

Submission on behalf of Value Retail Dublin Ltd.

Kildare County Development Plan 2023-2029

Draft Stage

May 2022

Contents

1. Introduction3

2. Submission.....5

3. Conclusion.....12

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For and on behalf of Avison Young Planning and Regeneration Limited

1. Introduction

- 1.1 We, Avison Young, have prepared this submission on behalf of our client, Value Retail Dublin Ltd. ("Value Retail"), 1B Kildare Village, Nurney Road, Kildare Town, Co. Kildare in response to the publication of the Draft Kildare County Development Plan 2023-2029.
- 1.2 Value Retail continues to be the owner and operator of the Kildare Tourist Outlet Village (hereafter referred to as the "KTOV") in Kildare Town, which it opened in 2006. The KTOV forms part of the Bicester Collection with comprises 11 no. luxury retail tourist destinations across Europe and Asia, with a new destination Belmont Park Village, New York, opening in the near future.
- 1.3 The KTOV plays a significant role in the retail, economic and tourism profile of County Kildare. Value Retail's most recent commitment to the KTOV and the County, with the opening of Phase 3 made during the pandemic, delivered 29 new shops and 2 restaurants. This investment creates up to 380 new jobs, introduces new international retailers to Ireland and supports the growth of Irish retail businesses. During its 15+ years of ownership, Value Retail has continuously evolved its offer at the KTOV to meet the changing needs of its guests and to curate a unique retail led experience destination.
- 1.4 In this context, our client welcomes the opportunity to make a submission on the preparation of the new Development Plan for County Kildare which will provide the basis for the sustainable development of the County over the plan period, in line with the objectives of the National Planning Framework (hereafter, the NPF) and the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly (hereafter, the RSES).
- 1.5 The County Development Plan will provide the general policy framework for County Kildare to facilitate economic growth and evolution of its retailing and tourism sectors, which will be important particularly in response to the COVID-19 pandemic and growth of online retail. In this regard, the new County Development Plan should include sufficient policy support for the continued successful operation, enhancement and evolution of the KTOV. The KTOV has an important role in the County's economy and in successfully contributing to the evolution of an innovative retail and tourism offer in the County as part of its wider post-pandemic recovery plan.
- 1.6 This submission requests that Kildare County Council consider the following during the finalisation of the Draft Kildare County Development Plan:
 - The recognised role the KTOV plays for the County's economy in relation to retail and tourism, and particularly as part of the post pandemic recovery, should continue to be supported through

specific policies within the new Development Plan for Kildare County, as well as providing greater recognition of the KTOV by name.

- Kildare County Council must ensure the continued expansion and evolution of the retail offer and supporting services and infrastructure in the County, with a framework of policies which enable existing retailers to innovatively adapt to constantly changing market trends and the global retail environment (specifically the growth of commoditised digital retail) in order to maintain the competitiveness and attraction of Kildare as a retail and tourism destination.
- Kildare County Council should develop policies to support the role the KTOV plays, within the wider Bicester Collection, in attracting new international retail brands to open in Ireland and support the development of local Irish brands. This includes:
 - ensuring policies are capable of adapting to the changing nature of the retail market and consumer behaviour in the wake of COVID-19 and Brexit, as well as the evolution of 'outlet centres' within the global retail environment; and
 - enabling Value Retail to develop a range of services and to curate a physical environment to ensure the KTOV can continue to sustain and improve its retail profile and competitiveness within the Greater Dublin Area's retail economy and beyond.
- Kildare County Council should continue to support the KTOV as a tourist centre (which attracts over 4 million visitors annually) and should enable the KTOV to continuously evolve its retail offer and associated services in order to retain these high visitor numbers.

1.7 We would request that the Local Authority carefully consider this submission in the preparation of the Draft Development Plan for Kildare County and accommodate future engagement with Value Retail Dublin Ltd.

2. Submission

- 2.1 The following section outlines the comments being made in relation to the Draft Kildare County Development Plan 2023-2029.

The Kildare Tourist Outlet Village (KTOV)

- 2.2 In the first instance, the important role that the KTOV plays in Kildare Town and the wider County should be acknowledged. The KTOV, located to the southwest of Kildare Town and to the north of the Nurney Interchange (Junction 13) of the M7 Dublin to Limerick Motorway, first opened in 2006 and has come to be recognised as the leading designer outlet centre in Ireland.
- 2.3 The KTOV is the only retail outlet of its kind within the Republic of Ireland at present and is one of 11 luxury shopping destinations established by Value Retail across Europe and Asia, with a 12th Village expected to open in New York in the near future. Expanded over three phases of development, with Phase 3 recently opening, the KTOV provides over 24,000 sq.m of commercial floorspace, with c. 130 brands in operation from the world's most exciting designers including Prada, Louise Kennedy, Armani, Mulberry and many more.
- 2.4 The KTOV has been a strategic benefit to the Irish retail market and has acted as a starting 'bricks-and-mortar' location for a number of retailers who have entered the Irish market via the KTOV, such as The White Company. Many of these retailers who had their first presence in the Irish market within the KTOV have gone on to establish themselves elsewhere within the Irish market. This highlights the draw that the KTOV has for luxury brands entering the Irish market and the wider impact that can result.
- 2.5 The KTOV, across the Management/Security/Services staff and brand staff in the shops, currently employs approx. 1,000 people and expects to employ approx. 1,350 people once Phase 3 is fully occupied. Additionally, the KTOV currently attracts over 4 million visitors a year, and this is expected to grow exponentially with the opening of Phase 3.
- 2.6 As such, the KTOV can be recognised as an economic driver, not only within Kildare County but also nationwide. It is a destination that offers more than just shopping and encourages those visiting the Village to experience the rest of Kildare Town and its wider hinterland. Therefore, this effect of attracting people from the wider region helps to drive growth, create employment and maximise potential.
- 2.7 In summary, the KTOV delivers the following benefits to County Kildare and Kildare Town in relation to the economy, job creation and tourism:

- ***Over 24,000 sq.m of commercial floorspace.***
- ***Approx. 1,350 people employed.***
- ***Over 4 million visitors annually.***

Adapting to the Changing Nature of Retail

- 2.8 There are a number of current and emerging trends and initiatives in the retail sector which may affect the retail environment. As the retail market is constantly evolving and with the emergence of increased levels of e-commerce, as well as the COVID-19 pandemic and Brexit impacting consumer behaviour, it is more important than ever to protect the evolution of the future retail offer within the County.
- 2.9 The retailing sector contributes significantly to employment in the County, whilst also enabling access to goods and services, and as such, it will be very important, in a post-COVID-19 and post Brexit environment, that this sector can expand and that existing retailers in the County are fully supported by Kildare County Council in the enhancement of the County's retail offer.
- 2.10 In addition to the changing trends of online retailing and 'bricks-and-mortar' retailing, the concept of placemaking is being recognised as crucial for retailing going forward. It is considered that the viability of retail stores in the future will be heavily reliant on being located in quality urban settings with an experience which attracts consumers; a destination as an antidote to commoditised e-commerce. Furthermore, another key trend emerging in recent times is that of digitally native, direct-to-consumer brands who started online, now moving towards offline spaces to create a physical presence for consumers to shop. A lot of these brands have a focus on apparel due to the need to see/try the product and interact/avail of advice from a sales assistant.
- 2.11 As such, to keep in line with current trends and the ever-changing global retail changing market, Value Retail's business model has also adapted and changed over the last 15+ years, since the KTOV first opened. As a global retailer with Centres across Europe, Asia and soon the USA, the function of an 'outlet centre' has adapted to reflect the changing global retail environment. For example, (i) the approach to regular discounting of product in full price retail has significantly blurred the lines between full price and outlet; (ii) the concept of 'seasons' within the retail environment has lost its relevancy with a wide variety of products, which are seasonless, (iii) the types/range of products and the brands being sought by consumers at outlet centres has shifted particularly in the high end outlet retail Villages operated within the Bicester Collection. As such, the definition of an 'outlet centre' must adapt to align with merging markets and online retailing trends.

- 2.12 To maintain the attractiveness and differentiation of the KTOV, guests now expect a wide range of services to support the traditional retail offer; these include personal shopper services, hands free shopping and virtual personal shopping. These services were not in existence before the pandemic and are evidence of the way Value Retail innovates to respond to changing guest needs, which will no doubt continue to evolve during the period of next County Development Plan.
- 2.13 Therefore, it is considered that Kildare County Council must ensure the continued expansion and evolution of the retail offer in the County, and to enable existing retailers to innovatively adapt to these constantly changing market trends, in order to maintain the competitiveness and attraction of Kildare as a retail destination.

The Draft Kildare County Development Plan 2023-2029

- 2.14 The Draft Kildare County Development Plan 2023-2029 (the 'Draft Development Plan') states that the KTOV has a regional, national and international retail profile. Furthermore, the Draft Development Plan outlines that the retail sector is critical to the future economic success of the County and that Kildare must continue to sustain and improve its retail profile and competitiveness within the Greater Dublin Area's retail economy and beyond.
- 2.15 The Draft Development Plan seeks to ensure that the County sustains and enhances its attraction and competitiveness as a retail destination and that it must be proactive and responsive in respect of innovation in retailing and new retail market trends. It is submitted that the ability to provide for, and be responsive to, innovative retail trends will be a significant and important element for the future of the County in ensuring that Kildare sustains and enhances its attraction and competitiveness as a retail destination. The success of the KTOV and its role in raising the retail profile of the County in regional and national shopping patterns, as well as in introducing an international dimension to its shopper attraction has been previously highlighted as a beneficial innovative retailing format (Section 9.5.12 of the Current Kildare County Development Plan 2017-2023). It is requested that the KTOV's role as bringing an international and innovative retailing format to the County is recognised in the new Development Plan for Kildare.
- 2.16 Furthermore, a number of areas considered to be of strategic tourism potential in the County are outlined in the Draft Development Plan and the KTOV is included as a recognised tourist attraction in this regard. The Draft Development Plan states that it is a key priority of the Council to further enhance the attractiveness and competitiveness of Kildare as a tourism and leisure destination. The Draft Development Plan also includes a Tourism Map that identifies the tourist attractions in the County. However, the KTOV is not identified on the map despite being referenced as a key tourist attraction within the Draft Development Plan. In this regard, it is requested that the KTOV is identified on the

County Tourism Map to align with the recognised tourism role it has within the County, facilitating over 4 million visitors a year.

- 2.17 Value Retail welcomes the recognition within the new Kildare County Development Plan in relation to the KTOV and the significant role it plays within the County. Over the new Development Plan period from 2023-2029, it will be imperative that the KTOV is assisted in continuing the strategic role it plays in the County in terms of job creation, tourism and being a key economic driver for the County. In this regard, it is requested that Kildare County Council fully support the KTOV over the Plan period within the context of an ever-changing retail market that includes requirements for physical retail environments in conjunction with online retailing movements, in order for the KTOV to retain its recognised international retail profile. It is considered that a greater recognition of the KTOV by name is required in policies and objectives within the new County Development Plan to support the future potential of what the KTOV can deliver.

Proposed Policy Amendments

- 2.18 It is considered important that during the finalisation of the Kildare County Development Plan, Kildare County Council carefully consider the existing and future operational requirements of the KTOV, in light of: *changing retail trends; changing consumer behaviour; adapting to innovative forms of retailing; visitor/tourist attraction; and the benefit to the economy*. As such, it is submitted that Kildare County Council include appropriate policies to support the KTOV's ambition to protect and enhance its retail and tourism offer in Kildare County.
- 2.19 It is therefore requested that the following supportive policies and objectives, which seek to facilitate an enhanced retail and tourism offer in the County over the 6-year Development Plan period, are included by Kildare County Council in the new Development Plan for Kildare County:
- 2.20 It is requested that the following is included in the new County Development Plan:
- Insert new policy objectives as follows:

Objective XXX: To support and facilitate the further enhancement and evolution of the retail and tourist led offer and associated services at the Kildare Tourist Outlet Village.

Objective XXX: Encourage and facilitate the evolution of existing retail developments in the County by being proactive and responsive to changing retail market trends and consumer behaviour in a post COVID-19 and post Brexit environment, and recognising the need to support physical retail environments.

- Additionally, it is requested that the Draft Development Plan is updated to include **the Kildare Tourist Outlet Village on the County Development Plan Tourism Map (Drawing No. 200/22/1238)** to accurately reflect the importance of the KTOV as a tourism destination as outlined within the text of the Draft Development Plan.

2.21 It is requested that the following policy objective of the current Kildare County Development Plan is retained within the new County Development Plan:

- Retain the following policy objective:

Objective ECD32: Support the development of new tourist facilities or upgrading/extension of existing tourist facilities at tourist sites in accordance with proper planning and sustainable development principles.

2.22 Furthermore, Value Retail support the inclusion of the following policy objectives within the Draft Development Plan. However, it is requested that some minor amendments are made to some of the Draft Policies, and such requests are outlined in **green text** below:

- **RE 01:** Facilitate and support the growth of the economy in Kildare and the Greater Dublin Area in a sustainable manner, and in accordance with the Regional Spatial and Economic Strategy.
- **RE 02:** Continue to promote Kildare, together with the Kildare Local Enterprise Office and national development agencies, as a strategically located economic and employment hub within the Greater Dublin Area and support and facilitate the development of an environment that fosters innovation, enterprise and entrepreneurship but also maintains a core focus on issues around climate change and biodiversity.
- **RE 025:** Continue to support and develop Kildare Town as a bloodstock, tourism, **including retail-tourism** and manufacturing location.
- **RE P15:** Support, promote, protect, improve, encourage and facilitate the development of tourism, **including retail tourism**, throughout the county as an important contributor to job creation in accordance with the proper planning and sustainable development of the area.
- **RE 095:** Support the expansion and development of tourism in Kildare, investigating the feasibility of key opportunities such as those centred on the racing industry, motorsports, retail, heritage, historical heritage (both persons and places), geology, golf and eco-tourism to include: **the Kildare Tourist Outlet Village**, Arthur's Way, the Dublin – Galway Greenway, the Barrow Blueway, the Shackleton Trail, Shackleton Museum, Mondello the Gordon Bennett Route, the Grand Canal

Greenway, Brigid 1500, a Fitzgerald Family Trail, the Made of Athy Trail, Castledermot Town Wall and other opportunities.

- **RET O4:** *Sustain and enhance the increase in comparison expenditure inflows to the county, at regional, national and international level, through delivering a quality and quantum of retail offer in accordance with the Retail Planning Guidelines 2012.*
- **RET O9:** *Promote retail-led tourism in Kildare and to facilitate the provision of tourism infrastructure, as well as supporting the enhancement of existing retail tourism locations in the County such as the Kildare Tourist Outlet Village.*
- **RET O10:** *Encourage and facilitate innovation and diversification in the county's retail profile and offer.*
- **RET O11:** *Support existing retail facilities and to facilitate the provision of new facilities as appropriate where such proposals are in accordance with the Retail Planning Guidelines, the Regional Retail Strategy, the Core Strategy and Settlement Strategy and the proper planning and sustainable development of the area.*
- **RET O12:** *Support and encourage diversity in the retail offer, including the sustainability of the independent retail sector in the county, in response to changing retail market trends and consumer behaviour.*
- **RET O13:** *Encourage and facilitate innovation in the county's retail offer and attraction and supporting and facilitating local businesses and trades to develop and market products locally, where possible.*
- **RET O14:** *Support innovativeness in the provision of sustainable retailing throughout the county which reduces food miles and encourages more sustainable forms of transport.*
- **RET P2:** *Guide major retail development in accordance with the framework provided by the County Retail Hierarchy (Table 8.1) to enable an efficient, equitable and sustainable distribution of retail floorspace throughout the county.*
- **RET O44:** *Develop a well-designed pedestrian link from the Kildare Village Outlet Centre to the town centre, in consultation with the various third-party landowners, with a view to better integration, enhancing visitor experience and promoting the heritage and evening economy of the town centre in accordance with the guidance in the Retail Planning Guidelines 2012.*

- **RET O75:** *Encourage and facilitate the development of retailing in the tourism and leisure sectors at appropriate and sustainable locations, subject to protecting tourism and leisure amenities from insensitive and inappropriate development.*

3. Conclusion

- 3.1 Value Retail welcomes the publication of the Draft Kildare County Development Plan 2023-2029 and the opportunity to comment on the future development of the County. As outlined previously, the Kildare Tourist Outlet Village plays a significant role in the retail, economic and tourism profile of County Kildare and Value Retail are continually striving to innovate and evolve their offer, responding to the ever changing retail trends and the global retail market.
- 3.2 We trust that the matters outlined above will be taken into consideration as part of the finalisation of the Kildare County Development Plan 2023-2029. We are available for discussion on any of the matters referred to above and would also appreciate if you could confirm receipt of this submission by return.

Contact Details

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