

Submission No. 142

Development Plan Review,
Planning Department,
Clare County Council,
New Road,
Ennis, Co Clare.
V95 DXP2



Via email: forwardplan@clarecoco.ie

Date: 16th November 2020

Dear Sir/Madam

RE: SUBMISSION IN RESPECT OF THE PROPOSED CLARE COUNTY DEVELOPMENT PLAN 2022-2028 – ISSUES PAPER

1. Introduction

- 1.1. On the 18th September 2020 Clare County Council (Clare CC) published a notice stating it was proposing to prepare a new Development Plan for the county. An Issues Paper was published which invited written submissions by the 16th November 2020.
- 1.2. On behalf of our client, Aldi Stores (Ireland) Ltd, Limerick Road, Mitchelstown, Co. Cork, and in response to the notification of the intention to make a new development plan, we wish to make a submission in relation to the Issues Paper and particularly in relation to the county town of Ennis.
- 1.3. Aldi have existing stores located in Ennis Town Centre, Ennistymon, Kilrush and Killaloe. Aldi is keen to further expand their network of stores which serve residents of the County and in this regard wish to develop additional stores in Shannon and a second store in Ennis.
- 1.4. Aldi has been actively seeking to develop additional stores to serve the county and Ennis in particular for the past number of years. Aldi is seeking to provide additional stores within the catchment area of Ennis and its surrounds where there is an identified shortfall in provision and lack of consumer choice.
- 1.5. This submission does not relate to a particular parcel of land but rather requests that the Planning Authority maintain the suitably zoned lands in the town centre, edge of centre or in smaller centres (i.e. neighbourhood or district centres) which can currently accommodate a discount foodstore format.

Managing Director: John P. Spain BBS MRUP MRICS ASCS MRTPI MIPI

Executive Directors: Paul Turley BA MRUP Dip Environmental & Planning Law MIPI Rory Kunz BA (MOD) MSc-ERM MAT&CP Dip EIA Mgmt MIPI
Stephen Blair BA (Mod) MRUP MIPI MRTPI Mary Mac Mahon MSc TCP Pg Dip MSP Pg Dip Env Eng Dip Env Plg Law Dip Mgmt Dip EIA & SEA B Soc Sc MIPI

Senior Associate Directors: Stephanie Byrne BA MRUP MIPI Blaine Cregan B Eng BSc MSc

Associate Directors: Luke Wymer BA MRUP Dip Plg & Env Law Dip PM Prof Cert Env Mgmt MIPI Meadhbh Nolan BA MRUP MRTPI Kate Kerrigan BA MSc MRTPI

John Spain Associates Ltd. trading as John Spain Associates. Directors: J. Spain, S. Spain.
Registered in Ireland No. 396306. Registered Office: 39, Fitzwilliam Place, Dublin 2. VAT No. IE 6416306U

Associate Offices:

London

Manchester

Leeds

Regional Spatial & Economic Strategy for the Southern Region

- 1.6. Ennis is identified as a 'key town' within the '*Regional Spatial & Economic Strategy for the Southern Region*' with a population of 25,276 (2016). This overarching document describes key towns as;

'Large population scale urban centre functioning as self-sustaining regional drivers.'

'Strategically located urban centres with accessibility and significant influence in a sub-regional context.'

- 1.7. In particular, Ennis is noted as 'a county town, with significant zone of influence'. Further, the strategy states that;

'it is envisaged that local authorities should plan for population growth of more than 30% by 2040.'

- 1.8. Therefore, the continued growth and development of the town should be provided for in accordance with the National Planning Framework and the Regional Strategy. It is important that appropriate services including retail provision is available for both the current and future population of the town.

2. Clare County Development Plan 2017 – 2023

- 2.1. '*Commercial*' zoned lands within the current Clare County Development Plan 2017-2023, include the objective:

"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".

- 2.2. Retailing is open for consideration in 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.
- 2.3. This zoning applies to a number of potential suitable sites in Ennis, in addition to a neighbourhood centre objective. It is well established that small supermarkets / discount foodstores in the region of 1,500 sq.m net floorspace are appropriate in neighbourhood centres in large urban areas throughout the country. There are numerous examples nationwide of discount foodstores in neighbourhood centres in urban areas.
- 2.4. It is respectively requested that the new County Development Plan provides a consistent and flexible approach to convenience retail provision within Ennis and its environs, providing the planning controls needed to encourage convenience retailing to grow.
- 2.5. It is considered that there is a gap in convenience retail provision in the Ennis catchment area which could be provided for at a neighbourhood centre location. Typically, an Aldi store involves investment in the region of €5m to €10m and employs in the region of 30 people representing a significant investment and employment opportunity for any town which is particularly relevant in the current retail climate.

3. Conclusion

- 3.1. The new County Development Plan will guide future development in the county and in Ennis town from its adoption. Aldi are actively seeking a suitable site to develop a second store in the town of Ennis and it is respectfully submitted that the new Development Plan should identify potentially suitable sites for such a development, which can attract additional retail spending to the town, whilst providing improved competition and options for current shoppers. Further, a new store would generate additional employment both in the short term (construction stage) and in the longer term.
- 3.2. A proactive plan-led approach to the delivery of retail development accords with the recommendations of the Retail Planning Guidelines which puts an increased focus on improving competition in the retail sector. In this regard the new Development Plan should recognise the important role discount foodstores or medium scale supermarkets can play in supporting healthy town centres and neighbourhood centres with competitive retail environments and contain specific policies and objectives in relation to this type of retail development.
- 3.3. Therefore, it is respectfully submitted in relation to Ennis, that the new draft Development Plan provides appropriate retail planning policies and zoning objectives which will facilitate further retail development in the town and to facilitate opportunities for Aldi to realise their objective of development of a second store. This includes sites in relation to the Town Centre and also importantly, identify Neighbourhood Centres which complement the existing Town Centre convenience retail.
- 3.4. It is respectfully requested that the Development Plan clearly states that small supermarkets up to 1200 sq. metres net sales are permissible in identified Neighbourhood Centres and carry forward existing policies for specific centres in this regard, where relevant.
- 3.5. If you wish to discuss this submission in further detail please do not hesitate to contact us.

Yours faithfully,



John Spain Associates

