



Clare County
Development Plan
2023-2029

Draft Clare CDP 2023-2029 - Public Consultation Portal

Submitted By: Anonymous user

Submitted Time: March 28, 2022 1:46 PM

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Volume 1

Core Strategy, Settlement Strategy and Housing, Economic Development & Enterprise, Retail, Towns & Villages, Design & Placemaking

Volume 3(a) Ennis Municipal District Written Statements and Settlement Maps

Ennis/Clarecastle

Volume 3(b) Shannon Municipal District Written Statements and Settlement Maps

Volume 3(c) Killaloe Municipal District Written Statements and Settlement Maps

Volume 3(d) West Clare Municipal District Written Statements and Settlement Maps

Associated Documents

None of the above

Environmental Reports

None of the above

Your Submission

1. The Commercial land-use zoning description as outlined under 19.4 of the Draft Clare County Development Plan 2023-2029 be amended to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within Appendix 2 Indicative Land Use Zoning Matrix. Commercial The use of land zoned for 'commercial' purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail park/office type uses as appropriate. Retailing will normally be acceptable in principle under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed

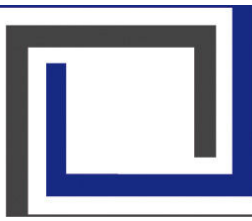
2. That the lands to the immediate east of the existing Lidl Foodstore (0.38 ha) be zoned Commercial, which reflects more appropriately the current Lidl Foodstore Retail use associated within the location in a consolidated manner, promoting the redevelopment/extension/ intensification of the existing Lidl Foodstore development which is Less Vulnerable to any potential flooding and more appropriate at this location as presented in the document uploaded as part of this submission.

Location Map



Upload Files

final Lidl CCDP Draft Plan Submission Ennis 28.03.2022.pdf, 2.27MB



Draft Clare County Development Plan 2023-2029
Planning Department
Clare County Council
New Road
Ennis
Co. Clare
V95 DXP2

Monday, 28th March 2022
[By Online submission]

Dear Sir / Madam

RE: SUBMISSION/OBSERVATION TO THE DRAFT CLARE COUNTY DEVELOPMENT PLAN 2023-2029
LIDL IRELAND GMBH – Site Specific Submission/Observation, Lidl Licenced Foodstore, Gort Road, Ennis

1.0 INTRODUCTION

1.1 Focus of Submission

The Planning Partnership has been retained by Lidl Ireland GmbH, Head Office, Main Road, Tallaght, Dublin 24, to prepare this Submission/Observation in relation to the published *Draft Clare County Development Plan 2023-2029*.

It is acknowledged that the new Development Plan aim to achieve the recovery in response to the Covid-19 pandemic, and “*deliver on aspirations for a healthy and inclusive society with a high quality of life for all people, fostering an environment to encourage job creation, innovation and economic growth, while ensuring balanced development in our towns, villages and rural areas.*”¹

It is within this context that this Submission/Observation is made, focussing on the Site Specific Policy associated with Lidl Ireland GmbH’s Licenced Foodstore located at Gort Road, Ennis, and specifically:

1. The draft proposal to zone the specific lands for the purposes of *Commercial* where the use as a “Shop” (the existing Lidl Foodstore) “will normally be acceptable in principle”, acknowledges the benefit of flood defences from the River Fergus and considered a less vulnerable use at risk of flooding within the *Classification of Vulnerability per The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009*.
2. Promote the future development, including redevelopment, or the extension or intensification of the existing Lidl Foodstore at this location, which is considered more appropriate and compatible (Less Vulnerable Development) within the current degree of flood risk associated with the lands as outlined within the *Classification of Vulnerability per The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009*.

¹ Extract *Draft Clare County Development Plan 2023-2029*, Message from Councillor PJ Ryan, Cathaoirleach of Clare County Council

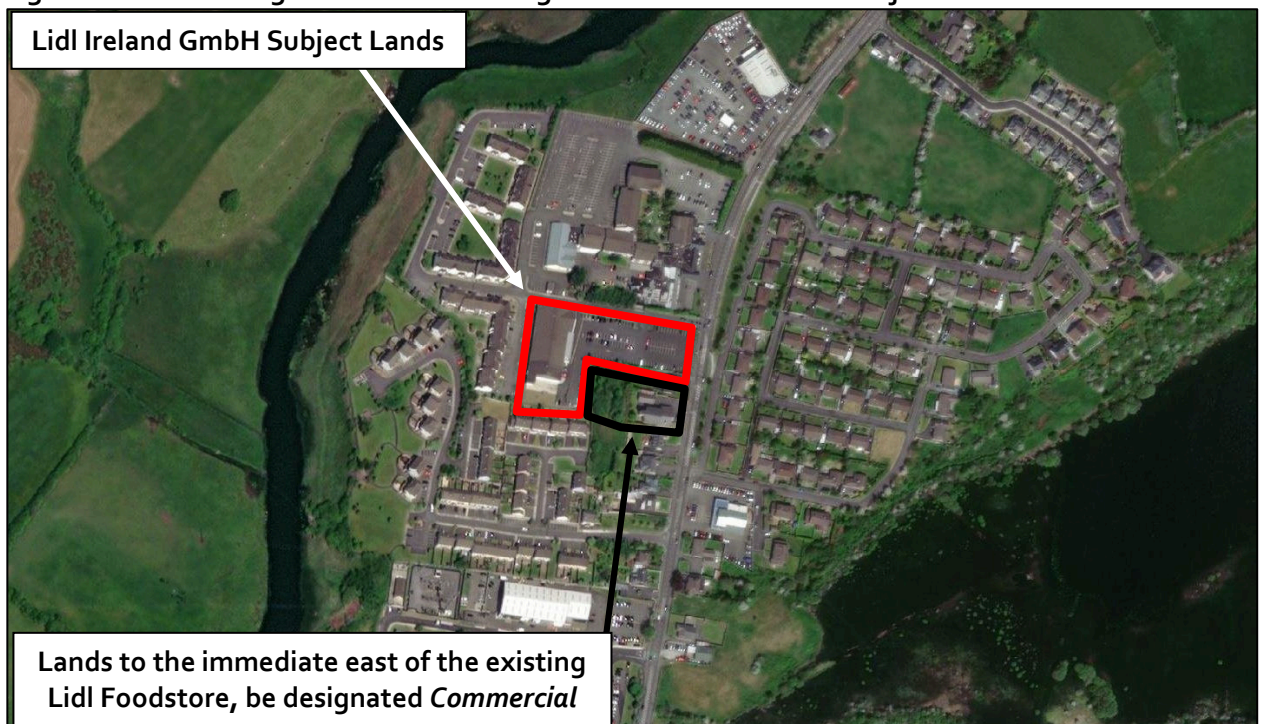
3. That the *Commercial* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended (**additional text in red** with text to be omitted ~~striketrough~~) to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*, as follows:

Commercial

The use of land zoned for 'commercial' purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail park/office type uses as appropriate. Retailing **will normally be acceptable in principle** ~~is open for consideration~~ under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed.

4. That lands to the immediate east of the existing Lidl Foodstore, proposed to be designated *Buffer Open Space* and *Existing Residential* totalling 0.38 ha, be designated *Commercial*, which reflects more appropriately the current Lidl Foodstore Retail use associated with the location.

Figure 1.1: Aerial image of Ennis illustrating the Lidl Ireland GmbH Subject Lands



Source: ESRI ArcGIS, Annotated and Reproduced by The Planning Partnership under licence.

Within the context of the foregoing, and as detailed further below, **we hereby request that:**

1. The **Commercial** land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix*; and
2. **The proposed zoning mapped objectives of lands** to the immediate east of the existing Lidl Foodstore (0.38 ha), **be designated Commercial**, which reflects more appropriately the current Lidl Foodstore Retail use associated within the location in a consolidated manner, promoting the redevelopment/extension/ intensification of the existing Lidl Foodstore development which is **Less Vulnerable** to any potential flooding and more appropriate at this location.

2.0 ZONING LANDS TO THE IMMEDIATE EAST OF THE EXISTING LIDL FOODSTORE (0.38 ha) FOR THE PURPOSES OF COMMERCIAL WILL FACILITATE THE ORDERLY REDEVELOPMENT/ EXTENSION/INTENSIFICATION AND ESTABLISH STREETScape ALONG GORT ROAD

2.1 The proposed extent of Commercial land-use zoning restricts/inhibits the redevelopment/extension/intensification potential of the existing Lidl Foodstore development

The Draft Clare County Development Plan 2023-2029 proposes that the Lidl Ireland GmbH Subject Lands be zoned Commercial, with the following description:

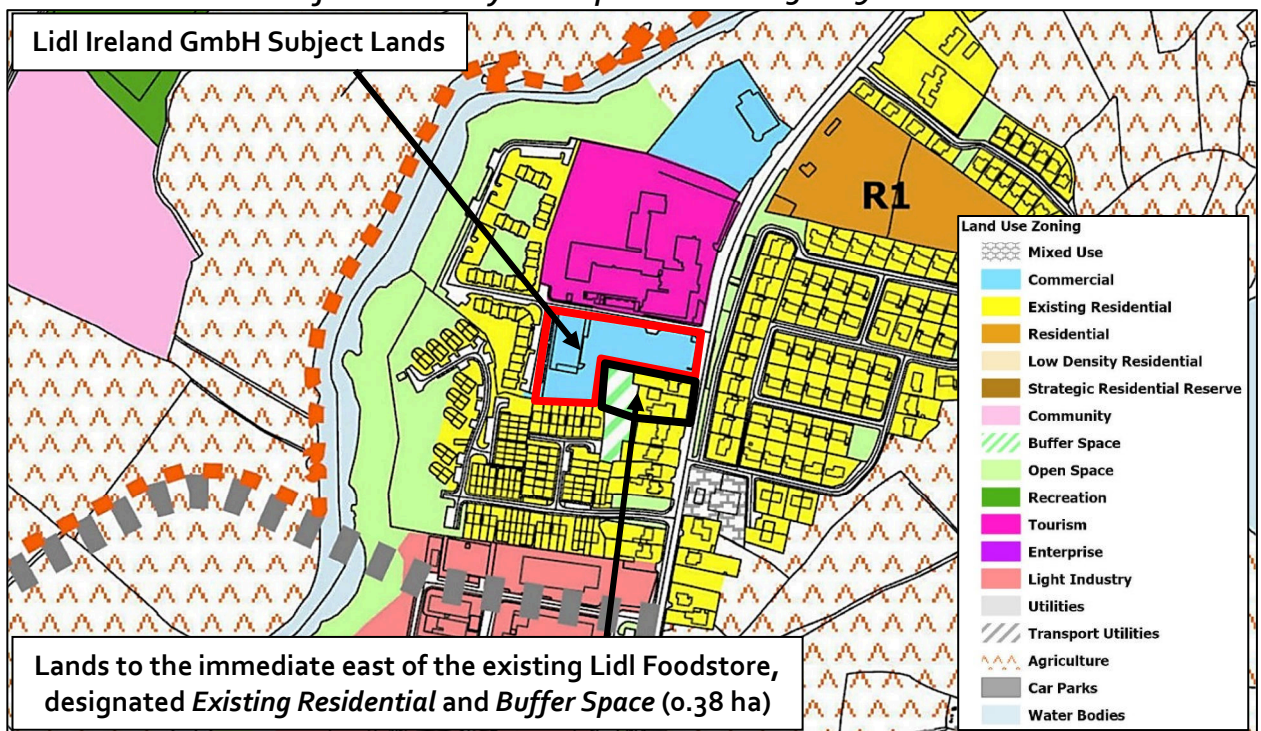
Commercial

The use of land zoned for 'commercial' purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail park/office type uses as appropriate. Retailing is open for consideration under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed.

The following land-uses 'will normally be acceptable in principle' as outlined within Appendix 2 Indicative Land Use Zoning Matrix of the Draft Clare County Development Plan 2023-2029:

Advertising Structures, B&B/Guesthouse, Bank/Financial Institution, Betting Office, Car Park, Cash And Carry/Wholesale Outlet, Cinema/Theatre, Crèche/Childcare Facility, Doctor/Dentist, Education/Enterprise Centre, Funeral Home, Health Centre/Clinic, Home Based Economic Activities, Launderette/Dry Cleaner, Leisure/Gym / Recreational Sports Club, Library, Liquor Licence Premises, Motor Sales/Repairs/Service, Office <100m², Office 100m²-1000m², Office >1000m², Open Space, Restaurant/Cafe, School/College, Shop, Tourism Complex, Training Centre, Veterinary Surgery.

Figure 2.1: Land Use Zoning Designations as Applied to Lidl Ireland GmbH Subject Lands Under the Provisions of the Draft Clare County Development Plan 2023-2029



Source: Land Use Zoning Map of the Ennis Draft Clare County Development Plan 2023-2029, extracted, reproduced and annotated by The Planning Partnership under OS Licence No. AR0114722

It is our professional planning opinion that the proposed *Commercial* zoning extent restricts/inhibits the redevelopment/extension/intensification potential of the existing Lidl Foodstore at this location, and the *Commercial* description is not consistent with uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix*.

2.2 ***The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009* acknowledge 'Residential' development to be more vulnerable than 'Retail' development**

The vulnerability of development to flood events depends on the nature of the development, its occupation and the construction methods used. For example, a sheltered housing/residential complex would be more vulnerable than a Lidl Licenced Foodstore retail unit.

The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 has developed a broad classification of vulnerability system, classifying different land uses and types of development as highly vulnerable, less vulnerable and water-compatible. The classification is influenced primarily by the ability to manage the safety of people in flood events and the long-term implications for recovery of the function and structure of buildings after flood events.

We do acknowledge that flood protection measures in appropriate locations can significantly reduce flood risk. However, *The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009* details that the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. The likelihood and extent of this residual risk needs to be considered, together with the potential impact on proposed uses, at both development plan and development management stages.

It is acknowledged that the Lidl Ireland GmbH Subject Lands and the extent of lands to the immediate east of the current Lidl Licenced Foodstore, is not at imminent risk from flooding despite the defences in place.

Zoning lands to the immediate east of the existing Lidl Foodstore for the purposes of *Commercial* will consolidate the lands into a viable redevelopment potential for Lidl Ireland GmbH, while retaining substantive economic benefits to the area.

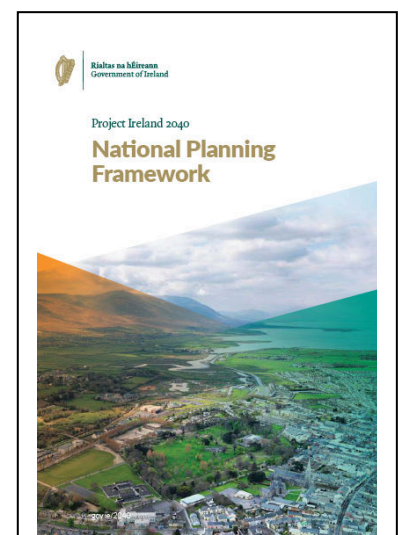
2.3 **National Planning Framework – Project Ireland**

NPO 4: *Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.*

NPO 5: *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*

NPO 6: *Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.*

NPO 11: *In meeting urban development requirements, there will be a presumption in favour of development that can encourage more*



people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

NPO 27: Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments and integrating physical activities for all ages.

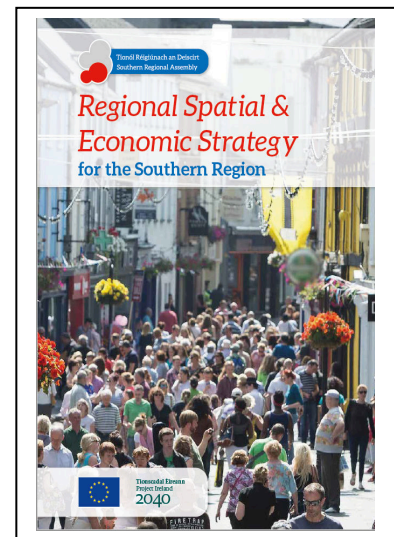
NPO 28: Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

2.4 Regional Spatial Economic Strategy for the Southern Region

RPO 2 Planning for Diverse Areas: The RSES recognises the strategic role played by all areas, both urban and rural, in achieving the set regional and national targets and objectives. The RSES supports sustainable enterprise growth, services, physical and social infrastructure investment and the sustainable growth of all communities in the Region. The overall strategy builds on cities and their associated metropolitan areas as engines of growth and seeks, in parallel, to re-position the Region's strong network of towns, villages and diverse rural areas in an economically resilient, imaginative and smart way to foster sustainable competitive advantage.

RPO 10 Compact Growth in Metropolitan Areas: To achieve compact growth, the RSES seeks to:

- a. Prioritise housing and employment development in locations within and contiguous to existing city footprints where it can be served by public transport, walking and cycling.
- b. Identify strategic initiatives in Local Authority Core Strategies for the MASP areas, which will achieve the compact growth targets on brownfield and infill sites at a minimum and achieve the growth targets identified in each MASP. Such strategic initiatives shall comply with MASP Goals to evolve innovative approaches for all MASPs. Initiatives may include:
 - Support the creation and role of Active Land Management Units with a remit to focus on the metropolitan areas and compact growth targets;
 - Partnerships with the Land Development Agency to progress housing and employment delivery in city and town centres, focusing on co-ordinating and developing large, strategically located, publicly owned land banks, reducing vacancy and increasing regeneration of key sites;
 - Support the role of the local authority as a development agency to kick start regeneration processes;
 - Seek design competitions for key strategic sites that deliver greater density, mixed uses where appropriate, sustainable design, smart technology, green infrastructure and public gain through good design;
 - The identification of public realm and site regeneration initiatives which combine, on an area wide basis, opportunities for regeneration of private owned underutilised sites, public owned underutilised sites, private and public buildings and upgrade of parks, streetscapes and public realm areas; and



- *Creation of continually updated databases identifying brownfield, infill sites, regeneration areas and infrastructure packages to enable progress towards achieving compact growth targets. Through active land management initiatives, identify strategic locations for residential growth responding to the growth targets and achievement of compact growth and employment growth.*

RPO 55 Retail: *It is an objective to:*

- Improve the physical appearance, vitality and vibrancy of city centre, town centre and village locations through collaboration between Planning Authorities and Retail Traders Associations in regeneration / public realm projects and other measures;*
- Ensure that retail development is focussed on urban and village centres with the application of a sequential approach to consideration of retail development which does not fall into this category;*
- Prepare Retail Strategies in accordance with the Retail Planning Guidelines including Joint Retail Strategies where applicable. Proposed public realm or urban regeneration projects should be assessed for potential impacts on the receiving environment including capacity of existing services at project level. Where public realm or urban regeneration projects would significantly increase shopper/visitor numbers, planning authorities should ensure that projects include sustainable management of increased demand for access to city/town centre locations.*

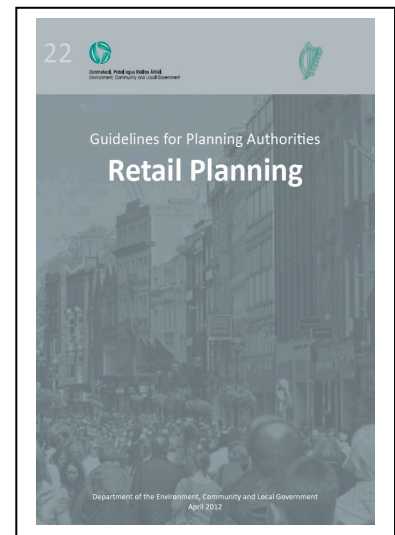
RPO 62 Location for Employment Development: *It is an objective to:*

- Identify future locations for strategic employment development having regard to accessibility by sustainable transport modes and environmental constraints.*

2.5 Retail Planning Guidelines (2012)

2.5.3 Competitiveness in the Retail Sector: *Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity.*

The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.



2.5.4 Encouraging Sustainable Travel: *While the private car tends to be attractive for activities such as more substantial convenience goods shopping or bringing home bulky goods, careful location of retail developments and attention to detail in terms of how they are connected by footpaths and cycle facilities to surrounding areas can substantially boost trips on foot or bicycle for smaller purchases and make a substantial difference in encouraging smarter travel in line with the Smarter Travel strategy.*

2.5.5 Retail Development and Urban Design: *Quality design aims to create attractive, inclusive, durable, adaptable places for people to work in, to live in, to shop in, or pass through.*

Planning authorities should promote quality design in retailing in their development plan and/or retail strategies and then implement this through the development management process. This is of particular importance for retail development because of the dominant visual and use role it plays in a city, town or village streetscape.

3.3 Development Plans and Retailing: *The function of the development plan is to establish an overall strategy for the proper planning and sustainable development of its area.*

Specifically in relation to retailing, the development plan must be:

- *Evidence-based through supporting analysis and data to guide decision making;*
- *Consistent with the approach of these guidelines; and*
- *Clear and concise with regard to specific objectives and requirements.*

5- Set out strategic guidance *on the location and scale of retail development to support the settlement hierarchy, including where appropriate identifying opportunity sites which are suitable and available and which match the future retailing needs of the area;*

7- Mobility management measures- *that both improve accessibility of retail areas while aiming to develop a pedestrian and cyclist friendly urban environment and vibrant street life.*

4.4 Sequential Approach to the Location of Retail Development:

City and Town Centres: *The centres of cities and towns are the most suitable locations for the higher order fashion and comparison goods and are the most accessible locations for the majority of the catchment population. They should be supported in maintaining and expanding their retail offer to serve that population in a sustainable way which will also help to reduce the need to travel.*

4.9 Retail Impact Assessment: *However, where a planning authority considers an application for planning permission to develop a new retail development to be particularly large in scale compared to the existing city/town/district centre, or where a retail strategy or development plan has allocated a specific type and quantum of retail floorspace to a particular settlement and a proposed development absorbs on one site the bulk of that potential retail floorspace, the planning authority may request the applicant, by way of a Retail Impact Assessment (RIA) as set out in Annex 5, to demonstrate compliance with the development plan and that there will not be a material and unacceptable adverse impact on the vitality and viability of any existing centre. This is a matter for careful technical assessment and professional judgement.*

4.11.5 Retailing in Small Towns and Villages: *The role of small towns and villages in the provision of retail services to their local urban and rural populations should be defined in development plans. Where appropriate, the maximum size of store, consistent with maintaining a variety of shops in the centre of these towns and villages and protecting an appropriate level of retail provision in the rural area, should be identified. In general there should be a clear presumption stated in favour of central or edge-of-centre locations for new developments.*

4.11.6 Local Retail Units: *Local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.*

3.0 OUR REQUEST

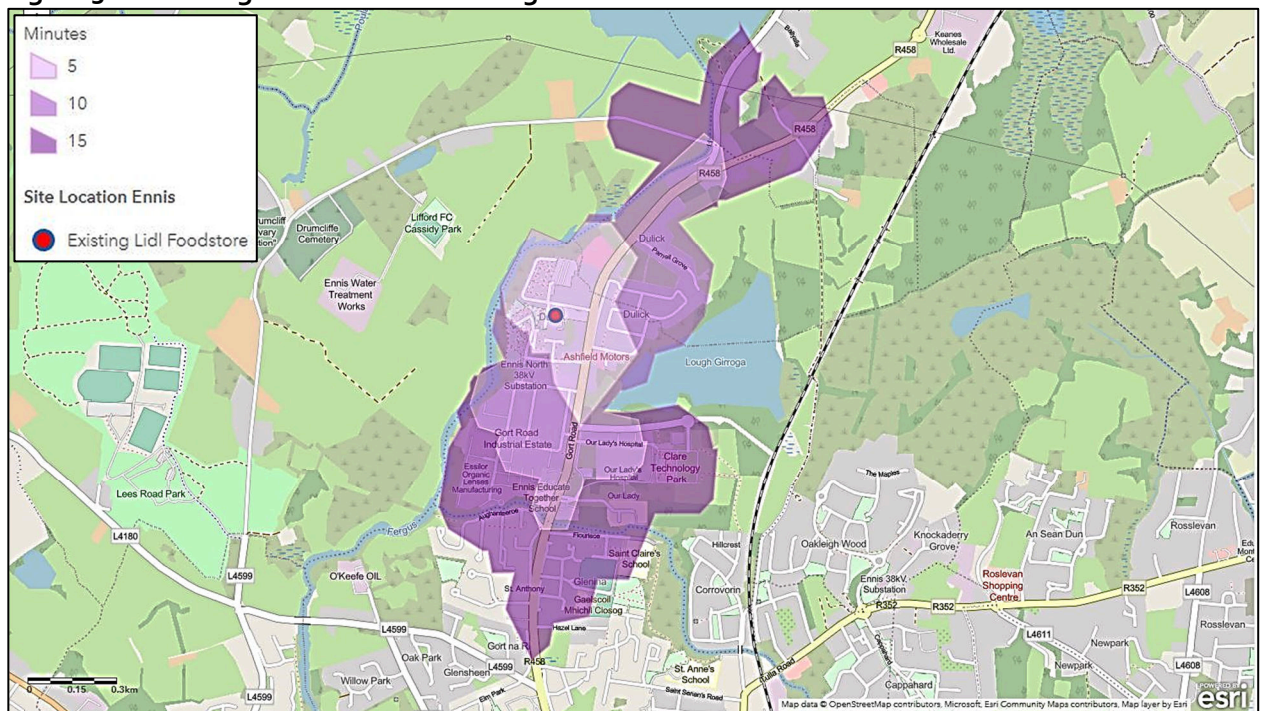
Acting as a catalyst to further positive development, the *Retail Planning Guidelines 2012* state that “retailing plays a major role in attracting people to the centre of cities, towns and villages, thus contributing to the overall economic vitality of those centres and supporting their role as centres of social and business interaction in the community...”.

The *Retail Planning Guidelines 2012* go on to say that retailing “...also supports the considerable investment by the public and private sectors in urban renewal, by providing shopping facilities to residents and by adding to the vitality and attractiveness of inner areas of cities and towns which is important also in the context of the tourism sector”.

As Clare County Council is promoting the concept of 10-minute town concept and active travel principles arising from the Ennis 2040 Strategy, all of which support green infrastructure, active living and sustainable residential development, the redevelopment of the Lidl Foodstore will continue to provide convenience shopping to its immediate catchment area

Figure 3.1 below presents graphically three Walking Catchment areas, i.e. a 5 minute, 10 minute, and 15 minute average speed walk, which are served by the existing Lidl Foodstore for Ennis and providing convenience retail to the immediate residential catchment improving their quality of life.

Figure 3.1: Walking Catchment of existing Lidl Foodstore for Ennis



Source: ESRI ArcGIS, Annotated and Reproduced under Licence by The Planning Partnership March 2022

From a detail review of the *Draft Clare County Development Plan 2023-2029*, it appears that inconsistencies are presented within the *Commercial* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029*, and the uses which ‘will normally be acceptable in principle’ as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*.

The *Commercial* land-use zoning description presents that retailing is only “open for consideration” under this zoning, contrary to *Land Use Zoning Matrix* detailing that ‘Shop’ “will normally be acceptable in principle”.

The *Planning and Development Regulations 2001* (as amended) defines:

'shop' means a structure used for any or all of the following purposes, where the sale, display or service is principally to visiting members of the public –

(a) for the retail sale of goods,

(b) as a post office,

(c) for the sale of tickets or as a travel agency,

(d) for the sale of sandwiches or other food or of wine for consumption off the premises, where the sale of such food or wine is subsidiary to the main retail use, and "wine" is defined as any intoxicating liquor which may be sold under a wine retailer's off-licence (within the meaning of the Finance (1909-1910) Act, 1910), 10 Edw. 7. & 1 Geo. 5, c.8,

(e) for hairdressing,

(f) for the display of goods for sale,

(g) for the hiring out of domestic or personal goods or articles,

(h) as a launderette or dry cleaners,

(i) for the reception of goods to be washed, cleaned or repaired,

but does not include any use associated with the provision of funeral services or as a funeral home, or as a hotel, a restaurant or a public house, or for the sale of hot food or intoxicating liquor for consumption off the premises except under paragraph (d), or any use to which class 2 or 3 of Part 4 of Schedule 2 applies;

As noted from the above, it is clear that 'Shop' presents retail activities/uses which 'will normally be acceptable in principle' on *Commercial* zoned lands as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*.

Accordingly, we hereby request:

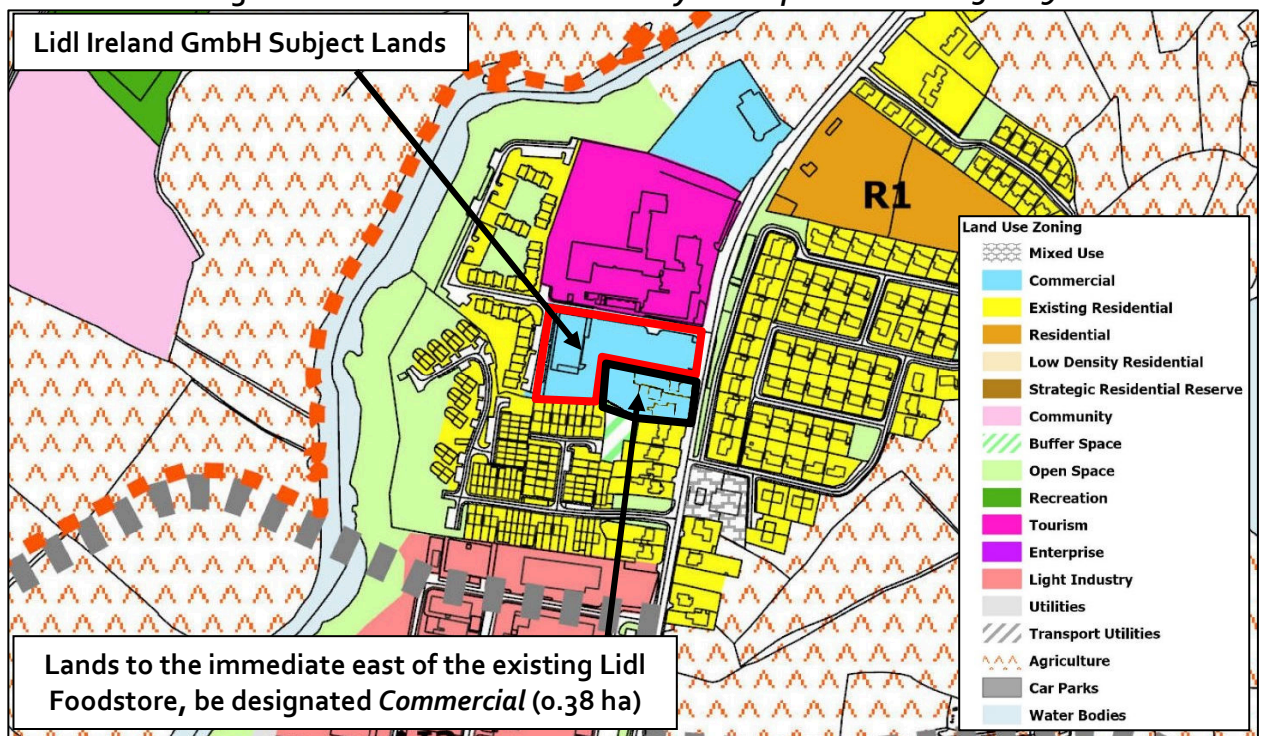
1. That the *Commercial* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended (**additional text in red** with text to be omitted ~~striketrough~~) to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix* of the *Draft Clare County Development Plan 2023-2029*, as follows:

Commercial

The use of land zoned for 'commercial' purposes shall be taken to include the use of the lands for commercial and business uses including offices, service industry, warehousing and the facilitation of enterprise/retail park/office type uses as appropriate. Retailing **will normally be acceptable in principle** ~~is open for consideration~~ under this zoning, provided that a sequential test is carried out and the lands are demonstrably the optimum location for the nature and quantum of retail development proposed.

2. That the lands to the immediate east of the existing Lidl Foodstore (0.38 ha) be zoned *Commercial*, which reflects more appropriately the current Lidl Foodstore Retail use associated within the location in a consolidated manner, promoting the redevelopment/extension/intensification of the existing Lidl Foodstore development which is Less Vulnerable to any potential flooding and more appropriate at this location as presented in Figure 3.2 below.

Figure 3.2: Proposed Land Use Zoning Designations to be Applied to Lands to the immediate east of the existing Lidl Foodstore in new *Clare County Development Plan 2023-2029*



Source: Land Use Zoning Map of the *Ennis Draft Clare County Development Plan 2023-2029*, extracted, reproduced and annotated by The Planning Partnership under OS Licence No. AR0114722

4.0 LIDL Ireland GmbH – A key driver in delivering convenience retail

Retail and retail services play a vital role in sustaining towns like Ennis, and good quality retail services function as a catalyst for other forms of economic activity, thereby encouraging viability and vitality, and enhancing sustainability. Accordingly, the content of this submission has sought to focus on retail policies and objectives associated with Lidl Ireland GmbH Subject Lands, and lands to the immediate east of the existing Lidl Foodstore in new *Clare County Development Plan 2023-2029* in Ennis.

Lidl Ireland GmbH has a long-established presence along Gort Road in Ennis. The original Lidl Ennis building has been the subject of various upgrades and adaptations. However, the experience of these upgrade/modernisation programmes indicated that the design format of these store does not lend itself to further adaptation. As Lidl continues to evolve to meet the requirements of its growing customer base, many of the older format stores, notwithstanding their physical age, have reached the end of their serviceable lives.

The overall objective of this submission is to ensure that the spatial policy and planning framework which is to be contained within the adopted *Clare County Development Plan 2023-2029*, will aid Clare County Council in facilitating the future sustainable expansion of Lidl Foodstore Retail enterprises to the benefit of the residents of Ennis. The modifications/amendments to the *Draft Clare County Development Plan 2023-2029* proposed within this submission, should be seen within this context.

The core objectives of this upgrade/modernisation programme is one of visual improvement and operational nature, being aimed at enhancing the functionality of stores within the network, specifically in terms of the quality of visual design, and the quality and extent of their 'back-of-house' areas, to include modern facilities for staff and customers as well as larger storage areas which will contribute to efficiencies in supply chain functionality.

Finally, we submit that the emerging *Clare County Development Plan 2023-2029* should strongly encourage appropriate expansion of existing retail facilities throughout the County including facilitating the expansion of the Discount Foodstore sector, not least in terms of the associated employment generation, but also while retaining substantive economic benefits to the area.

5.0 CONCLUSION

In closing, The Planning Partnership wishes to make this submission with regards to the future vitality and vibrancy of Ennis and the inherent opportunities to deliver upon the objectives of the Council as outlined in the *Draft Clare County Development Plan 2023-2029*.

The presence of a permitted Licenced Discount Foodstore confirms the principle of convenience retail established on the subject site.

We hereby request that:

1. The *Commercial* land-use zoning description as outlined under 19.4 of the *Draft Clare County Development Plan 2023-2029* be amended to ensure consistency with development uses which 'will normally be acceptable in principle' as outlined within *Appendix 2 Indicative Land Use Zoning Matrix*; and
2. The proposed zoning mapped objectives of lands to the immediate east of the existing Lidl Foodstore (0.38 ha), be designated *Commercial*, which reflects more appropriately the current Lidl Foodstore Retail use associated within the location in a consolidated manner, promoting the redevelopment/extension/ intensification of the existing Lidl Foodstore development which is Less Vulnerable to any potential flooding within the *Classification of Vulnerability* as outlined within *The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009*.

Should you have any queries or require any further information in relation to the above please do not hesitate to contact me.

Yours faithfully



Wessel Vosloo
Principal
The Planning Partnership