

30 November, 2015

Sean McKeown
Head of Enterprise
Local Enterprise Office
42 Parliament Street
Kilkenny

Re: Kilkenny Local Economic and Community Action Plan 2015-2021

Dear Sean

RGDATA is the representative association for independent family grocers in Ireland. It represents supermarkets, convenience stores, forecourt stores and local shops some of which are aligned to various symbol groups and some which operate under their own family name. The independent sector represents about 34% of the Irish grocery market and members' shops are located in towns, villages and urban areas.

RGDATA represents the owners of many shops, supermarkets, convenience stores and forecourt stores within County Kilkenny. Our members have a keen interest in supporting their local economy and in ensuring that the towns, villages and urban centres throughout Kilkenny are vibrant and attractive places to live, work, shop and to do business.

RGDATA supports sustainable retail development, vibrant town centres, villages and communities and a diversity of shops that people can walk to. RGDATA has been to the fore in advocating a planned approach to retail developments in Ireland based on the principles of sustainable development. RGDATA strongly supports the Retail Shopping Directive introduced in 1998, and has been a firm advocate of the Retail Planning Guidelines introduced by the Minister for the Environment and Local Government in 2001 and updated in 2012.

RGDATA welcomes the opportunity to make a comment on the Kilkenny Local Economic and Community Plan.

RGDATA feel that the Local Authority's powers and functions can actively support economic development within the county

Kilkenny County Council should commit to adopt a plan-led approach to local and urban development, should identify retail requirements and policies that will enhance and secure town centres and villages and adhere to the Retail Planning Guidelines 2012, which support viable and vital retail zones, urban centres, town centres and self-sufficient villages.

Creating synergy throughout the County

Kilkenny County Council should commit to carefully measuring the impact of any proposed development on the towns, villages and urban centres throughout the region before agreeing to any proposals. The impact on the vibrancy and vitality of the surrounding town and village centres must be measured when planning applications for edge of town and out of town proposals are lodged for approval.

Kilkenny County Council should also commit to applying the strict interpretations contained in the Retail Planning Guidelines, to ensure that there is a vibrant, efficient and competitive retail sector, vibrant towns and villages and local shops that people can walk to. The focal point for residents in any community and surrounding hinterlands is the core of the town centre.

How Local Authority powers and functions can actively support economic development.

RGDATA urges that vacant sites in towns and villages are fully investigated for reuse and that developers with new retail proposals are directed to design their proposed plans to fit into the existing retail zones, town centres and villages in Kilkenny in a manner that will enhance their role as centres, their economic performance, retain existing jobs and facilitate the creation of new jobs. The Authority should use its powers actively to resist proposed developments that do not deliver on this criteria and encourage developers to redesign or relocate proposed developments so that they enhance the existing centres and do not create a counter attraction depleting the existing centres and creating a net loss of jobs in the area.

RGDATA welcomes your proposed initiative to introduce a small business incentive scheme, stated in Section 1.4.1 G1: Enterprise Economy Support – Actions

‘Small Business Vacant Premises Incentive Scheme’

“There were 424 vacant units in Kilkenny in 2014, 311 of these were retail and office units. The average commercial rates for a shop are €4,213 and an office is €3,688. Vacant commercial properties have a negative visual impact affecting the streetscape and business sentiment of the community and visitors alike. KCC will investigate a ‘Small Business Vacant Premises Incentive Scheme’ for the occupation of vacant commercial units. Such a scheme will support job creation; encourage businesses to occupy vacant premises; help regenerate town streetscapes; and help improve business sentiment”

Given the current high rate of vacant premises throughout Kilkenny, the County Council should use its powers to ensure that any investment in new retail development projects should be directed within town centres. There should also be investment in environmental improvements, transport infrastructure and town centre management.

Heritage Buildings

The County Council should work with the Heritage Council and other bodies to ensure that Heritage buildings throughout Kilkenny are conserved and redeveloped with the assistance of conservation architects in a way that will contribute to the cultural, social and economic viability of the local community.

RGDATA acknowledges Action 9 (A9) and Goal G8 contained in your draft plan:

A9: Develop a Retail Excellence Strategy and include cross-sectoral collaborations in areas such as shop frontage design, use of technology in sales and marketing (including online trading), and the use of local heritage and culture in marketing design.

Goal G8: Protect and Utilise the Natural, Cultural and Built Environment High-Level Objectives: To encourage and support biodiversity and the protection and enhancement of local heritage and culture, support energy efficiency and maximise the circular economy potential.

Retail Hierarchy

We emphasise the importance of confirming the retail hierarchy and role of centres, when assessing planning proposals and developments. Kilkenny County Council, when dealing with these matters should take account of the views of retailers, shoppers and property owners.

Town Centre Development

The Kilkenny Local Economic & Community Plan should adopt a strict town centre first approach and discourage any new greenfield site, edge of town or out of town development until the current unused retail and other buildings in the town centres are revamped and reopened for business. This will encourage the revitalisation of the existing towns, create synergies in the town centre that benefit all the businesses and increase footfall and will ensure new jobs are created and existing jobs are retained.

Parking

We are aware of the challenges many town centres face with restrictive parking regimes and we ask Kilkenny County Council to address this issue as you continue the process of the economic and community plan for the county. In recent years pay parking and high fines for clamping have been introduced in town centres, while free parking is available in out of town developments. This has been found to be prohibitive and acts as a disincentive for consumers to shop in the town centres. Consumers increasingly opt to avail of the free parking in out of town retail centres.

We ask for a fair and equitable balance to be achieved for the future protection of the town centres.

Encouraging Good Design to facilitate Positive Economic Growth

The 2012 Retail Planning Guidelines place particular emphasis on design issues and a Retail Design Manual has been published in tandem with the Guidelines. The Guidelines note that design is a critical issue in the consideration of any planning application for retail development and sets out key principles relevant to retail planning.

The Kilkenny Local Economic and Community Plan should address the issue of the design of the village and town centres and make a commitment that town centre zoning should not be altered or extended to outside the town boundary to accommodate an out of town development that will draw existing business away from the retail core of the town.

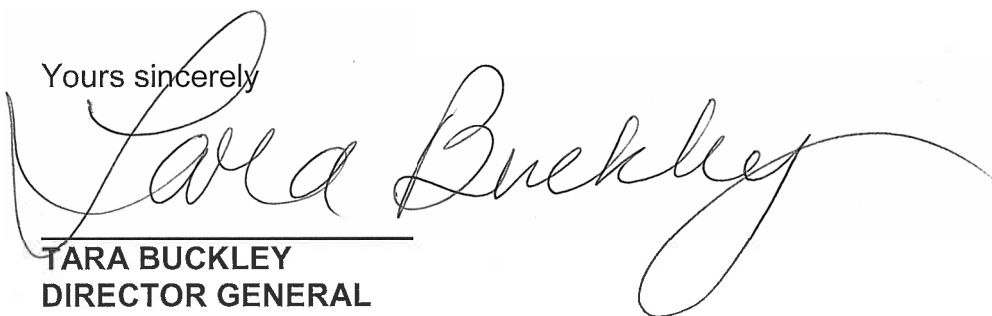
Ensure that economic growth impacts positively on all of our communities and utilise location for economic growth

In addition, land use zoning policies should ensure that lands zoned for general employment should be reserved for projects that will generate local jobs, support Irish producers and suppliers, provide a route to market for small local producers and farmers and create opportunities for reinvestment in the local community.

The County Council should make a specific commitment in this plan that retail warehousing should be accommodated only on lands specifically zoned for such purposes.

We trust that these points will be taken on board as you continue the process of the Draft Kilkenny Economic and Community Action Plan 2015-2021.

Yours sincerely



TARA BUCKLEY
DIRECTOR GENERAL