

	<h1>Greystones-Delgany & Kilcoole LPF Variation No.4</h1>
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Who are you:	Agent
Name:	Lidl Ireland GmbH
Reference:	GDKLPF-173039
Submission Made	June 13, 2025 5:46 PM

Choose one or more categories for your submission. Please also select which settlement you wish to make a submission / observation about.

- Proposed Changes to Volume 1 of the Wicklow County Development Plan 2022-2028
- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

Local Planning Framework PART A Strategy

- A.1 Introduction
- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole
- A.3 Factors influencing future development options
- A.4 Overall strategy

Local Planning Framework PART B Settlement Specific Objectives.

- B.1 Town Centre Regeneration
- B.3 Economic Development

- B.5 Community development, including schools, and active open space
- B.8 Land Use Map and Zoning
- B.9 Specific local objectives (SLOs)
- Other topics

Write your observations here:

See Attached.

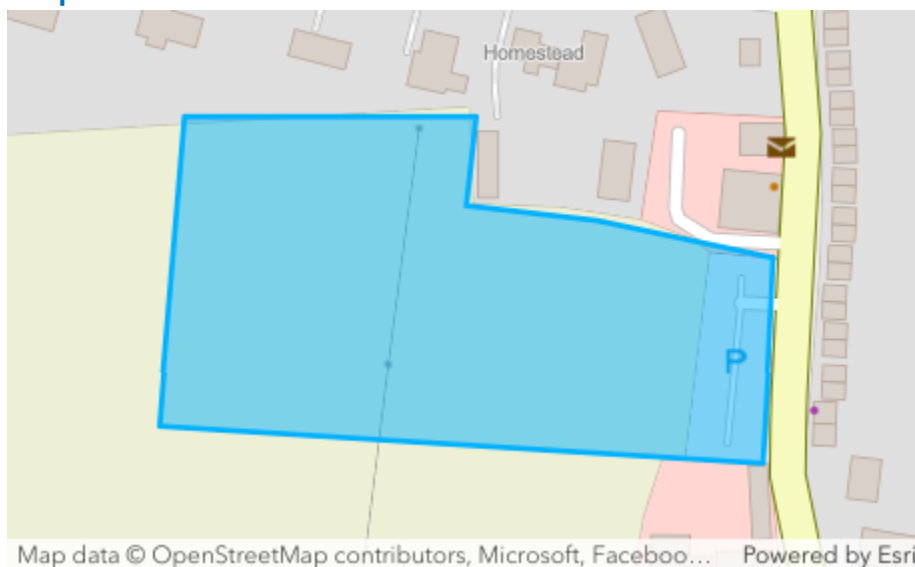
Please select which town you want to comment on:

Kilcoole

Observation relevant to the settlement:

See Attached

Map

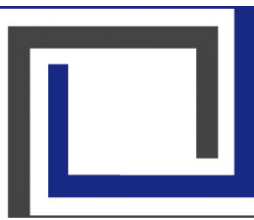


Site Description:

Main Street, Kilcoole, to the south of the Mollys (formerly Breeches) Public House and to the north of the existing terrace of buildings

Upload a File (optional)

Lidl Kilcoole Submission to Draft LPF & Var4.pdf, 6.94MB



Greystones-Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 to the County Development Plan 2022 - 2028

'Variation No.4', Administrative Officer
Planning Department, Wicklow County Council, County Buildings
Station Road, Wicklow Town, A67 FW96

Friday, 13th June 2025

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

Dear Sir/Madam,

RE: SUBMISSION TO THE GREYSTONES-DELGANY & KILCOOLE LOCAL PLANNING FRAMEWORK (LPF) 2025 / VARIATION NO. 4 TO THE COUNTY DEVELOPMENT PLAN 2022 – 2028 ON BEHALF OF LIDL IRELAND GMBH

1.0 INTRODUCTION & SUMMARY

The Planning Partnership, 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 *Greystones-Delgany & Kilcoole Local Planning Framework (LPF) 2025 / Variation No. 4 to the County Development Plan 2022 – 2028* in relation to lands at Main Street, Kilcoole.

We note that the lands are subject to a live planning application [Reg. Ref: 24/60545](#) for a Lidl Foodstore along with residential and café use.

We refer to our previous 'pre-draft' submission, extracts of which (relating to background retail planning considerations) are included under Appendix A, extracts of the Planning Application Cover Letter (elaborating on the retail planning merits of the current application) under Appendix B and extracts of the Architectural Design Statement (illustrating the design and public realm merits of the scheme) under Appendix C.

Overall, our client requests that the final LPF 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. The LPF should also 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 LPF as currently drafted does not do so, which in turn will undermine the realisation of the strategic objectives of the LPF for the town centre, and will dilute the settlement and retail hierarchy of the County as a whole, by inverting the intended distinction between town centres like Kilcoole and Neighbourhood Centres in the wider area.

The LPF should encourage proportionate retail provision, to enable the town centre of Kilcoole to fulfil its function and potential, with no restrictions on scale that could impede the provision of Foodstore / Supermarket type development therein.

Similarly, the land based objectives (zoning, opportunity site and specific local objective) relating to the area require revision to ensure their proper functioning and relevance to the achievement of the spirit and intention of the *LPF*. Section 2.0 below details the proposed amendments to the *LPF*, as elaborated on and supported by the following Sections 3 & 4 of this submission.

2.0 AMENDMENTS SOUGHT TO THE DRAFT LPF

In short, we request that the following amendments be made to the *Draft Greystones-Delgany & Kilcoole LPF* / Variation no. 4:

1. That the *Town Centre* zoning objective boundary be extended to include the entirety of the subject site;
2. That the 'uses generally appropriate' within the Town Centre zoning objective be amended to include *Supermarket / Foodstore or Medium Sized Supermarket / Foodstore*;
3. That the *SLO5* objective boundary be reduced to omit the part of the subject site currently within the *SLO5* objective boundary (corresponding to the above zoning objective extension);
4. That the Opportunity Site *OP8 Kilcoole West – 'The Mollys'* be reconfigured to:
 - a. Be reduced to the South and expanded to the West match the boundary of the subject site (corresponding to the above zoning objective extension / *SLO* reduction);
 - b. Be amended to reflect the conceptual layout of the current mixed use scheme under consideration in [Reg. Ref: 24/60545](#); and,
 - c. Provide an updated set of text objectives.
5. That Table 10.1 of the Development Plan be amended to omit any reference to a 1,000 sqm aggregate threshold;
6. That Section B1.5 Kilcoole of the LPF be amended to omit any reference to a 1,000 sqm aggregate threshold;
7. That a new objective, *GDK13a*, be included to affirm the greater importance of *Small Towns* relative to *Neighbourhood Centres*, in keeping with the explicit and established principles of the Development Plan, for instance, as follows (or to similar effect):

<i>GDK13a</i>	<i>Within Small Towns, it is the objective of the Planning Authority that retail provision would be expected to be more extensive than Neighbourhood Centres. As such, and given the overarching importance of reducing leakage and promoting the expansion of retail floorspace first and foremost within core retail areas, there shall be no quantitative threshold on the provision of retail floorspace subject to adherence to the qualitative role and function of the Town as outlined in the Retail Strategy.</i>
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8. In the event that Table 10.1 and Section B1.5 are not amended, an alternative *GDK13a*, for instance, as follows (or to similar effect):

<i>GDK13a</i>	<i>Within Small Towns, it is the objective of the Planning Authority that retail provision would be expected to be more extensive than Neighbourhood Centres. As such, and given the overarching importance of reducing leakage and promoting the expansion of retail floorspace first and foremost within core retail areas, there shall be no quantitative threshold on the provision of retail floorspace subject to adherence to the qualitative role and function of the Town as outlined in the Retail Strategy. Thresholds referenced in Table 10.1 and Section B1.5 of the Plan shall not apply in such instances.</i>
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3.0 THE SUBJECT LANDS

The subject site is located at Main Street, Kilcoole, and forms a gap in the existing street, to the south of the Mollys (formerly Breeches) Public House and to the north of the existing terrace of buildings.

The existing site measures c. 1.2 hectares overall and is comprised of two areas, the first being an informal car parking area with a collection of container type structures separated from the open agricultural land forming the balance of the site to the rear.

The site slopes considerably from North to South, which has informed the design and layout of the subject scheme, with the proposal seeking to reconcile these level changes whilst providing a conventional shopping experience.

The site bounds residential use to the North (to the West of the Public House) and future residential use (currently agricultural) to the West and South. A mix of uses prevail, including residential, to the Southeast and Eastern site boundaries.

As noted above, proposals are currently under consideration for a Foodstore anchored mixed use scheme on the site (Figures 2 & 3 and Appendix C illustrate) including 5 no. dwellings and a café unit facing the Main Street.

The proposed Lidl demise (i.e. less the proposed shared access road / permeability link¹ to the landbank to the rear) is in the order of 0.95 hectares.

Figure 1: Aerial View of Principle Subject Site (Approx. Boundaries Outlined in Red)



Source: Bing Maps, annotated by The Planning Partnership

¹ We note that this link is not intended to become a primary vehicular link for the larger (SLO5) landbank, rather primarily a pedestrian and vehicular route. Any connectivity beyond the proposed Lidl site would be a matter for subsequent / separate planning application(s). We note the emerging masterplan for those lands (see Figure 5 and Appendix C) – which remains only indicative in nature – currently envisages only a pedestrian / cycle / active travel connection.

Figure 2: Scheme Concept



Source: Darmody Architecture

Figure 3: Scheme Illustrations



▲ View from Main st. Looking North
The design of the proposed two-storey buildings that address mainstreet



▲ The proposed corner Cafe
as a transition of scale from Cottages to Pub



▲ View from Main st. Looking South
Traditional roof scape steps down the Hill



▲ View from the rear of the site/ carpark
to Lidl Supermarket Entrance

Source: Darmody Architecture

4.0 THE DRAFT LPF AND ISSUES ARISING

4.1 Kilcoole in the Retail & Settlement Hierarchies

The LPF states that "Kilcoole is a Level 4 settlement in the County settlement hierarchy – a 'self-sustaining town'" and that "Level 4 settlements are identified as either 'Level 3' or 'Level 4' in the County retail hierarchy, with Kilcoole being designated as Level 4." The LPF further states that "'Self Sustaining Towns' described as 'towns 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'."

And that "these towns should aim to become more self-sustaining by concentrating on ... catch-up facilities..." and that "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." The LPF also states that:

*"Kilcoole has experienced significant housing growth over the last 20 years and is now in need of catch-up investment particularly with respect to improvement of **the town centre which has somewhat 'hollowed-out' and is suffering from vacancy and dereliction.** There is potential to pursue public realm and placemaking improvements within the town centre to create a stronger urban structure, deliver improved community and recreation facilities, strengthen the town's identity and sense of place, and provide for a high quality of life.*

***Kilcoole has developed in manner that has resulted in some hollowing-out of the centre,** leaving a number of central vacant sites along the Main Street, and it is crucial during this LPF period and beyond that this is addressed and town centre regeneration is a priority.*

*The residential, employment and retail growth that has occurred in Kilcoole over the last 20 years has generally been located around the periphery of the historic town centre (the Main Street between the Newtownmountkennedy Road Junction and Catholic Church). **The centre has become 'hollowed out'** with a significant number of vacant sites and buildings, which are degrading the overall appearance, identity and usability of the centre. It is essential that a regeneration programme for this area is developed; such a programme needs to consider the regeneration of the vacant sites, a reduction of the dominance of the car, enhanced sustainable movement and transportation options including improved infrastructure for walking, cycling and accessing public transport (including links to the train station) and improved public realm / public recreation etc." [Our Emphasis]*

It is therefore apparent that the town centre is failing, both in terms of maintaining the towns traditional vitality and viability, and also failing to live up to the demands of modern residential expansion in recent decades. It appears that it is the objective of the Planning Authority to address such, however in order to achieve this, barriers to same should be avoided (including those within the Plan itself).

For instance, if it is the intention of the Planning Authority that Kilcoole 'catch up' and provide the basic services that the local population expect of a settlement centre, there should be no conflicting objectives or restrictions preventing this to occur.

The LPF as currently drafted contains materially conflicting objectives and what could be interpreted as restrictions in this regard, in a number of respects, including:

- The extent of the town centre zoning boundary;
- The Opportunity Site (OP8) and Specific Local Objective site (SLO5) designations / boundaries; and,
- The Supermarket floorspace parameters referenced.

4.2 Development Strategy and Town Centre Objectives for Kilcoole

In addition to the Retail & Settlement Hierarchy objectives, we note the *LPF* also includes a Development Strategy and Town Centre Objectives which *inter alia* state as follows, with our comments included.

Strategy / Objective	Our Comment
2. To build on the dynamism between the settlements of Greystones-Delgany and Kilcoole, so that each settlement develops in a mutually dependent and complementary manner as a prosperous and growing community. Each settlement shall have a distinct identity and shall perform a function in sustaining its own local community and in providing enhanced opportunities for the creation of new local enterprise.	The current zoning and retailing objectives would prejudice the achievement of this objective, as Kilcoole would fail to establish itself as a meaningful retail centre, being undermined by existing larger Neighbourhood Centres in the wider area. Town Centres should take priority over Neighbourhood Centres irrespective of whether in same level of the Hierarchy, as is the stated aim of the Development Plan (Table 10.1).
5. To focus on the dense, mixed use regeneration and development of town and village centre infill sites (particularly vacant or under-utilised sites) that are currently served or proximate to public transport services, as a priority above edge of centre or peripheral, greenfield locations.	The current zoning and retailing objectives would prejudice the achievement of this objective, as they encourage the consolidation of necessary retail functions outside of the Town Centre, favouring existing larger Neighbourhood Centres.
GDK7 To promote Kilcoole town centre as the priority location within the settlement of Kilcoole (above edge of centre or peripheral location, even where zoned) for new residential, retail / retail services, community, cultural and employment development, through the development of vacant or underutilised sites and via the reconfiguration / redevelopment of existing low density development, while at all times respecting the character and heritage of the town centre. In particular, to support the development of opportunity sites in accordance with the specific criteria set out for each identified area within this LPF.	The current zoning and retailing objectives would prejudice the achievement of this objective, as they discourage private sector investment from locating in the town centre, encourage the consolidation of important retail functions outside of the Town Centre (favouring existing larger Neighbourhood Centres), and promote other methods of reaching customers (e.g. online sales and deliveries).
GDK9 To support and facilitate improvements to the public realm in Kilcoole town centre to provide an attractive, comfortable environment for pedestrians, cyclists and users of public transport...	
GDK10 To require the design of all new developments in Kilcoole town centre to be of the highest architectural quality, that reflects the traditional scale / massing, unique design features, materials, format / patterns of development in the town centre. All new developments (of any scale) shall include a Design Statement showing how the features of the existing town centre have been considered and addressed in the design of any new development.	The current zoning and retailing objectives would prejudice the achievement of this objective, by arbitrarily restricting the appropriate scale of development from taking place.

4.3 Type / Scale of Retail Appropriate in Kilcoole

The *LPF* states that "retail is a key function of Level 3 and 4 towns and a thriving retail sector is essential to maintain vitality and vibrancy in the core areas of the towns and to maintain the towns as the focal points for the wider rural areas in which they are located." And that:

"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 and village centres to evolve and diversify. The strategy for Greystones – Delgany and Kilcoole town centres will therefore be based on the following objectives:

- **Facilitate an appropriate expansion of retail floorspace to reduce leakage of expenditure from both the town / village 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 / village 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." [Our Emphasis]

Conversely however, contradicting the above, the LPF also states that:

"Level 4 centres like Kilcoole generally provide basic convenience shopping, either in small supermarkets or convenience shops ...

The retail provision in Level 4 towns would be expected to include one supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and perhaps 10-20 smaller shops and retail service uses (such as post office, hairdressers, cafes, drycleaners etc). Such small towns should be the main service centre in their catchment, providing a range of facilities, shops and services, at a scale appropriate to the needs and size of their catchment. Encouragement shall be given to uses which support the community and help solidify the role of the centre as an important local centre such as community services, medical clinics, social services, pharmacies, They should where possible provide a focus for economic development and local product or rural-based industries, including markets for locally-produced food and other products.

Kilcoole currently has a good range of retail / retail services and community facilities including two medium sized convenience stores, two pharmacies, medical facilities (health centre and doctors, physiotherapist's surgeries), post office, petrol station, a number of hairdressers / barbers / beauticians, cafes and other local shops and services. Additional retailing is provided in some of the employment districts to the south of the town centre including furniture / homeware goods and hardware." [Our Emphasis]

In our opinion, there are clearly conflicting and counter-productive objectives and statements within the LPF. For instance, the LPF states that *the centre has become 'hollowed out' and that 'towns and villages are continually evolving; this is essential for their survival'* and that the Planning Authority will be 'flexible' yet the quantum's referenced above (up to 1,000sqm aggregate) would have a directly opposite effect, if fully implemented.

If an aggregate of 1,000 sqm were imposed as an absolute requirement, this would detrimentally impact the achievement of most if not all of the LPF retail and town centre objectives. We note that a 1,000 sqm threshold, on an individual unit basis, is not a credible or tenable threshold for a settlement such as Kilcoole, given its role and function, and the existing and acknowledged leakage and under provision.

For instance, the Retail Planning Guidelines note that Supermarkets are up to 2,500 sqm net in scale. An aggregate of 1,000 sqm for the whole town would preclude even one small Supermarket, and no other competition or variation. Appendices A & B elaborate on the wider context of unit sizes in this regard.

Further, it is not conceivable that the town centre decay and leakage could be addressed, whilst at the same time enabling such a de facto embargo on development in the town centre.

It is therefore apparent that that the aggregate of 1,000 sqm cannot be given effect or implemented, and must be overruled / balanced against the overwhelming weight of objectives that favour a more qualitative approach, i.e. where a new Foodstore / Supermarket can be accommodated in principle.

Therefore, and otherwise, it would be in the interests of clarity and consistency to omit any reference whatsoever to floorspace limitations or thresholds, in respect of Kilcoole in particular.

In addition to the above, we note the *LPF* also includes a Retail Objectives which *inter alia* state as follows, with our comments included.

No.	Strategy / Objective	Our Comment
GDK11	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.	Imposing or suggesting a threshold of an aggregate of 1,000 sqm is wholly incompatible with this objective. Provision of a Supermarket in the town centre of Kilcoole would help to achieve this objective. Given the specificity of the objective, and the generic and arbitrary and outdated nature of the floorspace reference, the objective should and does in our view take precedence.
GDK12	To vigorously protect and promote the vitality and viability of town and village centres. Development proposals not according with the fundamental objective to support the vitality and viability of town / village centre sites must demonstrate compliance with the 'sequential approach' before they can be approved. The 'sequential approach' shall be applied and assessed in accordance with the 'Retail Planning Guidelines, (DoECLG, 2012)' ¹⁵ . The Planning Authority will discourage new retail development if they would either by themselves or cumulatively in conjunction with other developments seriously damage the vitality and viability of existing retail centres within the County.	Imposing or suggesting a threshold of an aggregate of 1,000 sqm is wholly incompatible with this objective. It would ensure that Kilcoole Town Centre remains below / smaller than other existing Neighbourhood Centres in the area which is directly at odds with County Development Plan policies and objectives. Provision of a Supermarket in the town centre of Kilcoole would help to achieve this objective.
GDK13	Within neighbourhood centres, it is the objective of the Planning Authority to protect, provide for, and improve the mix of neighbourhood centre services and facilities, which provide for the day-to-day needs of the local community, to a degree that is akin to their role and function as outlined in the Retail Strategy. Development which would undermine the role of the town / village centre will not be permitted.	The existing Neighbourhood Centres in the vicinity already undermine the role of Kilcoole Town Centre. The imposition or suggestion of an embargo on further development, by applying a threshold of an aggregate of 1,000 sqm, would conflict with this objective. Provision of a Supermarket in the town centre of Kilcoole would help to achieve this objective, by reducing the current imbalance.

4.4 Opportunity Site Designation / Concept

The *LPF* also includes 'Opportunity sites'² including *OP8 Kilcoole West* – 'The Mollys', representing a substantial portion of the subject site³ where the *LPF* notes as follows:

These TC zoned lands measuring c. 0.84ha comprise lands to the west of Main Street, south of 'The Mollys' public house. The lands along the street are in use as a surface car park, with the remainder undeveloped / in agricultural use. The site is suitable for a mixed use development.

² The *LPF* notes that these, "if developed, contribute to the enhancement of the public realm, streetscape vibrancy and vitality, and the retail / services offer in the various 'centres' throughout the settlements. There are underutilised and unoccupied properties within Greystones- Delgany and Kilcoole that could be redeveloped to contribute to the enhancement of the town and village centres and any development proposal for these sites should have regard to the objectives of the County Development Plan and this *LPF*... For a number of the *OPs* concept sketches are shown in this *LPF*. These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road layouts or building positions/designs. Any application for permission on said lands must conform to all standards and requirements of the Planning Authority, as set out in this *LPF* and the Wicklow County Development Plan."

³ We note the same issue of boundaries relating to town centre zoning, *OP8* and *SLO5* are all inter-connected as elaborated on in Sections 4.5 & 4.7 below also.

Objectives GDK OP8

- To support the development of these lands for mixed use development including commercial, retail, retail services, residential, community and cultural uses;
- Higher density development with no or limited car parking, that makes the best use of this serviced urban land, will be expected;
- High quality frontage onto all streets will be required, that provides for passive supervision and connectivity to the street.
- While access into these lands may be via a direct access onto Main Street (R761) any such access point shall not provide a through route to lands beyond this site, in particular lands to the west of this site.

Figure 4: Current LPF Opportunity Site Concept Plan (Approx. Lidl Scheme Boundaries Outlined in Red)



Source: Draft Greystones-Delgany & Kilcoole LPF / Variation No. 4

As noted above, the proposed *GDK OP8* extent is considered to be problematic in that it does not align with the functional block pattern of this area, or the pattern of land parcels / control. The current Lidl proposal (which has been formulated after an exhaustive process) involves a more linear / deeper East-West arrangement.

The proposed shared access road / permeability link to the landbank to the rear is the natural boundary to any opportunity site, with the lands to the South (currently in *GDK OP8*) being more suited to consideration as part of the larger landbank masterplan, i.e. as part of SLO5.

Thus, the inclusion of the lands to the South are an unnecessary complication to the realisation of the prime 'infill' site, being the proposed Lidl site (as overlaid in red in Figure 4 above).

The Planning Authority are therefore requested to amend the boundaries of *GDK OP8* to align with the extent of the Lidl scheme, which will maximise the relevance of the designation, and also be the most appropriate means of encouraging the realisation of the Opportunity Site designation in the short term.

With respect to the balance of the lands to the South, we submit that such could or should be included in a separate Opportunity Site designation or incorporated into the SLO5 lands designation, ensuring their consideration in strategic planning for the area.

In this regard we note that they have already been masterplanned by the adjoining landowner, as illustrated in Appendix C. Figure 5 below illustrates same.

Figure 5: Emerging / Indicative Masterplan – Draft (Approx. Lidl Scheme Boundaries Outlined in Red)



Source: Darmody Architecture Design Statement

Figure 5, and Figure 2 above, illustrate a high quality concept for the subject (and adjoining) lands, which are realisable in the short term, given the significant efforts by Lidl and the adjoining landowner over a number of years to arrive at this point.

As such the LPF Opportunity Site concept / sketch for GDK OP8 (with updated boundaries) should be amended to reflect the core elements of the above Lidl scheme.

Similarly, the Objectives under GDK OP8 should be updated accordingly, for instance, as follows (or to similar effect):

- To support the development of these lands for retail-led (medium scale Supermarket) mixed use with associated facilities and services, including car parking (which would be of wider benefit to the town centre);
- High quality frontage / materiality onto all streets will be required, that provides for passive supervision / animation and connectivity to the street;
- While access into these lands will be via a direct access onto Main Street (R761) any such access point shall not provide a substantial through vehicular route to lands to west of this site.

4.5 Land Use Zoning - Extent

The subject site is primarily proposed to be zoned Town Centre, with the exception of the western extents.

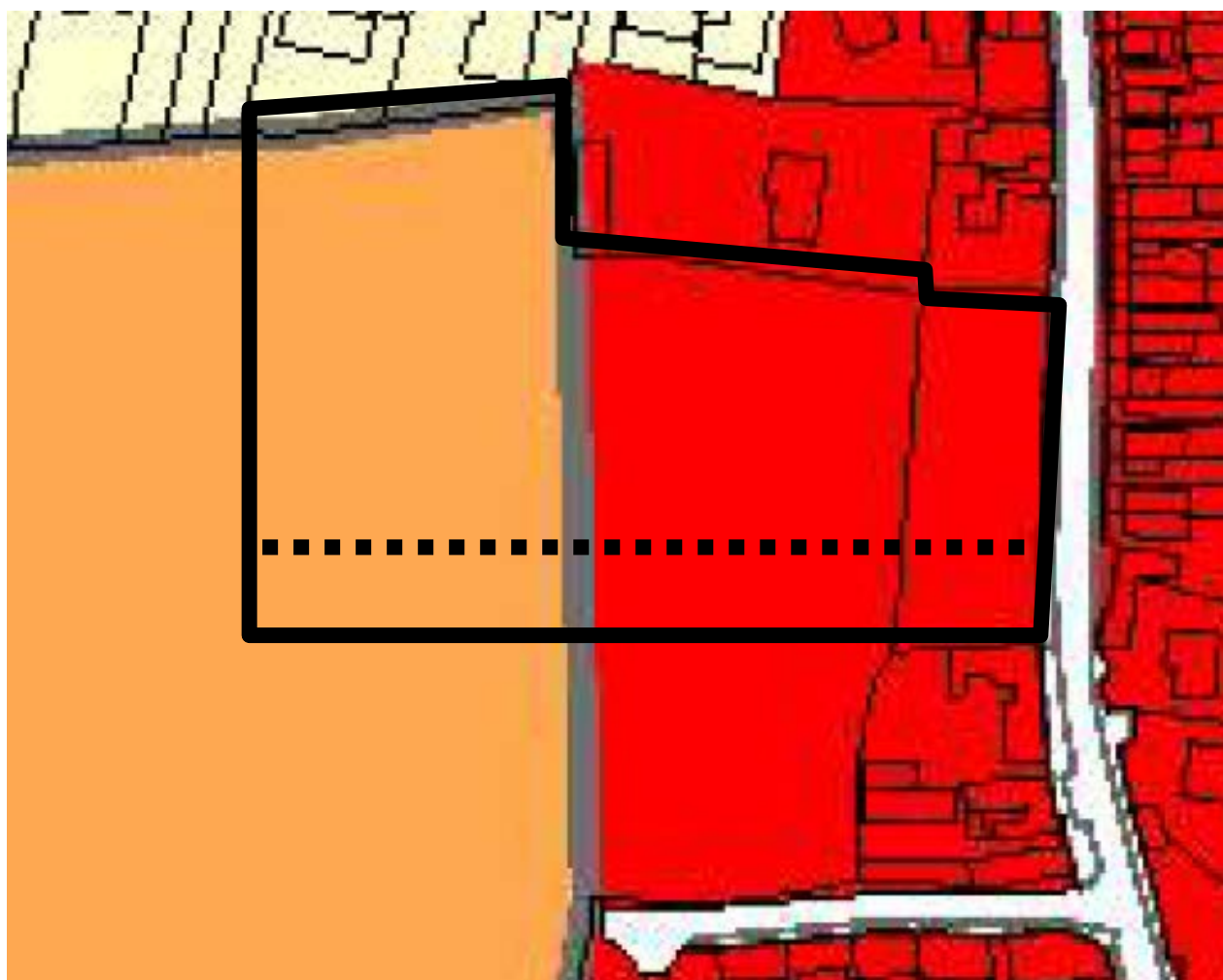
The exclusion of part of the subject site leads to an insufficient site / plot depth to achieve the stated aims for the town centre⁴, as demonstrated by the proposed scheme for the site (currently in the planning process) which requires a deeper plot.

In order for this important gap in the Main Street to be adequately and meaningfully infilled, the associated development plot should be sufficiently deep to accommodate the practical requirements of town centre uses, which includes requirements in terms of car parking, deliveries / servicing, etc.

We also note that the requirement to provide permeability to the Main Street also reduces the *Town Centre* use of the full frontage to Main Street, hence the greater need for additional depth of the Town Centre zone, to ensure a critical mass in terms of plot size. The dotted line below illustrates the approximate outline of the access road / permeability corridor.

Furthermore, the *Town Centre* zoning at present does not distinguish *non-town centre* uses to the South, e.g. Ashlawn, which interrupts the actual footprint of land available to town centre uses.

Figure 6: dLAP Land Use Zoning (Approx. Boundaries Outlined in Blue)



Source: Draft Greystones-Delgany & Kilcoole LPF / Variation No. 4

⁴ i.e. as set out in the zoning objective "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."

4.6 Land Use Zoning - Uses generally appropriate

Notably, the *LPF* provides a distinct set of uses generally appropriate for *town and village centres* separate to those for *neighbourhood centre, small local centres and local shops and services*, which would be an opportune means of graduating the scale of retail appropriate to different centre types, within the Level 4 category.

This further reinforces the need, as stated above, that the Small Towns be afforded the opportunity to achieve their stated objectives, which are explicitly to exceed the scale and function of Neighbourhood Centres, notwithstanding that both occupy Level 4 designation.

For instance, for "*Uses generally appropriate for town and village centres (TC / VC)*" this should be amended to include '*Supermarket / Foodstore*' or *Medium Sized Supermarket / Foodstore*.

4.7 Specific Local Objective (SLO5) Boundary

As noted above, in relation to land use zoning and opportunity site designation, the plot divisions within the *LPF* do not align with the parcels under the control and developability of various landowners and stakeholders.

The opportunity arises now to modify same to align with practical deliverable plot areas / sites (e.g. the Lidl lands boundary as illustrated in above Figures), including the *SLO 5 – BULLFORD*⁵.

We submit that removing the subject lands from SLO5 (at least the Lidl demise, e.g. if access road / permeability corridor was required to remain) would provide a more practical and appropriate designation for the SLO lands, as the Lidl subject lands have their own context separate to those of the wider landbank.

The Lidl subject lands / demise can and should be appropriately managed via the land use zoning and opportunity site designation, without inclusion within any SLO⁶ designation.

⁵ "These SLO lands are located west of Kilcoole Main Street and measure c. 10ha and are zoned for 'TC – Town Centre', 'RN2 – New Residential Priority 2' and 'OS2 – Natural Areas'. This area may be developed for a mix of uses including residential, community, commercial, retail / retail services and open space, in accordance with the following requirements:

- The development shall provide for a new residential community well served by on-site facilities and well connected to the wider settlement, including high quality pedestrian and cycling links to the town centre, adjoining residential areas and existing transport services.
- These lands shall be accessed only via Main Street at the Main Street – Sea Road junction, which shall be redesigned as a crossroads with traffic lights. Land measuring c. 0.6ha immediately west of this new junction shall be developed in accordance with the criteria set out in this *LPF* as 'Opportunity Site 7'.
- A total area of c. 7.5ha is zoned for new housing development which shall be divided into a least two distinct character areas / estates either side of a central green area, including a wide range of house types and sizes to meet the needs of all in society, including units suitable for older persons or people with accessibility needs.
- Community facilities shall be provided within the SLO area to meet the needs of the new resident community of the area. In particular, the development shall include at a minimum a childcare facility; in determining additional requirements for community facilities, a community services audit shall be carried out.
- Open space shall be provided with each phase of development as follows:
 - An undisturbed riparian corridor of at least 25m set back from the river (zoned OS2) shall be provided and any existing natural habitats, trees and hedgerows in this area shall be maintained.
 - A minimum of 0.4ha per 100 houses as fully serviced playing pitches, courts etc
 - A minimum of 0.15ha per 100 houses for casual recreation space, parks etc. A maximum of 50% of this form of open space may be provided for throughout the development as part of the 10-15% residential open space.
 - 500sqm per 100 houses for equipped play spaces e.g. playgrounds, MUGAs, outdoor gyms etc
 - The majority of the required open space as detailed above shall be provided in the form of 1 or 2 highly accessible large parks that provide for both active and casual recreation that include playgrounds, MUGAs and playing pitches / courts which shall be devoted to the use by the public accompanied by appropriate infrastructure, including parking where necessary and service / management buildings."

⁶ "The purpose of an SLO is to guide developers as to the aspirations of the *LPF* regarding the development of certain lands where more than one land use is proposed, where there is a new infrastructure necessitated on the subject lands or where the lands are zoned for 'mixed use' to give more detail on the development objective of these lands. A masterplan for the entire SLO area may be required to be submitted as part of the first application within the SLO. For a number of the SLOs concept sketches are shown in this *LPF*. These are conceptual only, did not include complete site surveys/analysis, and should not be taken as a definitive guide as to the acceptability or otherwise of any access points, road

5.0 CONCLUSION

In summary, we request that Wicklow County Council modify the draft *LPF* in order to enable the achievement of its, and the Planning Authority's, strategic objectives in relation to retailing and the town centre.

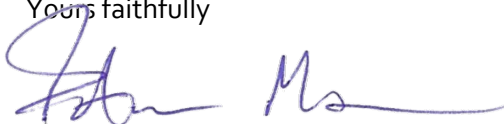
In its current form, there are a number of conflicting / counter-productive elements, which if implemented in an overly restrictive way, could detrimentally impact on the town centre and private investment therein.

With the inclusion of the proposed amendments, we consider that the potential of the subject lands and the designated role and function of the town centre as a whole (as envisaged by the overall thrust of the *LPF*) 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 could be inadvertently undermined for the lifetime of the *LPF*.

Yours faithfully



Fintan Morrin
Principal
The Planning Partnership

Appendix A

Pre-Draft Submission Extracts

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 emerge⁷ 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 m⁸.

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.

⁷ Page 52, Annex 1 of the *Retail Planning Guidelines* (2012)

⁸ 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'⁹ 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]*

⁹ 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 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.¹⁰

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 reenforced 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."

¹⁰ <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;¹¹
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.

¹¹ 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.

Appendix B

Planning Application Cover Letter Extracts

1.4.2 The Need for a Supermarket in Kilcoole Town Centre

We consider that the need for a Supermarket is unquestionable, both in policy and practical terms. The town is formally designated as a Self Sustaining Town (alongside and equal to Baltinglass, Enniskerry, Newtownmountkennedy and Rathdrum) at Level 4 of the Settlement Hierarchy. In the absence of a Supermarket it cannot be self sustaining.

The town is targeted to reach a population almost 5,000. We respectfully submit that a town of such scale would warrant adequate retail facilities and this would include modern Supermarket options. The town cannot and will not fulfil the objectives of the Development Plan if the Development Plan itself is being interpreted with the effect of preventing reasonable efforts to deliver on the objectives of the Plan.

If Kilcoole is not provided with a Supermarket, it will fall further behind in terms of its function not being fulfilled. Other surrounding towns and retail centres will continue to fill the void created by a prohibition on expansion in Kilcoole.

As noted in the enclosed Retail Impact Assessment (RIA), there is significant need for additional floorspace, sufficient to justify more than one additional Supermarket, such is the degree of absence and lack of progress in recent years, coupled with the continued population growth in the town.

As demonstrated in the enclosed RIA, Lidl already have an extensive customer base in Kilcoole, with Kilcoole residents travelling to Lidl Greystones and Wicklow town stores, as they are unable to fulfil their convenience shopping needs in the town, illustrating a significant failure of retail planning policy in the town to date. This pattern is likely to be mirrored at other local supermarkets and centres (e.g. Charlesland, Newtownmountkennedy, etc.).

The presence of two medium sized convenient stores, Tesco Express and Centra, with a cumulative provision of c. 830 sqm does not mitigate the absence of a modern and fuller scale 'trolley' offering, as is acknowledged by planning policy (see Section 1.4.3 below).

Existing provision should therefore not be misrepresented as being sufficient, or close to sufficient, to meet the needs of the town. In short therefore, whether or not the Planning Authority maintain a de facto embargo on the improvement of retail facilities, customers will continue to shop in Supermarkets.

The question is rather where or how they will shop, i.e. either in other towns / neighbourhood centres or via online shopping methods. Both of these negative outcomes are considered to be occurring (at scale) at present, with significant evidence of the former and anecdotal evidence of the latter.

Both scenarios would continue to actively prejudice the achievement of the numerous settlement and retail planning policies of the Planning Authority. The sole apparent obstacle to resolving this issue appears to be an outsized reliance on a relatively arbitrary, generic and outdated comment in the Development Plan referencing a potential (and not absolute) threshold of 1,000 sqm.

The weight of support and evidence demonstrating a clear and overwhelming need for a Supermarket in the town far outweighs the passing and outdated reference to an upper limit threshold of 1,000 sqm.

1.4.3 The Retail Strategy for Kilcoole

The above refusal Reason no. 1 is wholly reliant on an isolated interpretation of *Table 10.1 Retail Hierarchy & Strategy for County Wicklow* which makes a passing reference that: *"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"*.

We respectfully submit that the above should not form the primary basis for interpretation of the Development Plan and retail policy.

We note the above text has been restated across numerous Development Plan cycles, being reused since at least 2010, without any reconsideration despite the almost unrecognisable nature of the retail sector (and customer expectations) compared to when the 2010 Development Plan was drafted (e.g. c. 2008).

We note the overall thrust of the above text is in fact in the context of ensuring that Small Towns have greater provision given their more important role than Neighbourhood Centres, and is an enabler for larger scale and not a limiter to smaller scale, by virtue of the emphasis on floorspace being more extensive.

In the local context we also note that an embargo on progress in Kilcoole will however have the entirely opposite effect, insofar as promoting the Neighbourhood Centre at Charlesland which itself exceeds the 1,000 threshold, as does the Lidl anchored Neighbourhood Centre in Greystones at >1,500 sqm net convenience floorspace.

Reliance on the above reference to *up to 1,000sqm aggregate*, above all other policy content and context, is therefore not tenable or reasonable in our opinion, not least as events and passage of time have considerably overtaken the relevance of any threshold.

The Development Plan, Retail Strategy, etc. have numerous other objectives and observations that are of equal and greater importance, for instance (as also noted in Section 2.4 below and the enclosed RIA):

- The *Retail Planning Guidelines* states that: *"the development management process must support applications for retail development which: are in line with the role and function of the city or town in the settlement"*;
- And: *"where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional retail impact studies **are not required**."* [Emphasis in Guidelines];
- And: *"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."*;
- The *Retail Strategy for the Greater Dublin Area 2008-2016* (RSGDA) states that: *"... 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"*;
- The RSGDA also notes a threshold of 2,500 sqm rather than 1,000 sqm for such centres as Kilcoole, which the refusal does not acknowledge or address;
- The RSGDA also notes that: *"assessments of future retail requirements are intended to provide broad guidance* as to the additional quantum of convenience and comparison floorspace provision. They should not be treated in an overly prescriptive* manner and should not seek to inhibit competition"*
- The RSGDA is adopted and overarching retail planning policy hence of significant weight and of greater hierarchical 'seniority' than the local Development Plan;
- The County Development Plan includes policies and objectives to: *"To protect and maintain the viability of town and village centres, target the reversal of decline and deliver sustainable reuse and regeneration outcomes"*.
- And: *"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."*;
- And: *"The identity of Kilcoole as a separate stand alone entity in the wider area shall be reenforced ... Kilcoole shall provide for the service and social infrastructure needs of its residents and its local hinterland. Development of social infrastructure is to keep apace with population growth. Kilcoole should aim to be an economically active town."*;

- And: *"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"*
- Table 10.2 of the Development Plan confirms that Small Towns are expected to have Supermarkets. As confirmed in the previous decision, the existing provision is not at the Supermarket scale, rather only 'convenience stores';
- And: *"CPO 5.1 To protect and maintain the viability of town and village centres, target the reversal of decline and deliver sustainable reuse and regeneration outcomes."*
- And: *"The challenge remains for planning authorities to protect the retail core of our town centres while simultaneously allowing development that will ensure the continued vitality and vibrancy of town and village centres."*
- And: *"These towns and villages provide basic convenience shopping, either in small supermarkets or convenience shops."*
- And: *"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."*
- And: *"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 above range of policies clearly outweigh any limited reference to a passing and outdated reference to an upper limit threshold of 1,000 sqm. We also note the reference to CPO 10.6 in Refusal reason no. 1 which we consider is not appropriate as the proposed development, at the scale proposed, will in fact be *appropriate to enable the centre to perform its role and function as defined within the County Retail Strategy.*

The enclosed RIA in particular also demonstrates this quantitatively, both in terms of illustrating the shortage of floorspace and also the absence of any material retail impact on other centres as a result of the proposed development. On the contrary, the prohibition or embargo on further floorspace in the town for the foreseeable future would be the antithesis of Objective CPO 10.6.

1.4.4 Town Centre Location v Out of Town Location

We note from a review of the previous proposals that suggestions have been made that an alternative location for a Supermarket would be appropriate, for instance out of town or out of the town centre. For clarity, we consider that the subject site location is the clear and overwhelming optimum location for the development of a Supermarket, being as it is in the geographic centre of the town and within the designated town centre, with no alternative location being equal to the subject site. The enclosed RIA further elaborates on same.

3.4 Scale of Retail Provision

We note, following Pre-Planning discussions, the issue of justification of the scale of provision arose, and has further arisen following the previous refusal. Section 1.4 above sets out a robust rebuttal of that refusal reason (no. 1) in terms of the Planning Authority's ability and obligation to balance the offending '1,000 sqm' reference with the overwhelming weight of the remainder of public planning policy, from the national to regional to local level, as set out above.

For the above detailed reasons, we submit that the references in the LAP and CDP to floorspace thresholds of 1,000 sqm are not barriers to the subject proposal, and as further set out herein, and detailed in the enclosed RIA where relevant.

The Regional Retail Hierarchy & Precedent

As noted above, the position of Kilcoole in the Settlement and Retail Hierarchy is governed by the County Development Plan sets out same, also informed by the regional context.

The Regional Retail Strategy and RSES sets out a hierarchy for the region including a number of other local authorities, whom contain a number of similarly designated Level 4 centres.

Other Local Authorities in the Greater Dublin Area for instance provide a similar hierarchical structure, following the same Level 4 category, referring to 'a' (singular) supermarket, following the Regional Retail Strategy convention.

In this regard, we note that a number of Level 4 centres throughout the Greater Dublin Area provide more than one Supermarket or Discount Foodstore, hence confirming that there is no actual restriction to a single unit in such centres.

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).

Whilst these centres are in differing local authority areas, they are all subject to the same Regional Retail Strategy and RSES conventions as Kilcoole.

In this regard, we submit that the overarching Regional Classification applies in Kilcoole also, i.e. that *"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."*

As noted above, the Planning Authority has already locally exceeded the notional 1,000 sqm in single outlets in Greystones Neighbourhood Centres. In this regard the scenario arising is as follows:

- The express intention of the Development Plan is to prioritise *Small Towns ahead of Neighbourhood Centres* in terms of allowing *"more extensive"* provisions in Small Towns such as Kilcoole;
- Permissions have been granted in *Neighbourhood Centres* substantially above the 1,000 sqm threshold;
- Permission for a scheme above the 1,000 sqm threshold was refused in *Small Towns* such as Kilcoole; and,
- Thus the effect of planning decisions to date is to prioritise *Neighbourhood Centres* and placing a de facto embargo on *Small Towns* in direct contravention of the Development Plan.

Thresholds are Indicative in the First Instance

We reiterate the Retail Planning Guidelines, which state 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."*

Convenience retailing has changed significantly in the period since the adoption of the LAP, and indeed since the CDP was drafted (before / during the Covid 19 pandemic).

For instance, 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. Online options serve to increase the availability of alternatives.

The Retail Planning Guidelines note in this regard that: *"the planning system should not be used to inhibit competition, preserve existing commercial interests or **prevent innovation**".* [Our Emphasis]

The Regional Retail Strategy also repeatedly highlights the issue of *"... the significant lead in times for certain types of development are taken into account- particularly schemes which augment existing retail or are infill town centre schemes which bring positive attributes to town centres."*

In this regard, the subject scheme is intended to serve the long term needs of Kilcoole, and no arbitrary cap should be applied that could prejudice same.

The CDP emphasises this point (albeit not explicitly regarding retailing, but being nonetheless applicable) stating: *"In cognisance that the potential of town centre regeneration / infill / brownfield sites is difficult to predict, there shall be no quantitative restriction inferred from this Core Strategy."*

This CDP reference aligns with long established retail planning principles including as noted above and in the enclosed RIA, for instance the Regional Retail Strategy comments that:

"It would be wrong ... to refuse consent to a scheme simply because it breached the County floor space need total... This approach is too rigid and clearly it is more realistic to allow for some flexibility in the interpretation of the floor space need figures..."

And:

"... achieving equilibrium between the impact of overprovision resulting in decline in a number of important centres, and under provision where competition and choice are suppressed is a delicate balance and is in many ways unachievable due to constant changing circumstances of population shifts in the GDA and economic flux as well as activity in the retail sector."

Finally, as is clear from the above examples of Greystones Neighbourhood Centres (Charlesland and Blacklion), the 1,000 sqm 'threshold' is not an actual limit, only a guideline to be considered in the overall context.

We therefore respectfully submit that reliance on a singular passing reference to a 1,000 sqm floor area is not a reasonable justification to restrict the achievement of other numerous objectives of planning policy.

Local Context

We note that the LAP states that Kilcoole is "*generally not considered suitable for discount foodstore*" and the CDP refers to a scale of "*one supermarket / two medium sized convenience stores (up to 1,000sqm aggregate) and perhaps 10-20 smaller shops*".

These references are not however restrictive to the subject proposal in our opinion, having regard to the well established principle of the provision of foodstores and supermarkets well in excess of 1,000 sqm (net) in Level 4 Centres throughout the Greater Dublin Area.

With regard to the specific 'exclusion' of allowance for Discount Foodstores, we note that this reference was a continuation of previous policy (as in the 2010-2016 Development Plan) which has now been replaced, with a 'small town' description that (notably) excludes such a comment regarding discount foodstores. As such, this provision no longer applies, as it is superseded by current CDP policies.

Furthermore, the CDP explicitly notes that Small Towns are to have a more extensive scale than Neighbourhood Centres, suggesting that Small Towns should provide a scale up to and including the upper end of the 1,000-2,500 sq.m range, with Neighbourhood Centres focusing on the lower end of the scale.

In order to achieve the appropriate hierarchy in Kilcoole, it is therefore necessary to exceed the notional figure of 1,000 sqm, as otherwise, the town could not fulfil its role relative to the nearby Charesland Neighbourhood Centre for instance, which is currently a primary food shopping location for the Kilcoole catchment (and has been permitted to have in excess of 1,000 sqm net in a singular unit).

Similarly, given the significantly larger population in Kilcoole compared to most other Small Towns, adaption of notional thresholds is appropriate, to reflect that Kilcoole is more aligned to a Level 3 retail centre in qualitative terms. Conversely however, Kilcoole is relatively poorly served in terms of food retailing, with only small scale facilities available, directly at odds with the stated objectives of the Planning Authority.

Food retailing is limited to 'basket' type shopping (e.g. Tesco Express, Centra, Nicky's Village Market, etc.) with no true Supermarket or 'trolley' type shopping available, notwithstanding the important service provided by existing retailers in the town.

The addition of a Supermarket or 'trolley' type shopping facility will however enhance the ability of the settlement to fulfil its designated role, and improve the quality of life of residents accordingly.

LAP or CDP Objectives not Prejudiced

Having regard to the foregoing, we submit that neither the LAP nor CDP Objectives would be prejudiced to the extent that there would be any barrier to a grant of permission for the subject proposal. Quantitative references are not in our opinion prescriptive, but rather indicative guidance, and also must be balanced with the long established Regional Retail Strategy guidance and ranges.

On a qualitative basis, the proposed development is wholly in line with the explicitly stated intentions of the LAP and the Development Plan, in terms of providing 'catch up' services such as retail for the local (growing) catchment.

The *Development Management Guidelines 2007* also clarify that only "*fundamental*" departures from, or proposals that would "*seriously prejudice*", the provisions of the Plan, would constitute a *material* contravention.

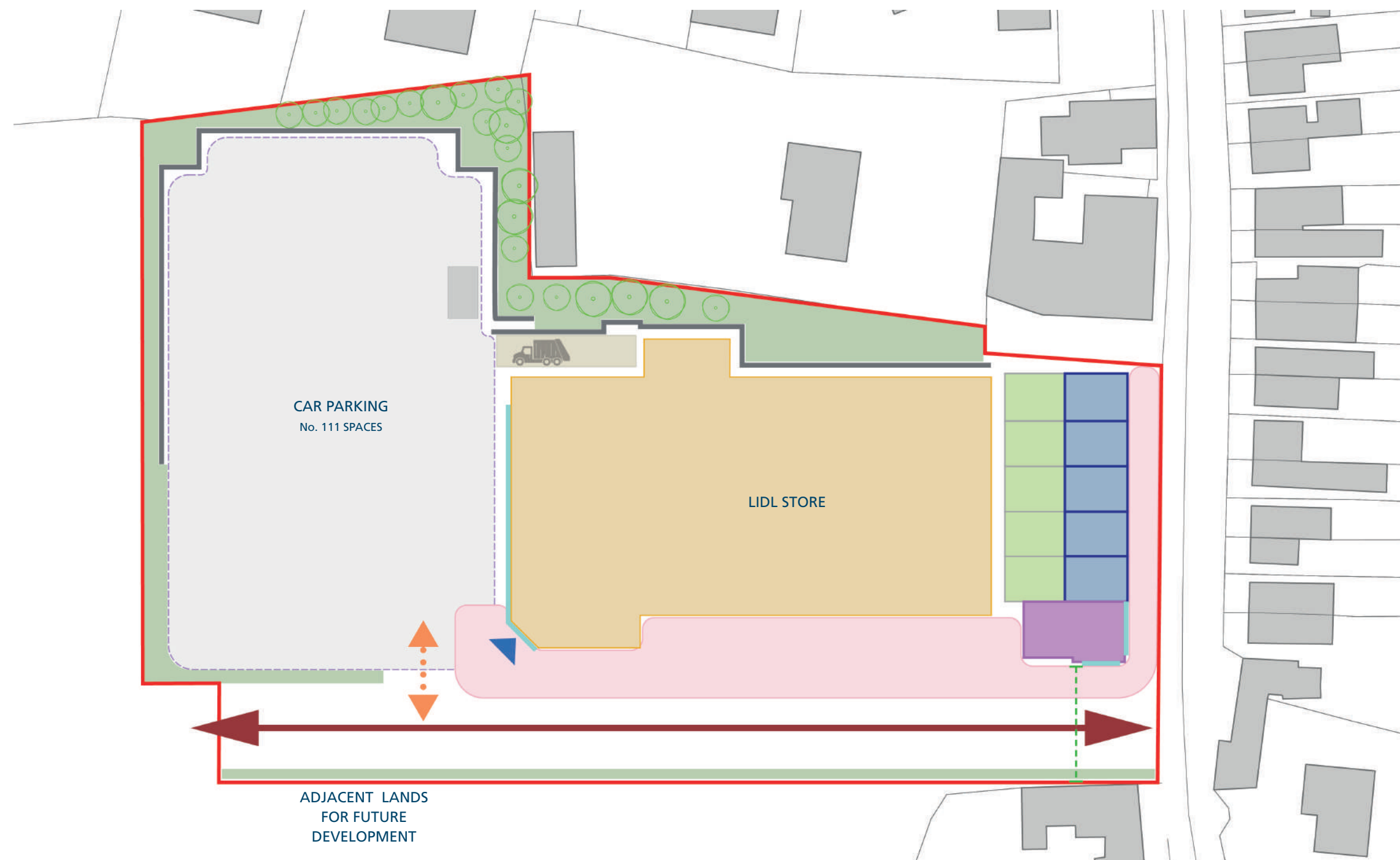
Accordingly, based on a reasonable review of the LAP and CDP referred above, we submit that the issue of contravention, material or otherwise, clearly does not arise.

Appendix C

Architectural Design Statement Extracts

Section 3 - Proposed Development

Concept - Proposed Solution

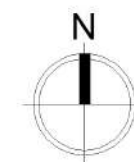


Proposed Layout

- Positive streetscape with own door houses and café addressing the main street
- Main Street and proposed new road junction activated with café & retail.
- Reduced gap to main street provides a good streetscape
- Supermarket entrance near car parking spaces
- Car parking overlooked by the supermarket front
- efficient use of TC lands with E/W roads along the southern boundary that offers the possibility to create a future active streetscape
- Proposed houses and café to hide the back of the store blank facade

Legend

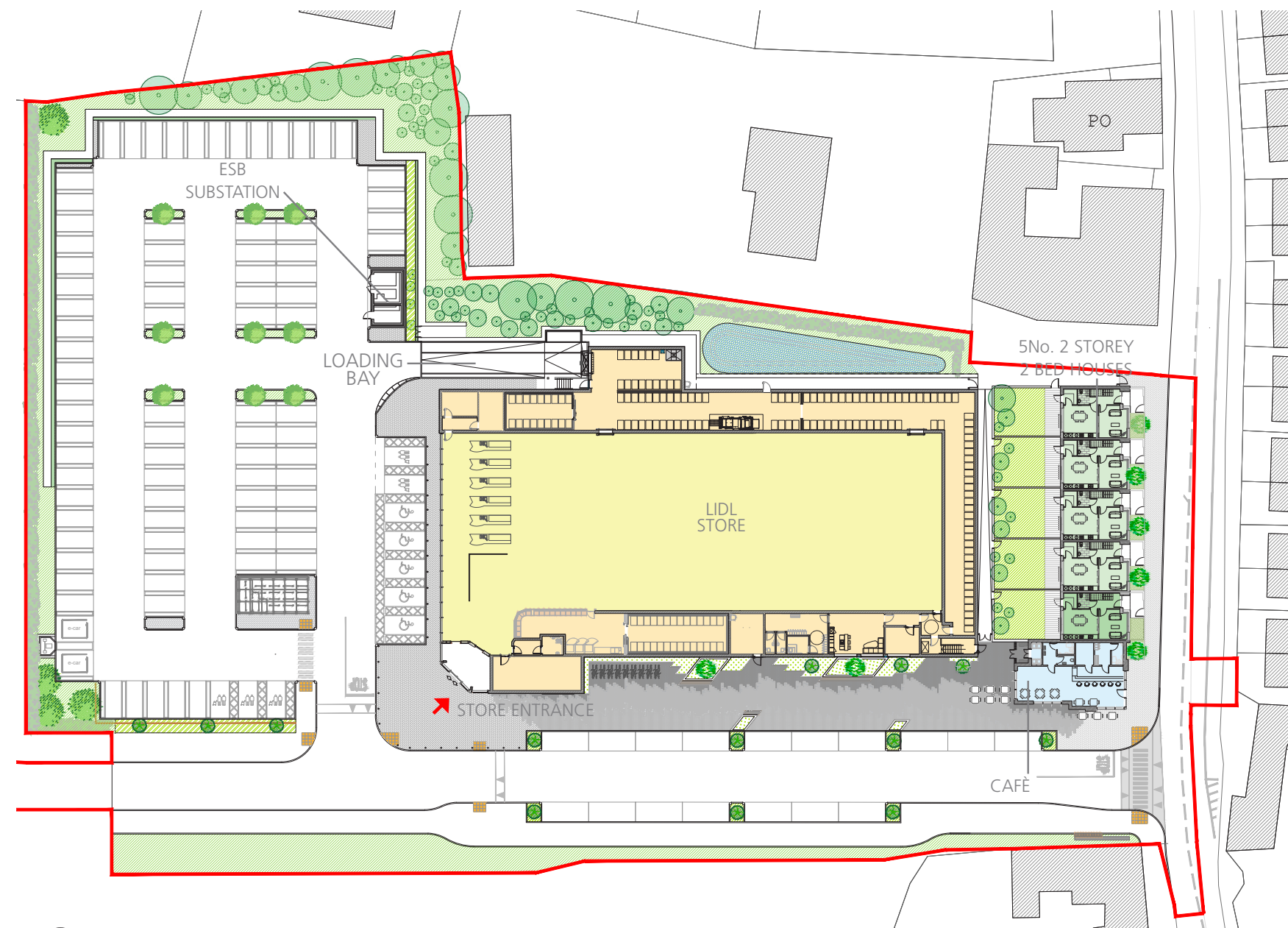
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|--|-----------------------|--|--|
| | Proposed Lidl Store | | Proposed Landscape |
| | Proposed Retail Units | | Proposed Vehicular Access to adjacent Land to be developed |
| | Proposed Car Parking | | Vehicular Access to Lidl Site |
| | Public Realm | | Lidl Store Entrance |



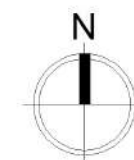
Section 3

Section 3 - Proposed Development

Proposed Site Plan - Design Quality



▲ Proposed Site Plan



The proposed design seeks to accommodate a new partial two-storey Lidl store, No. 5 houses and a Café, with all of the associated car parking and ancillary services, on a sensitive greenfield site located in the centre of Kilcoole Town center, along Main Street.

5no. own-door Houses are proposed facing the Main road to recreate and continue the existing streetscape. The café building is proposed to hold the prominent corner that will be created with the proposed access road to the lands at the rear of the site that will be development in future applications.

The Lidl supermarket has been located behind the street frontage, the houses lend themselves to being street facing to follow the rhythm and grain of existing smaller residential units with the anchor unit to the rear. The café+residential volume avoid the negative impact of the Lidl Store volume on the streetscape and also has commercial advantages; the smaller scale café will benefit from the adjacency to the anchor store that, in turn, will benefit from the streetscape activity that the specialist shops generate.

A new street is created to access the rear of the site from the Main street and to allow safety and ease of access for visitors arriving by car and for vehicles that will access the future town centre development. Parallel car parking spaces are proposed along the new street to serve the retail units and the future development that will be developed on the other side of the road.

The store vehicular entrance is being framed to minimise the gap in the main street streetscape.

The paths around the vehicular entrance have been designed to create a new enhanced public realm and pedestrian-friendly interface linking the main street and retail entrances.

The Lidl store entrance has been carefully located with a direct line of view onto the entrance street. The car parking has been interspersed with green planted zones and green landscaped boundaries to break down its visual impact whilst still allowing for efficient and easy-to-navigate car parking for customers. The landscaping scheme provides an attractive setting for the proposed store with potential links to future developments in the adjacent areas.

The high quality fully glazed elevation of the proposed Supermarket facing the car parking further helps to mark out the entrance and provide animation to the rear of the site.

The store's loading bay, waste storage areas, and ESB substation have all been located to the rear of the site, and are further buffered by new planting and acoustic screens which will ensure that they remain mostly concealed from view.

Proposed Areas:

Lidl Store Gross Floor Area:	2512 SqM
Café Gross Floor Area:	100 SqM
House 01 Gross Floor Area:	95 SqM
House 02 Gross Floor Area:	95 SqM
House 03 Gross Floor Area:	95 SqM
House 04 Gross Floor Area:	95 SqM
House 05 Gross Floor Area:	90 SqM
Substation and Switch Room GFA:	25 SqM

Total Car Parking No. 112 spaces including:
5 No. disabled spaces
5 No. parent & child spaces
2 No. electrical charging points

Total Bike Parking No. 18 spaces

Section 3 - Proposed Development Public Realm & Streetscape



▲ Proposed Site Plan - Public Realm - Highlighted proposed buildings to form streetscape



▲ Proposed Street Elevation

An important aspect of the proposed development is the proposed streetscape infill along Main Street with the access road to the Supermarket & carpark.

The continuation and enlargement of the existing footpath of Kilcoole Main Road will allow a pleasant and safe route along the proposed street frontage. The generous extent of glazing used for the café shoptfront creates an interaction between inside and outside. The own door houses proposed animate this improved public realm.

The addition of a group of street trees in front of the houses will soften the edge of the new infill development by creating a distinct character area that marks the transition of the building line.

A tight entrance is proposed for vehicular traffic entering and exiting the site designed for the safety of cyclists & pedestrians. Wide and safe paths direct people into the Lidl store from the main street which will contribute to overlooking of the surface car parking area.

On the southern end of the terraced houses is proposed a single-storey traditional

pitched roof café building that addresses the prominent corner.

An external seating area is located at the west of the café to create more privacy for café customers.

The proposed Lidl storefront west elevation is completely glazed to animate the car parking area and to be a distinctive element for the future development of adjacent lands.

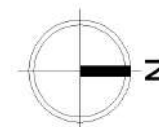
The three elevations have been carefully considered to ensure that there is sufficient ground-level activation at both ends which will provide for passive surveillance over the parking area and discourage any anti-social behavior. The landscape into and around the car parking is designed to soften the impact of the Lidl store car parking, with paved areas interspersed with trees, seatings, and Sheffield bike stands.

A large amount of uncovered bicycle spaces are proposed around this area.

From the main footpath, it is easy to access the northern side of the building, a quiet zone where the loading bay and delivery area are located. The proposed design maintains the north elevation also for the loading bay and plant compounds. For that reason this area is more private and out of view from the public realm.



▲ Proposed facade treatment to ensure continuation with adjacent street.



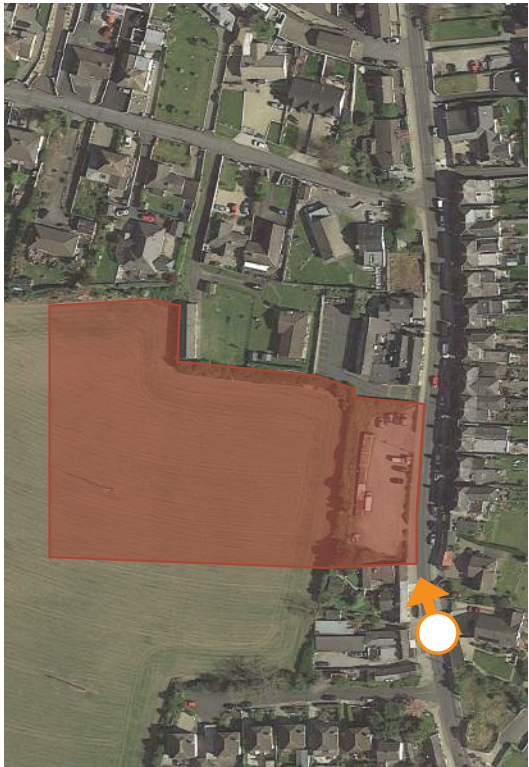
Section 4 - Proposed Images
CGI 01 - View from Main Street looking North



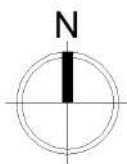
▲ Proposed CGI 01 - View from Main Street looking North



▲ Existing Image



▲ Key Map



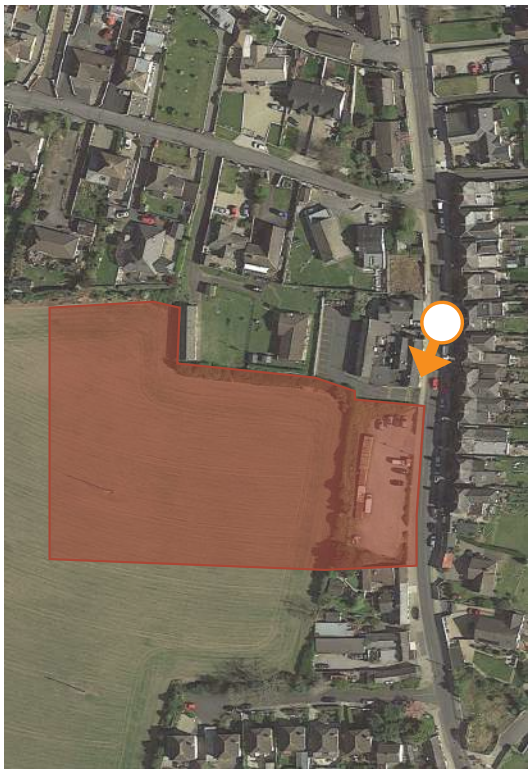
Section 4 - Proposed Images
CGI 02 - View from Main Street looking South



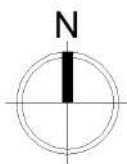
▲ Proposed CGI 02 - View from Main Street looking South



▲ Existing Image



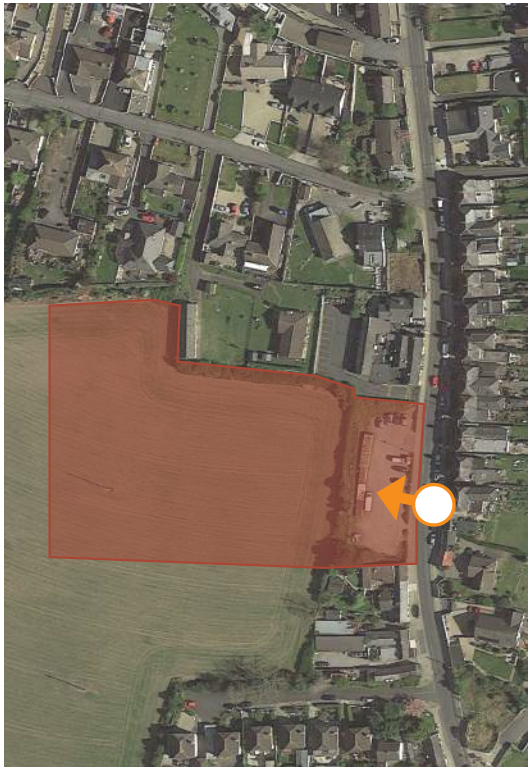
▲ Key Map



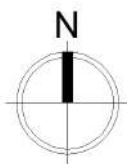
Section 4 - Proposed Images
CGI 03 - Proposed Access Road and Streetscape



▲ Proposed CGI 03 - Proposed Access Road and Streetscape



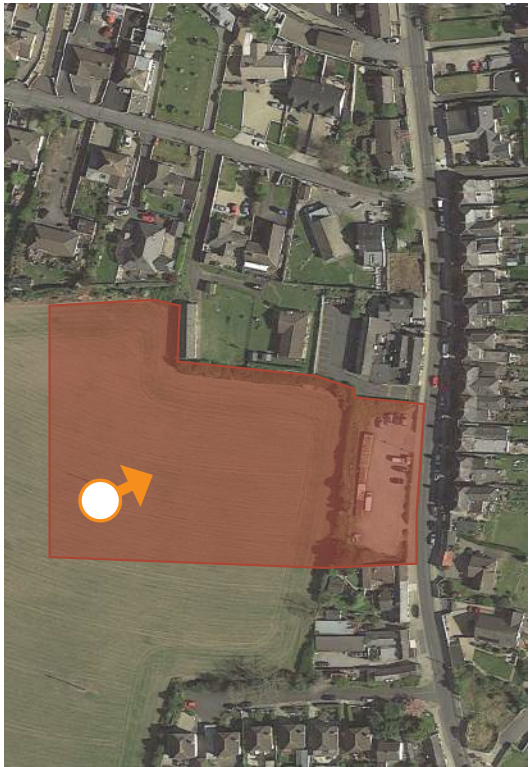
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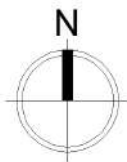
Section 4 - Proposed Images
CGI 04 - Proposed Lidl Store Entrance and Car Parking



▲ Proposed CGI 04 - Proposed Lidl Store Entrance and Car Parking



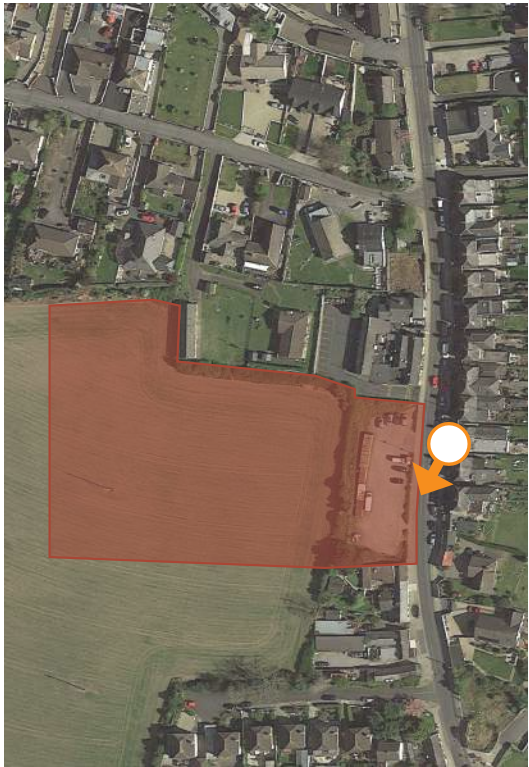
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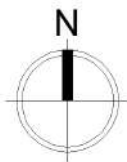
Section 4 - Proposed Images
CGI 05 - Proposed Streetscape



▲ Proposed CGI 04 - Proposed Lidl Store Entrance and Car Parking



▲ Key Map



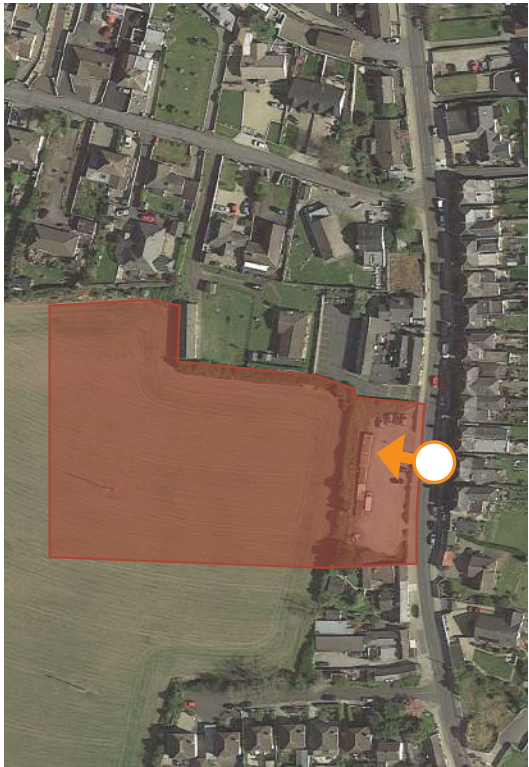
Appendix
Indicative Potential Masterplan



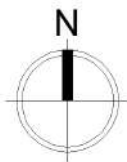
Appendix
Indicative Potential Masterplan



▲ Proposed CGI - Access road



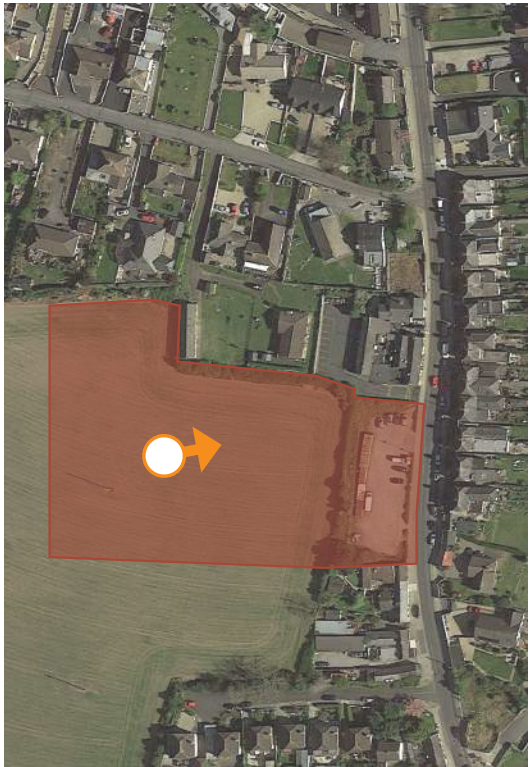
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Appendix
Indicative Potential Masterplan



▲ Proposed CGI - View from Adjacent lands



▲ Key Map

