action Plan' and south of the school/church.

*RT4: To provide for the development of a mix of uses within Kilcoole town centre, including retail, service and commercial outlets and leisure and community facilities, **to a degree that is akin to its designation as a Level 4 Small Town Centre status, so that the centre provides for the day-to-day needs of its population and its hinterland.***

*RT5: To promote the vitality and viability of Kilcoole's town centre and to promote retailing as the core function of the town centre. **Retail uses shall include a range of lower order comparison and supermarket retail formats.***

RT6: New town centre developments, in particular developments on the west side of Main Street, shall incorporate new 'streets' where possible, and developers of new town centre areas shall co-operate with each other in order to provide a new network of street and squares and to minimize duplication of car parks and vehicular access points on the Main Street." [Our Emphasis]

Whilst the thrust of the above remains relevant, a number of specific and practical issues arise, typically in terms of the passage of time and the evolution of retailing in the intervening decade.

Normal patterns and needs have shifted considerably in the interim, and a contemporary approach is required, not least in terms of the following:

1. The understanding / expectation from consumers as to what is a *small supermarket* has changed utterly in recent years. Customer requirements are far more sophisticated than has been the case in previous generations;
2. The LAP suggests that Kilcoole is *generally not considered suitable for discount foodstores*, which is also a wholly outdated position, not least to the evolution of the Retail Planning Guidelines as noted above – which emphasis that "*retailing is dynamic, it should be noted that new forms of retailing may evolve which are inadequately described by current terminology, and should be assessed on their merits.*"; and,
3. There is a disconnect between suggested floorspaces and the realisation of the qualitative objectives of the LAP, i.e. to fulfil the designated function of the settlement and the town centre. Over-reliance on 'guideline' quantum's is incompatible with achieving the practical objectives of the plan.

3.2 The County Development Plan and Role of Kilcoole

In terms of the strategic level we note Kilcoole is designated as a Self Sustaining Town (alongside and equal to Baltinglass, Enniskerry, Newtownmountkennedy and Rathdrum) at Level 4 in the settlement hierarchy (elevated from Level 5 under the previous Development Plan) of the County Development Plan (CDP), described *inter alia* as:

"It is important that the investment in social infrastructure in these towns is at a higher level, equivalent to larger size centres in recognition of their role as key centres for a very large rural hinterland and for surrounding smaller villages and towns.

Towns in Level 4 are generally targeted for growth rates around 20%-25%... The goal for these towns is to limit further development, other than for town centre / infill / regeneration. It is estimated that growth in Kilcoole will exceed this target range before the end of the plan period due to legacy housing developments under construction."

CPO 4.5 To ensure that all settlements, as far as is practicable, develop in a self sufficient manner with population growth occurring in tandem with physical and social infrastructure and economic development. Development should support a compact urban form and the integration of land use and transport.

CPO 4.9 To target the reversal of town and village centre decline through sustainable compact growth and targeted measures that address vacancy, dereliction and underutilised lands and deliver sustainable renewal and regeneration outcomes.

Resilient Town Centres - As the nature of retail evolves it will be necessary for some town and village centres to redefine and broaden their functions. The growth of online retail has undoubtedly impacted on towns and villages. Retailers can access new markets without the need for physical presence. This has undermined the traditional function of the 'Main Street'. It is no longer sustainable to rely on retail as the only use in town and village centres. As the nature of retail evolves it will be necessary for some town and village centres to redefine and broaden their functions.

*Town and Village Regeneration & Rejuvenation Priorities - Kilcoole
Strengthen and revitalise the town centre, address dereliction and repurpose underutilised properties. Revitalisation of the centre will strive to include the creation of a formal town square and new civic building to create a new focal point for the town with amenity and cultural focus, a public park, improved permeability within the town centre, new pedestrian and cycle links between the town centre and the train station, Kilcoole beach and Greystones.*

Level 4 Neighbourhood Centres, Local Centres – Small Towns"

The above demonstrates a significant *qualitative* role for the town in retail and commercial / town centre terms, which should be facilitated by corresponding retail / town centre policies and objectives in the forthcoming LAP.

Any conflicting or contradictory issues should be resolved as part of the LAP process, i.e. respecting the strategic objectives of the CDP but also allowing for their realisation in practical terms.

3.3 The County Development Plan Floorspace Guide

We note the following commentary regarding floorspace guidance in the CDP:

"These towns and villages provide basic convenience shopping, either in small supermarkets or convenience shops and in some cases provide small scale comparison shopping, for example local hardware shops, retail pharmacies and clothes shops.

While the GDA Retail Strategy generally considers that these centres will normally provide for one supermarket ranging in size from 1,000-2,500sqm with a limited range of supporting shops (one or two low range clothes shops with grocery, chemist etc) and retail services (hairdressers, dry cleaners), cafes and possibly other services such as post offices, community facilities or health clinics, it is considered necessary to make a distinction in Wicklow between the type and quantum of retail envisaged in neighbourhood centres in the larger settlements and that envisaged for small towns.

The retail provision in small towns would be expected to be more extensive, including one supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and perhaps 10-20 smaller shops. These towns can be expected to provide a similar function in terms of providing for the day to day shopping and service needs of the local population.

Small towns should be the main service centre in the rural area, providing a range of facilities, shops and services, at a scale appropriate to the needs and size of their catchment.

CPO 10.6 To permit the nature and scale of retail development appropriate to enable each centre to perform its role and function as defined within the County Retail Strategy. The nature and scale of a development proposed (either by themselves or cumulatively in conjunction with other developments) in a centre shall not compromise the role or function of any other centre within the hierarchy, in particular the role and function of a centre that is of a higher level in the hierarchy above that which is being considered. [Our Emphasis]

We submit as follows arising from the above:

1. The reference to 'one supermarket' is indicative only, with numerous examples of multiple supermarkets being provided in similar Level 4 centres across the Greater Dublin Region. The LAP should clarify that such guidance is not binding;⁵
2. The reference to *up to 1,000sqm aggregate* is also indicative and should not be interpreted as an upper limit (as is made clear in all high level retail planning policies including the Regional Retail Strategy and the Retail Planning Guidelines). The LAP should clarify that such guidance is not binding; and,
3. If the reference to a *single* supermarket or a scale of *up to 1,000sqm aggregate* were binding or fixed, the overarching objectives of the CDP or any LAP would be unimplementable, e.g. in terms of the town fulfilling its function as a service centre and being more self sufficient, reversal of town and village centre decline, etc.

⁵ Including for instance Rathbeale in Swords, Portmarnock, Tyrellstown and Lusk in West and North Dublin / Fingal (also permitted in Donabate) along with Glenageary and Deansgrange in Dún Laoghaire-Rathdown) and Newcastle in South Dublin.

3.4 The Regional Retail Strategy

We note the following extracts from the Strategy:

*"The Strategy aims to set out a co-ordinated, sustainable approach to the assessment and provision of retail within the GDA so that... **Adequate and suitable provision is made to meet the needs of the growing and changing population, both overall and locally, and provide for healthy competition and consumer choice...***

- Choice: providing adequate retail permissions and development opportunities over the life of the Strategy to ensure that good market choice and competition is available; ensuring that retail is located where all members of society actively make choices about their destinations for shopping...

*... **the provision of new convenience shopping shall also be promoted and encouraged in areas of significant population growth, should that occur, or where there is a locally identified gap in provision and competition.** Applications should detail, if justifiable, that their scheme(s) will meet local demand without damaging existing traders, and how it will promote more sustainable travel modes and shorter distances of travel.*

*Neighbourhood / Small Town / Village Centre- **These centres generally provide for one supermarket or discount foodstore ranging in size from 1,000-2,500 sq.m** with a limited range of supporting shops (one or two low range clothes shops with grocery, chemist etc.) and retail services (hairdressers, dry cleaners, DVD rental) cafes and possibly other services such as post offices or community facilities or health clinics grouped together to create a focus for the local population.*

*For this reason it **is not the intention of this Strategy to present the figures as some form of cap on retail permissions for each Council, but to guide the scale of overall provision of retail; whilst taking into account the need to provide more local retail to reduce long distance travel for lower order shopping and encourage local provision of regular shopping needs.** It is within this context that the results of the quantitative floorspace need assessment are now presented."* [Our Emphasis]

The above demonstrates the need for a primarily *qualitative* approach to considering retail proposals, based on the scale proposed relative to the intended function of the settlement centre, and not reliance on arbitrary thresholds.

3.5 Issues Arising & Way Forward

Having regard to the foregoing, we request that the Planning Authority reconcile inconsistent / conflicting objectives of the CDP through clarification of core principles via the forthcoming LAP. Specifically:

1. Reaffirm the important Level 4 status of Kilcoole Town Centre;
2. Reaffirm that as a 'small town' Kilcoole is of higher importance than Neighbourhood Centres, notwithstanding being in the same Level 4 category (as stated in the CDP);
3. Confirm that all sub-categories of convenience retailing are appropriate in the town (including Discount Foodstores);
4. Confirm that the *1,000sqm aggregate* reference is an indicative guideline and not a limit with the Regional Retail Strategy guidance remaining relevant; and,
5. Confirm that any proposals for retail floorspace within the town centre will be assessed on their merits and principally having regard to their compatibility with the strategic role and function of the town, taking precedence over any indicative floorspace guideline.

4.0 CONCLUSION

In summary, we request that Wicklow County Council replace the existing LAP with a new LAP that takes account of the current and significantly evolved retail sector, and allow sufficient scope for its continued evolution (as is the intention of the Retail Planning Guidelines).

At present the existing LAP and CDP contain conflicting and contradictory references, which can be interpreted to act as barriers to otherwise reasonable and proportionate development.

We request that the Planning Authority take the opportunity of the LAP to provide local and specific guidance to appropriately interpret the principles of the CDP to development in Kilcoole.

This would result in a primarily *qualitative* approach to the assessment of future proposals in the town.

I trust the above is of interest and will be considered in the formulation of the Local Area Plan and we look forward to reviewing and commenting on any Draft LAP arising.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Fintan Morrin', is written over a horizontal line.

Fintan Morrin
Principal
The Planning Partnership