

	<h1>Greystones-Delgany &amp; Kilcoole LPF Variation No.4</h1>
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<b>Who are you:</b>	Agent
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<b>Reference:</b>	GDKLPF-111806
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- Proposed Changes to Volume 2 of the Wicklow County Development Plan 2022-2028

## Local Planning Framework PART A Strategy

- A.2 County Development Plan strategy for Greystones – Delgany & Kilcoole

## Local Planning Framework PART B Settlement Specific Objectives.

- B.9 Specific local objectives (SLOs)

Please select which town you want to comment on:

Greystones/Delgany

**Observation relevant to the settlement:**

This submission also focuses on Objective GDK OP5 and the Tesco-operated Bellevue Road Neighbourhood Centre and includes a high-level retail needs assessment.

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Planning Consultants

# **Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028**

**Prepared by RMLA Limited**

On behalf of Tesco Ireland Limited

June 2025

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Status: Final

**For and on behalf of RMLA**

## Executive Summary

This submission, prepared by RMLA Ltd on behalf of Tesco Ireland Ltd., responds to the Draft Greystones–Delgany & Kilcoole Local Planning Framework (LPF) under Proposed Variation No. 4 to the Wicklow County Development Plan 2022–2028.

Tesco Ireland welcomes the opportunity to contribute to the public consultation process and supports the plan’s vision for compact growth, sustainable development, and encourages the strengthening of vibrant, accessible neighbourhood centres.

Through a high-level retail needs assessment, this submission highlights:

- A significant shortfall in convenience retail floorspace in Greystones relative to population growth;
- Ongoing retail leakage; with residents regularly shopping in neighbouring towns instead of locally;
- The unsustainability of requiring residents to travel for basic goods and services. There is an environmental benefit of enabling residents to access basic goods locally; and
- The critical importance of strengthening existing retail centres to meet consumer demand — particularly the Tesco-anchored Bellevue Road Neighbourhood Centre.

A detailed analysis of the catchment area indicates capacity for almost 20,000sqm (net) of additional convenience retail floorspace by 2028. Without targeted policy support, this deficit is likely to persist, resulting in continued leakage of local expenditure.

This submission also focuses on Objective GDK OP5 and the Tesco-operated Bellevue Road Neighbourhood Centre in southern Greystones. While the site is appropriately zoned as a Neighbourhood Centre, the draft LPF lacks sufficient policy support to enable its meaningful regeneration and expansion. We also respectfully challenge the LPF’s assertion that existing retail floorspace in the area is adequate.

Tesco proposes amendments to Objective GDK OP5 to support the redevelopment and enhancement of the Bellevue Neighbourhood Centre. Specifically, we recommend policy that:

- Explicitly supports the expansion and enhancement of the Bellevue Neighbourhood Centre, particularly the Tesco anchor;
- Enables the appropriate expansion and modernisation of existing retail floorspace in line with compact growth and sustainable development principles; and
- Recognises the role of the Bellevue Neighbourhood Centre in promoting sustainable travel through meeting local day-to-day shopping needs at source, particularly within the 10-15minute neighbourhood.

As a key stakeholder in the local retail economy, Tesco seeks a policy framework that facilitates sustainable investment in modern, accessible, and community-serving retail infrastructure within existing neighbourhood centres—consistent with the 10-15minute neighbourhood concept.

This proposal aligns with the National Planning Framework, the Retail Planning Guidelines (2012), and the settlement strategy set out in the County Development Plan. Strengthening the role of the Bellevue Neighbourhood Centre will help deliver more sustainable growth and improved local services across the plan area.

Tesco would welcome the opportunity to continue engaging with the planning authority to support the evolution of a vibrant and well-functioning neighbourhood centre at Bellevue.

## Introduction

This submission has been prepared by RMLA Limited on behalf of Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, Co. Dublin in response to the publication of the Proposed Variation No. 4 to the Wicklow County Development Plan 2022 – 2028 which relates to the draft Greystones – Delgany & Kilcoole Local Planning Framework (hereafter ‘Draft LPF’). Tesco, being one of the primary convenience retailers in Greystones, welcomes the opportunity to make a submission on the Draft LPF.

The retail sector plays a vital role in Wicklow’s economy, enhancing the vitality and viability of its towns and villages, specifically including Greystones-Delgany and Kilcoole while serving as a key economic anchor. It generates significant direct employment and supports a wide range of indirect economic and social activity. In this context, we welcome the opportunity to contribute to the preparation of the new LPF and encourage ongoing engagement between the Local Authority and stakeholders in the retail sector. Continued collaboration will help ensure that the Plan includes appropriate policies and objectives to attract new investment while also safeguarding the long-term viability and vibrancy of retail premises across Wicklow’s towns and villages.

Tesco welcomes the identification of the Bellevue Road Neighbourhood Centre as an Opportunity Site in recognition of the important contribution retail makes to the local community. However, we question the statement “*retail and commercial floor space is already adequate for this location*”. This submission will demonstrate:

- There is a need for significantly more convenience led floorspace than currently exists;
- There is significant retail leakage from the catchment; with many residents shopping outside of the catchment; and,
- The importance of convenience led shopping needs being met locally to reduce unsustainable travel patterns and support compact growth.

With no new retail sites proposed, existing retail locations are vital to serving Greystones existing and future populations. This is a key consideration for the new LPF, particularly in terms of serving the large and increasing population of Greystones, providing employment, contributing to place-making and attracting additional investment.

We respectfully request that Wicklow County Council develop and implement policies that:

- Support the sustainability of existing retail stores; and,
- Facilitate the development of new, appropriately scaled retail facilities in suitable locations - aligned with projected population growth.

In this regard, it is requested that Objectives GDK OP5 is amended to support the redevelopment of the site. This would accommodate large scale convenience retailing and ancillary retail services in

recognition of the function of a Neighbourhood Centre, which is to provide a range of convenient and easily accessible retail outlets and services within walking distance for the local catchment population.

This submission specifically requests that Objective GDK OP5 be amended to reflect the retail needs of the growing population and to enable the sustainable redevelopment of Bellevue Road Neighbourhood Centre.

## Background

Tesco Ireland Limited (hereafter 'Tesco') is one of Ireland's leading convenience retailers, operating 183 no. stores across cities and towns nationwide, including five stores across the County, these are Arklow, Bray, Greystones, Kilcoole and Wicklow. The Tesco business model encompasses traditional 'bricks and mortar' stores which includes grocery, F&F clothing, Tesco mobile, electronics and more, Grocery Home Shopping, and Click+Collect services, all supported by an integrated distribution network. Tesco's continued investment in its retail network plays a critical role in supporting employment, economic activity and community initiatives across Ireland. With over 13,500 colleagues employed directly and an estimated 45,000 jobs supported both directly and indirectly nationwide.

Tesco is the single largest retail purchaser of Irish food and drink in the world, sourcing €1.6 billion worth of produce annually and supporting almost 13,000 farming families in every county. In recognition of this, Tesco was named by suppliers as the number one retailer to do business with, in Ireland in the Independent Advantage Survey.

As the needs of Irish families evolve, so too must the way they are served. Across the Tesco network, Tesco have seen a sustained and growing demand for home delivery and click-and-collect services, particularly among busy working households. The largest and most frequent users of weekly grocery delivery are:

- Families with babies or pre-school children, where convenience and time savings are essential.
- Followed closely by families with school-age children, who are managing work, school runs, and after-school commitments.

For these groups, reliable access to online grocery services is a critical service that helps them manage household logistics. To serve them effectively, Tesco have evolved their offering, store layout and operations. This means retaining and protecting a small but essential portion of back-of-house and car park space within stores to facilitate home delivery and collection services.

Tesco's investment in an area extends past the store to the wider community. The Tesco Community contributes to the vibrancy and prosperity of the communities, by donating up to €1,500 to three local causes quarterly. Since it launched in 2024, the Community Fund has donated €300,000 to local causes



in Wicklow. The Tesco outreach focuses on supporting children through 2 programmes - Tesco Stronger Starts Food and Tesco Stronger Starts Cooks.

### **Tesco Stronger Starts Food**

This programme supports students in 290 DEIS primary schools nationally by providing free fresh food packs of fruit and vegetables to support families to create healthy meals at home, for every week of the school term. In Wicklow Tesco support:

- 6 Wicklow DEIS schools are supported by the Stronger Starts programme;
- 120 packs of fresh food are delivered to these schools weekly; this is the equivalent of 970 meals for families in need.

### **Stronger Starts Cooks**

This is a free six-week programme which has been delivered to almost 3,000 primary school pupils across 42 primary schools this year. It includes hands cooking workshops and lessons in food science, food safety and healthy eating. Among the highlights is a visit to a local Tesco store, where students explore the journey of food from farm to shelf. St. John's Senior National school in Wicklow took part in this programme with 90 students undertaking the programme.

### **Meeting Future Needs**

Given recent and projected population growth and the relatively limited expansion of retail floorspace over the past c.15 years, there is clear potential to deliver additional stores at appropriate locations. This would support Wicklow's growing population and enable the enhancement and expansion of existing retail facilities.

Wicklow County Council (Reg. Ref. No. 08/1057) previously granted planning permission to Tesco Ireland Limited for the redevelopment of the Bellevue Road Neighbourhood Centre site to allow a two-storey replacement retail facility with under croft car parking, accommodating a food store, retail/commercial units, a dentist surgery and staff areas. In addition, road improvements, a signalised junction and pedestrian crossing upgrades were approved. An Extension of Duration for a period of 5 years was granted in March 2015 (Reg. Ref. 15109), however due to economic conditions at the time, it was not possible to deliver the proposed development, and this permission expired in May 2020.

Tesco remain fully committed to investment in Wicklow and to providing the best possible service to its customers and in this regard intend to redevelop the Tesco Bellevue Road store. The provision of a larger format store has the advantage of offering a greater product range while also providing Grocery Home Shopping hubs and Click and Collect facilities. A modern store with supporting retail services provides customers with a range of shopping channels while also supporting the 10-minute compact concept, promoting sustainable modes of transport through the provision of electric vehicle charge points and dedicated cycle parking.

## Planning and Vision

In accordance with the Planning and Development Act 2000 (as amended) (hereafter ‘the Act’), Development Plans are required to include policies and objectives for the management of retail development within a County and its constituent settlements. The Act also stipulates that Development Plans must align with any guidelines issued under Section 28, notably the *Retail Planning Guidelines* (2012). These national guidelines apply uniformly to all Local Authorities and aim to ensure that each County and settlement provides an appropriate quantum of retail floorspace within its administrative area, thereby minimising retail leakage to other Counties/settlements. Retail leakage can indicate either the influence of a significantly higher-order centre where a broader range of goods, services and facilities are offered compared to local areas or an insufficient allocation of retail floorspace in a given settlement or County. Where leakage occurs, a review of retail provision should be undertaken to address any imbalances.

In this regard, it is noted that the Retail Development Strategy as contained in the Draft LPF recognises that retail leakage exists and it is an objective to *“Facilitate an appropriate expansion of retail floorspace to reduce leakage of expenditure from both the town / village itself and the wider County.”*<sup>1</sup>.

In the absence of any published retail floorspace figures, we have undertaken a high-level comparative analysis of a number of settlements within Wicklow which confirms that these areas are currently underserved by convenience retail floorspace. (Refer to Retail Need Assessment on pg. 11 of this submission). It is clear that a proportion of local retail trade is being diverted to larger, neighbouring settlements, such as South Dublin (e.g. Cornelscourt). Furthermore, given the projected County population growth to 2031, there is a clear opportunity to facilitate additional convenience retail provision to better meet future demand and enhance the sustainability of local communities.

As no new neighbourhood centres have been designated in the LPF for Greystones, there is a need to support the redevelopment of existing neighbourhood centres and existing retail facilities that play a vital role in serving their local communities. The new LPF should explicitly recognise their contribution by including supportive retail led policies. This will help safeguard their continued viability and ensure they can adequately meet the needs of growing catchment populations.

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<sup>1</sup> Greystones-Delany and Kilcoole Draft Local Planning Framework 2025-2031; pg. 6

## Strategic Narrative – Retail Development

In the 2022 census, Greystones-Delgany had a population of 22,009, making it the second largest town in the County, after Bray. The town experienced significant growth between 2016 and 2022 and has already exceeded the Core Strategy target population for 2031 (22,081). Continued population growth increases demand for services including housing, education, community and retail. The Draft LPF states that in order to ensure additional increase in housing/population targets during the lifetime of the LPF that additional zoned serviced/serviceable residential lands are provided, however the same is not provided for supporting services such as retail.

Greystones-Delany is identified as a ‘Self-Sustaining Growth Town’ (Level 3) in the County settlement hierarchy, with the Draft LPF acknowledging the significant growth that has already occurred:

*While the ‘growth town’ designation would suggest that significant new population growth is planned for Greystones – Delgany for the duration of the County Development Plan, in fact this designation is intended to **reflect the growth that has already occurred in the 2016-2025 period having regard to housing development completed, underway and due for completion within this timeframe. The focus during the period of this LPF therefore will be on the provision of ‘catch up’ infrastructure to match this significant residential growth and with respect to further residential development, will be on infill development and consolidation of the built up area.***

*The town should aim to attract a concentration of major employment generating investment and should target investment from foreign and local sources in a mixture of ‘people’ and ‘product’ intensive industries. In addition, **the town should provide for the retail needs of its population and its catchment, in the form of a mixture of both comparison and convenience retail offer.*** (RMLA emphasis added).<sup>2</sup>

Despite significant population growth in Greystones over the past 15 years, the delivery of new retail floorspace, particularly convenience led retail floorspace has been limited. The Draft LPF acknowledges the issue of retail leakage; however, it also paradoxically proposes a reduction in lands zoned as ‘Neighbourhood Centre’ compared to the Greystones–Delgany and Kilcoole Local Area Plan 2013–2019 (omission of previous Neighbourhood Centre zoned lands at Mill Road). This risks further undermining local retail provision at a time when the need and demand is growing.

In particular, the site-specific objectives for the Bellevue and Blacklion Neighbourhood Centres prioritise mixed-use redevelopment over the consolidation and strengthening of retail-led neighbourhood centres.

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<sup>2</sup> Greystones-Delany and Kilcoole Draft Local Planning Framework 2025-2031; pg. 4

This shift in emphasis risks undermining the ability of these centres to meet the day-to-day convenience shopping needs of the growing local population including full-line grocery stores.

It is essential that retail-related zonings—especially those anchored by supermarkets and serving as neighbourhood centres—continue to be guided by established planning principles. These include:

- maintaining competitiveness in the retail sector,
- protecting existing employment,
- facilitating the creation of new jobs, and
- preserving the vibrancy, commercial and social function of town and neighbourhood centres.

A move away from dedicated neighbourhood centre zoning toward predominantly residential mixed-use development compromises these objectives. Limiting their retail function through diluted objectives not only weakens the long-term viability of existing businesses but also constrains the future potential for retail growth, investment, and service provision. Neighbourhood centres serve as critical infrastructure—providing essential retail services, local employment, and community focal points.

While the Draft LPF emphasises the role of town centres in accommodating medium- and smaller-scale retail development, it is important to acknowledge the practical limitations of such locations. Many town centres are constrained by small and fragmented land parcels, limited parking and delivery access, and a compact built form—all of which can significantly inhibit the delivery of modern, purpose-built retail formats, particularly those requiring larger floorplates.

In this context, neighbourhood centres such as Bellevue, play a necessary role in complementing the town centre offer. These sites are strategically located, accessible and capable of delivering fit-for-purpose retail floorspace that can adapt to evolving retail trends and consumer needs.

Tesco believes the draft site-specific objectives for lands under its ownership should be reconsidered to reflect their full potential in supporting sustainable economic development, delivering essential local services, and enabling the creation of modern, efficient, and accessible retail spaces within Greystones.

As a long-established leader in the convenience retail sector, Tesco is well positioned to respond to the community's growing needs—both over the lifetime of the LPF and beyond. The delivery of increased high quality convenience retail development can significantly enhance the vitality and viability of town and neighbourhood centres by:

- supporting physical regeneration,
- redeveloping underutilised sites,
- contributing to compact urban growth, and
- enhancing the overall quality and attractiveness of the urban environment.

The economic and social benefits of convenience retailing are closely linked. Tesco is not only a major employer but also a key contributor to local economies. Its stores act as an anchor in towns and cities, driving footfall and supporting surrounding businesses.

To ensure Greystones can sustainably meet the demands of its expanding population and address the acknowledged issue of retail leakage, retail-related zoning must remain grounded in sound planning principles. It must prioritise the delivery of high-quality, accessible retail infrastructure—particularly within existing neighbourhood centres—and resist policy shifts that undermine their essential role in the local economy and community life.

## Retail Need Assessment

While the Draft LPF acknowledges retail leakage and suggest a need for additional floorspace, it also states that the two main neighbourhood centres in Greystones (Bellevue and Blacklion) are already adequately served by retail floorspace. These messages do not seem align. To better understand the issues identified within the Draft LPF we have undertaken a high-level retail needs assessment for Greystones and the adjoining centres of Bray and Wicklow. This assessment focuses on the primary catchment areas to gain a clearer understanding of the actual convenience-led shopping needs of local residents.

The Retail Planning Guidelines for Planning Authorities, 2012, set out the main steps required to complete a retail assessment. In addition to qualitative assessment, the Guidelines provides guidance on the approach to determine, broadly, the quantum of additional floorspace required for a particular area. The following 3 steps are commonly accepted in the quantitative assessment:

- Assess the level of existing retail floorspace;
- Determine future demand; and
- Carry out projections of needs for additional retail floorspace.

The Retail Planning Guidelines requires new retail floorspace be considered in the context the on the vitality and viability of an existing centre and *inter alia*:

- The long-term strategy for city/town centres;
- Potential to increase employment opportunities and promote economic regeneration;
- Potential to increase competition within the area and thereby attract further consumers to the area;
- Consumer demand and not to diminish the range of activities and services that an urban centre can support;
- Impact on one or more city/town centres, either singly or cumulatively;
- The number of vacant properties in the primary retail area;
- Access by public transport, foot and private car; and,
- Linkage with an existing city/town centre so that there is likely to be commercial synergy.

The Guidelines recognise that it is not the purpose of the planning system to inhibit competition, preserve existing commercial interests or prevent innovation. Rather, they seek to respond to the current and predicted economic, demographic and social circumstances by facilitating a healthy environment for retail industry and encouraging competition and innovation.

This Retail Need Assessment identifies a clear need for modern convenience an associated lower order comparison floorspace. The following assessment considers the retail need in the years 2025 and 2028 and adherence to the Retail Planning Guidelines 2012.

### Identification of the Study Area & Catchments

In order to accurately assess the retail environment, it is necessary to establish a realistic and accurate Study Area (see Figure 1) with catchments which reflect the majority of trade draw for the centres of Bray, Greystones and Wicklow, and consider same in the context of the assessment years of 2025 and 2028.

The physical extent of the Study Area is used to determine the capacity of existing centres and their catchment expenditure. The Study Area and primary catchments for each centre were constructed having specific regard to the gravity model. This model allows for the identification of an accurate catchment area through the combination of both drive times from the site and the probability of residents conducting shopping in an area.



Figure 1: Study Area and Catchments

The retail draw of supermarkets differs significantly from that of higher-order comparison retail or retail warehousing. This distinction stems from the hybrid nature of supermarkets, which are designed to support convenient, routine shopping trips through their format and product range. Once a new supermarket establishes a regular trade pattern, consumers tend to use it for their essential weekly shopping, primarily driven by factors such as location, ease of access, and competitive pricing on convenience goods. While supermarkets may carry some comparison goods, these are generally purchased in a convenience context, where purchasing decisions are typically based on price rather than the qualitative or design-based comparisons associated with traditional comparison shopping.

The catchment populations are based on the 2022 census and projected forward using the growth rates set out in the “Implementation Roadmap for the National Planning Framework 2018”. The resultant populations are set out in Table 1 for the years 2025 and 2028.

Centre	2025	2028
<b>Greystones</b>	42,975	44,115
<b>Bray</b>	41,261	42,356
<b>Wicklow</b>	33,742	34,637

**Table 2: Catchment Population**

### Existing Retail Environment

Table 2 outlines the existing retail environment in respect of convenience and comparison (excluding retail warehousing which has also been excluded from the calculation of available expenditure) floorspace across the catchment and the figures are based on the existing retail floor areas taken from planning permissions, retail impact assessments, and published figures. There has been limited new convenience and comparison retail floorspace over the last 15 years which is not unexpected considering the economic environment and challenges faced by the retail sector over that period. The pipeline floorspace (i.e. retail developments with extant planning permissions) follows a similar trend with limited potential new floorspace identified.

Centre	Net Convenience (m <sup>2</sup> )	Net Comparison (m <sup>2</sup> )
<b>Greystones<sup>3</sup></b>	7,500	5,000
<b>Bray<sup>4</sup></b>	11,911	23,000
<b>Wicklow<sup>5</sup></b>	4,860	10,500

**Table 2: Existing Convenience and Non-Bulky Comparison Floorspace 2025**

<sup>3</sup> Floorspace Assumptions for Greystones based on best available information, GDA Retail Strategy, previous Retail Impact Statements and/or estimates based on a visual assessment

<sup>4</sup> Floorspace Assumptions for Bray (Convenience) on best available information GDA Retail Strategy plus Lidl and Petitt's Supervalu; Bray (Comparison) on best available information, GDA Retail Strategy, previous Retail Impact Statements plus the Florentine Centre.

<sup>5</sup> Floorspace Assumptions for Wicklow (Convenience) on best available information, GDA Retail Strategy, previous Retail Impact Statements plus Aldi; Wicklow (Comparison) on best available information, GDA Retail Strategy and previous Retail Impact Statements.



### Extant Planning Permissions

In estimating the level of capacity for the subject proposal, cognisance was given to extant planning permissions that may be implemented by 2028. In this regard, there are no significant extant planning permissions in the catchment or study area (as such there is no change to Table 2 for the 2028 scenario).

### Capacity and Impact Assessment

Capacity and impact assessments based on available expenditure within the identified catchments have been undertaken having regard to best practice as established by the Retail Planning Guidelines 2012, while also taking account of:

- New retail outlets that are planned in the form of extant planning permissions;
- Exclusion of retail warehousing, wholesale retail and car sales outlets;
- The current and recent economic circumstances which affect the level of available expenditure, particularly in respect of comparison products; and
- Levels of internet sales associated with comparison products.

### Expenditure and Turnover Estimates

Understanding future retail space requirements begins with assessing current retail expenditure in the area. In order to calculate the available expenditure within the Study Area and individual catchments and evaluate the level of impact it is necessary to establish both per capita expenditure and turnover (sales density) estimates for the assessment years of 2025 and 2028.

Table 3 indicates the relevant per capita expenditure figures for County Wicklow utilised in this assessment for convenience and comparison floorspace. The Per Capita expenditure figures are based on the Annual Services Enquiry (ASI) 2021 which is considered to be the only reliable source from which to establish expenditure. The figures were then adjusted to reflect changes in expenditure levels between 2021 and the base year (i.e. 2025). The comparison figures exclude retail warehousing expenditure and are further reduced to acknowledge internet sales. As a result, the figures set out below are considered to be realistic Per Capita expenditure levels which take account of current and future reductions in the levels of available expenditure.

County Wicklow	2025	2028
Convenience Floorspace	€5,549.10	€5,717.24
Comparison Floorspace	€5,227.05	€5,423.75

**Table 3: Per Capita Expenditure Figures**

It is apparent that the comparison Per Capita expenditure will be most affected by economic fluctuations as this form of expenditure relates to a significant amount of non-essential products. In contrast, the level of convenience per capita expenditure is relatively inelastic, even during economic downturns, due

to the essential nature of the product range. In addition, the expenditure levels associated with the low order comparison ranges (such as that in a supermarket) is comparable to the convenience element in terms of its inelasticity.

Turnover ratios for County Wicklow (see Table 4) were established based on industry norms for both convenience and non-bulky comparison floorspace. As turnover can vary depending on, inter alia, the size, quality, location, age and layout of retail units, an average turnover was taken for the existing floorspace. The turnover ratios used were projected using an efficiency of 0.5% for convenience and 1.0% for non-bulky comparison.

County Wicklow	2025	2028
Convenience Floorspace (+.5%)	€9,000	€9,181
Comparison Floorspace (+1%)	€5,333	€5,550

**Table 4: Convenience and Comparison Turnover Estimates per sqm (€)**

### **Catchment Expenditure**

By applying the population projections outlined to the per capita expenditure for the area it is possible to estimate the available expenditure in the Study Area and individual catchment areas for the base year 2025 and the future assessment year of 2028. The tables overleaf provide both the available expenditure and the equivalent floorspace.

Convenience Floorspace	Greystones		Bray		Wicklow	
Years	2025	2028	2025	2028	2025	2028
Population	42,975	44,115	41,261	42,356	33,742	34,637
Available Expenditure (€)	238,471,288	252,215,382	228,963,547	242,159,671	187,238,149	198,029,464
Floorspace Turnover (€)	67,500,000	68,857,500	107,199,000	109,354,891	43,740,000	44,619,660
Total Surplus/Deficit Available Expenditure (€)	170,971,288	183,357,882	121,764,547	132,804,780	143,498,149	153,409,804
Floorspace Capacity/Headroom (sqm)	18,997	19,971	13,529	14,465	15,944	16,709

Table 5: Available Expenditure Summary – Convenience Floorspace

Comparison Floorspace	Greystones		Bray		Wicklow	
Years	2025	2028	2025	2028	2025	2028
Population	42,975	44,115	41,261	42,356	33,742	34,637
Available Expenditure (€)	224,631,264	239,268,193	215,675,319	229,728,680	176,371,514	187,863,847
Floorspace Turnover (€)	26,665,000	27,750,000	122,659,000	127,650,000	55,996,500	58,275,000
Total Surplus/Deficit Available Expenditure (€)	197,966,264	211,518,193	93,016,319	102,078,680	120,375,014	129,588,847
Floorspace Capacity/Headroom (sqm)	37,121	38,111	17,442	18,393	22,572	23,349

Table 6: Available Expenditure Summary – Comparison Floorspace

The calculation of available expenditure provides an estimate of the total convenience expenditure of residents living within the catchments under the present population growth scenario. However, considering the level of housing delivery anticipated in the catchment, the population may exceed that projection and therefore an even greater need may exist in the coming years.

From the headroom analysis provided above along with available expenditure share it is apparent that there is significant capacity in each of the settlements of Greystones, Bray and Wicklow and that there is a need for significantly more convenience floorspace to serve the settlements and to address the current levels of leakage and overtrading. If this retail shortfall is not addressed through appropriate zoning and policy objectives, the LPF may fall short in meeting its core obligations under the Act and Section 28 Guidelines. In this regard, it is important that convenience shopping needs are met at the source of demand to avoid unsustainable travel patterns of consumers travelling out of the area, to carry out their weekly shop due to a lack of choice/modern facilities locally.

Demand for convenience goods tends to come from the localised catchment, as these are the types of goods that people require more readily, and for which people are less willing to travel significant distances to purchase. In contrast, comparison goods outlets have wider catchment areas, as people are willing to travel further distances to purchase such goods and can use modes of public transport to buy such goods.

The existing centres of Greystones, Bray and Wicklow are sufficiently dispersed throughout the catchment with no significant overlay of their primary catchments. Likewise, in terms of the existing supermarket operators, the dispersed nature throughout each of the study areas of such floorspace/ designated retail lands mean that any retail expansion/refurbishments should not be viewed in terms of impact but rather providing consumer choice.

### **Retail Need Assessment Conclusion**

- The above assessment clearly indicates that the convenience retail provision within the Greystones catchment requires additional floorspace and that qualitative improvements in terms of modern floorspace is necessary. The new LPF should promote and encourage qualitative improvements such as modern and efficient retail floorspace offering a wider range of choice of household goods and competitive prices.
- It has been demonstrated that the Greystones Catchment can accommodate significantly more floorspace without resulting in negative impacts on nearby centres.
- Additional floorspace is required to address current levels of leakage and overtrading.

From the retail need analysis provided above through the identification of appropriate primary catchments and available expenditure therein, it is apparent that there is a significant need for additional retail floorspace. In this regard, it is clear that changes in *inter alia* zoning, retail policy and hierarchy

are required to combat the existing shortfall. If the issue is not addressed, it will lead to continued retail leakage, more unsustainable patterns of development, and forcing people into cars to travel to centres further away. This would be contrary to the principles of the 10-15minute neighbourhood where essential services are provided at the source demand. Therefore, we would respectfully suggest that the Neighbourhood Centre lands at Bellevue are identified as the appropriate location to accommodate a large floorplate modern supermarket, of a scale commensurate with that identified in the analysis carried out as part of this submission.

## Bellevue Neighbourhood Centre

The Tesco store and supporting shops at Bellevue Road, have a long-established retail role providing for the main food shopping and day to day needs of the area. The Bellevue Centre has a symbiotic relationship with the Town Centre which has a strong provision of boutiques, cafes and restaurants. In this regard, the Bellevue Road Neighbourhood Centre complements, rather than competes with, the town centre offer by focusing on main food shopping, while the town centre specialises in comparison retail and social destinations.

The existing Tesco supermarket is overtrading, mainly attributed to the lack of convenience offer in the town relative to its population. Tesco agree with the description of the Bellevue Neighbourhood Centre in the Draft Plan, in so far as, it recognises the underutilisation of the site:

*“There is potential to reconfigure the lands so that the retail building footprint and the proportion of the site devoted to surface car parking are reduced, and the site put to better, more intensive use, and create a stronger identity and streetscape at this node.”<sup>6</sup>*

However, it is requested that the site-specific objectives for the Bellevue Neighbourhood Centre are amended in recognition of the under provision and outdated convenience floorspace within the catchment and the need to encourage investment in this sector. In this regard, the following Objectives are considered appropriate:

### Suggested Objectives GDK OP5

- *To support the expansion and enhancement of the existing convenience anchor at Bellevue Neighbourhood Centre subject to demonstrating capacity for additional retail floorspace.*
- *New development shall be of a high architectural design, sensitively integrating with the surrounding context and contributing positively to the public realm.*
- *Development proposals must seek to retain, as much as possible, the mature trees in this area.*
- *New development shall promote sustainable travel through the provision of cycle facilities, EV charging and integration with pedestrian networks.*

<sup>6</sup> Greystones-Delany and Kilcoole Draft Local Planning Framework 2025-2031; pg. 51

## Conclusion

Tesco welcomes the preparation of the new Local Planning Framework for Greystones–Delgany & Kilcoole and appreciates the opportunity to provide input. As a key convenience retailer in Greystones, Tesco is committed to supporting sustainable community growth by continuing to invest in high-quality retail facilities.

The submission clearly demonstrates that:

- There is a **significant shortfall in convenience (and comparison) retail floorspace** in Greystones;
- The **Tesco Bellevue Road store is overtrading**, indicating demand exceeds supply;
- The town's population already **exceeds its 2031 target**, and further growth is anticipated;
- **Retail leakage and car-based travel to centres outside of the Greystones catchment will worsen** without appropriate local provision.

To address these issues and to align with national and local planning policy objectives—such as compact growth, walkable communities, and employment generation—it is **essential** that the LPF:

- **Recognises the retail need** in the area;
- **Supports the expansion and enhancement** of existing centres such as Bellevue, particularly the anchor retailers;
- **Incorporates specific objectives** that enable appropriately scaled convenience led retail development.

Failure to address the retail shortfall within this LPF risks the continuation of unsustainable travel patterns and retail leakage for years to come.

Tesco respectfully requests that the Draft LPF be amended accordingly. We are available to discuss these matters further and would appreciate confirmation of receipt of this submission.

# RMLA.

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