

DRAFT CARLOW COUNTY DEVELOPMENT PLAN 2022-2028

Senior Executive Officer
 Draft Carlow County Development Plan 2022-2028
 Planning Department
 Carlow County Council
 Athy Road
 Carlow

Friday, 1st October 2021
 [By Email: <https://consult.carlow.ie/>]

Dear Sir/Madam,

RE: SUBMISSION TO DRAFT CARLOW COUNTY DEVELOPMENT PLAN 2022-2028 ON BEHALF OF LIDL IRELAND GMBH

1.0 INTRODUCTION

The Planning Partnership have been retained by Lidl Ireland GmbH, Lidl Regional Distribution Centre, Littleconnell, Newbridge, Co. Kildare, W12 KT98 to prepare this submission in respect of their existing property in the County, and in relation to Retail Planning issues affecting Carlow Town in particular.

Lidl currently operate 3 no. stores in Carlow, in Carlow Town, Tullow and Bagenalstown, employing a substantial number of staff. In line with ongoing expansion plans nationally, Lidl intend to broaden their offering in the County over the lifetime of the forthcoming Development Plan.

In terms of issues arising from a review of the Draft County Development Plan, we summarise the proposals herein as follows:

1. Realign the zoning boundaries at Lidl, Tullow Road, Carlow Town, to include a portion of land to be acquired to facilitate future expansion (planning application pending for same);
2. Modify Neighbourhood Centre policies / objectives (including the zoning objective wording) to reflect existing patterns, to more closely align to the adjoining Laois County Council approach, and to align classifications to the *Retail Planning Guidelines, 2012*; and,
3. Redesignate / rezone the enlarged Carlow Town site as a Neighbourhood Centre (subject to above changes to Neighbourhood Centre policies / objectives / limits). The subject site can act as a multi-nodal / polycentric centre in conjunction with adjoining smaller clusters. There are existing examples of same in Carlow town presently.

The below elaborates on these issues, setting out a rationale for each.

We consider that the modifications proposed are not significant in nature, rather relate generally to relatively minor changes to the general thrust and spirit of the policies and objectives of the Draft County Development Plan and Retail Strategy as published, and to reflect the well established pattern of development in the area.

2.0 LIDL, TULLOW ROAD, CARLOW

Lidl currently operate an existing Discount Foodstore at Tullow Road, Carlow, Co. Carlow, R93 XA49 as illustrated below.

Lidl are also in the process of purchasing an area of an adjoining property (shed / warehouse and yard area to rear of dwelling along Browneshill Road Lower, Carlow, R93 N8P9) to facilitate the expansion of the existing store, as illustrated in Figure 1 below by dotted outline.

Figure 1: Aerial View of Subject Site (Approx. Boundaries Outlined in Red)



Source: Bing Maps

At present, both the existing Lidl demise and the proposed site extension area, as illustrated in Figure 2 below, are similarly zoned (*Residential 1. Established*) under the *Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018*.

Figure 2: Existing Subject Site Zoning (Outlined in Red – Line of Extension Dotted – Approx.)



Source: Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012-2018 Zoning Map

The below Figure 3 illustrates a revised zoning objective for the existing Lidl site, to reflect its existing long established use (the existing Lidl store commenced trading on site in November 2006).

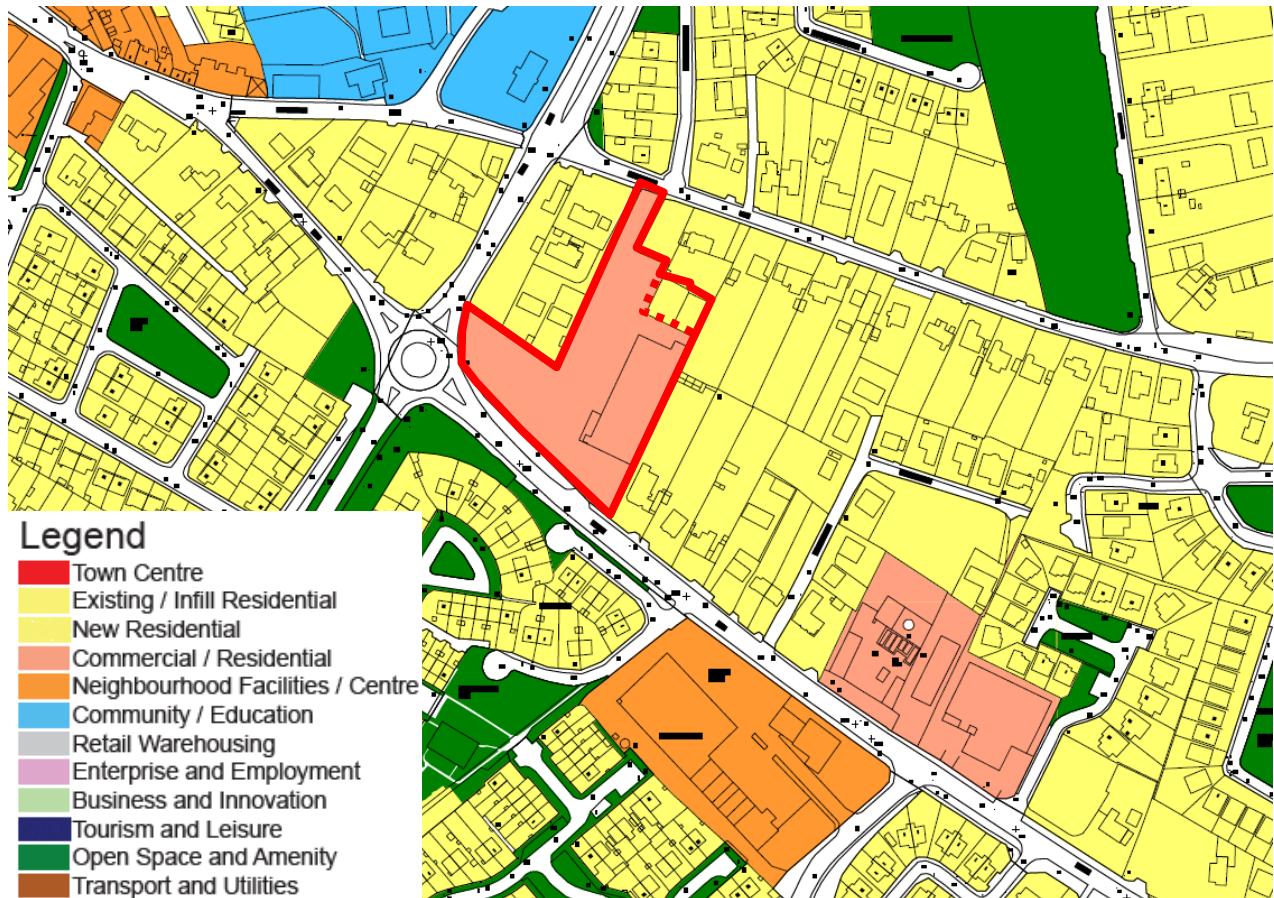
The Draft Carlow Town zoning however excludes the proposed site extension area, which also has an extant long established commercial use.

Notwithstanding that the extension area is located to the rear of a dwelling, it is distinct from the dwelling, being a self contained (and separately accessed¹) commercial premises, confirmed from a review of both the An Post GeoDirectory and the Valuation Office database. The latter refers to same as a 'Warehouse' in the 'Industrial Uses' category (Property No.: 2184591, Local No. Map Ref: 15B/2).

This current proposal will most likely be determined prior to the adoption of the new Development Plan, and this process may therefore have no material bearing on the application process. Nonetheless, the Planning Authority are requested to amend the zoning boundary to reflect the proposed expansion of the Lidl site, to ensure that the forthcoming plan accurately reflects intended Lidl curtilage / demise.

¹ The existing commercial access way is to be retained by the existing landowner and would be anticipated to be formally incorporated into the dwelling curtilage, where it would be currently informally within same.

Figure 3: Subject Site (Draft) Zoning (Outlined in Red – Line of Extension Dotted – Approx.)



Source: Draft Carlow County Development Plan Carlow Town Zoning Map

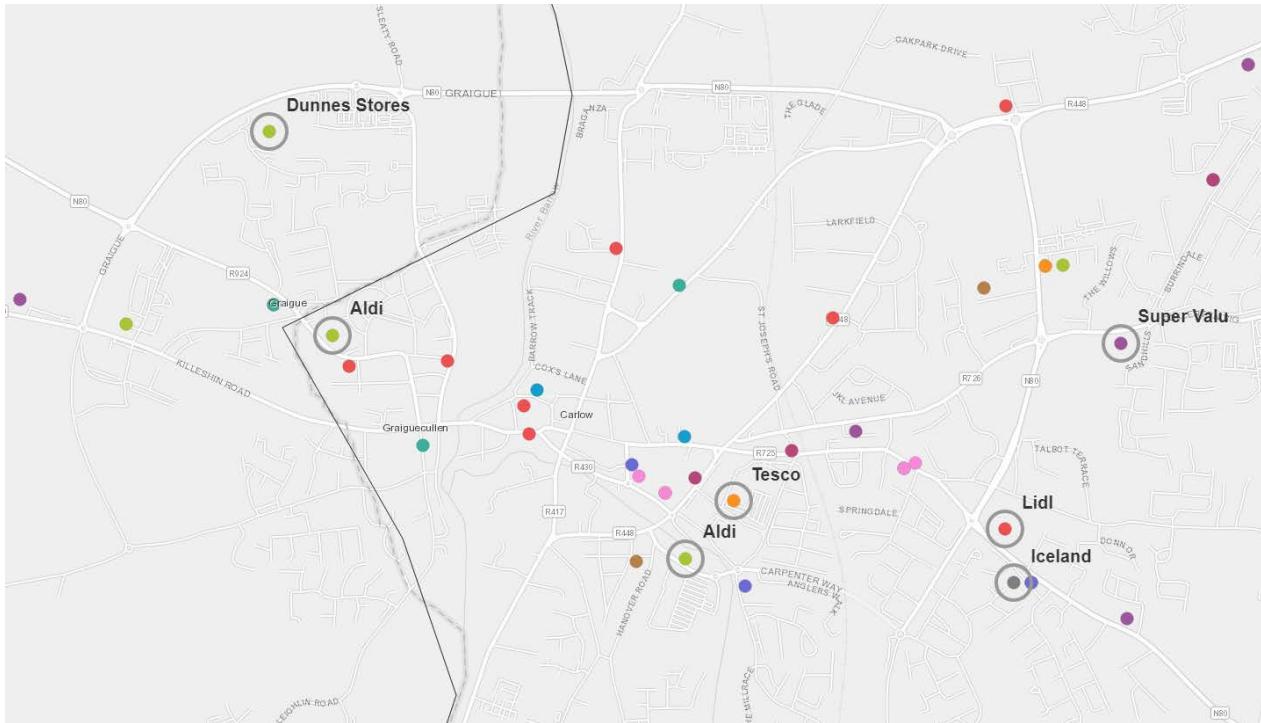
3.0 NEIGHBOURHOOD CENTRE POLICY

We submit that the Neighbourhood Centre policies / designations in the Draft County Development Plan and associated Retail Strategy should be modified, where they primarily relate to Carlow Town, which would enable the designation of the existing Lidl Carlow town site (as extended) as a Neighbourhood Centre (subject to removal of current floorspace restrictions) in lieu of the *Commercial / Residential* zone.

This is in order to reflect a more dynamic and evolving retail and town centre development approach, where:

- a) Customers expect a greater range of shopping at a local level which current floorspace restrictions undermine;
- b) Customers have increasingly convenient online shopping choices where there is no effective limit to the range of goods available (which is a principal effect of limiting floorspace);
- c) The town centre / town core is decreasingly a location for food shopping, rather is increasingly specialising in higher order retailing, leisure, hospitality, food and tourism experiences;
- d) Carlow town centre / town core is already heavily diversified away from convenience / food shopping, in terms of the existing distribution of Supermarkets and Superstores around the settlement (including across the county boundary into Laois County Council's functional area). Figure 4 below illustrates the distribution of convenience outlets, with the main supermarkets highlighted; and,
- e) Unnecessary restriction of floorspace or other restrictions to continuation of the existing pattern of distributed convenience retailing in Carlow County Council area could result in unintended consequence of increasing the attractiveness of the Laois County Council functional area where greater flexibility arises.

Figure 4: Convenience Retail Distribution across Carlow Town



Source: ESRI ArcGis & GeoDirectory, annotated by the Planning Partnership

Whilst the Draft Plan and Retail Strategy includes policies for such centres, the limits imposed render them relatively ineffective in delivering a meaningful supply of new or renewed floorspace in the settlement.

For instance, (page 145) of the Retail Strategy refers to Neighbourhood Centres providing a floor area not exceeding 1,200 sqm net. Similarly, on page 93 of the Draft Development Plan, the same limit is suggested. The zoning objective of Neighbourhood Facilities / Centre also imposes a limit of 1,500 sqm gross (effectively c. 1,000-1,100 net).

We submit that this approach would result in "... *failure to achieve the necessary focus ...*" as was recognised as an important Neighbourhood Centre consideration in the existing Retail Strategy for the Greater Carlow Graigecullen Urban Area 2012.

By comparison, we note the Draft Laois County Retail Strategy allows for "... *medium scale convenience along with small to medium scale comparison ...*" in Neighbourhood Centres. In our experience medium scale convenience would be in the order of up to 1,750 sqm net convenience (i.e. mid scale Supermarket).

In this regard, we note the *Retail Planning Guidelines, 2012* definition of Supermarket which is: "Single level, self service store selling mainly food, with a net retail floorspace of less than 2,500 M²."

More explicitly 'releasing' the Town Centre / Core from a perceived / implied role of being the primary source / location of food shopping facilities in the overall settlement will also enable the fulfilment of other policies and objectives for the Town Centre / Core, for instance relating to fulfilling Carlow's role as a regional high order settlement, competing with Kilkenny, Newbridge, Portlaoise, Kildare Village, Dublin City Centre, etc.

At present, the Town Centre Core is implicitly designated as the default location for all retailing facilities, including food / convenience (with Neighbourhood and District locations being somewhat / implicitly secondary – due to floorspace limits in particular), regardless of the role such floorspace plays in terms of the primary function of the Town Centre Core. However, the primary function of the town core is more related to higher order retailing and leisure / recreation / tourism uses and experiences.

The provision of large scale convenience floorspace in the Town Centre Core can therefore be somewhat of an opportunity cost in terms of failing to exploit the best opportunities that arise for the town.

Project Carlow 2040: A Vision for Regeneration for instance has a number of key objectives, which largely relate to promoting the higher order role of the town as a centre of commerce and activity / recreation / leisure, etc. along with a renewed emphasis on town centre living.

In this regard, explicit delegation of the somewhat 'lower order' of retailing that is convenience retailing, to Neighbourhood Centres (and District Centres and non-retail designated locations such as the *Commercial / Residential* zone), subject to a retail impact and/or sequential assessment where appropriate is essential if the Town Centre Objectives of the emerging Development Plan and Retail Strategy are to be realised.²

We also note that the Draft County Retail Strategy refers to the impact of the COVID-19 pandemic has had on different types of retailers and notes that:

"The retail sector was facing into issues prior to the 2020 Pandemic in terms of challenges that were long term and structural. Covid-19 and the lockdown measures put in place have exacerbated retail woes many times over..."

The nature of retail is changing both in Ireland and internationally and much of this change has been accelerated due to the Covid-19 Pandemic. While the trend of online retailing had been gaining pace over the years, the transition for a number of retailers before the Pandemic was not quite as swift. Since the Pandemic however, the number of retailers with an online presence doubled since its penetration into the market over 20 years ago.

According to a European survey conducted by Accenture in June 2020, consumers are beginning to shop more locally and mindfully by utilising locally sourced products from within their own neighbourhoods. The Report highlights 56% percent of consumers are shopping in neighbourhood stores or buying more locally sourced products, with 79% and 84% respectively planning to continue with this behaviour into the longer term." [Our Emphasis]

The ongoing pandemic has demonstrated the critical role of the Foodstore (Corner shop, Neighbourhood Shop, Discount Foodstore, Supermarket, Superstore, etc.) as a strategic service, and one which is needed locally and not on a centralised basis.

If all food shopping were principally provided within / directed to the Town Centre Core, it would lead to unnecessarily excessive concentrations of people, whereas during the periods of restricted movement, local shopping has played an important role in facilitating the minimisation of travel.

In addition, we note that a key action outlined in IBEC's 'Reboot & Reimagine' campaign is to: "*Ensure fair competition: We must support and maintain the domestic retail sector's competitiveness and ability to grow, sustain jobs and deliver great choice and value to consumers..."*

Covid-19 has also demonstrated that Convenience shopping is now highly exposed to change and a potential shift to online shopping platforms. Limiting local access to sufficiently scaled physical stores will only encourage and accelerate the transition to online shopping options.

² We note that under the Draft Carlow Town Plan, unfettered *Shop (Convenience)* use is *Permitted in Principle* under the Commercial / Retail zoning, i.e. with no floorspace limit. This should remain the case, at least up to the scale of a *Supermarket*, i.e. up to 2,500 sqm net retail sales area.

For instance, online grocery sales have increased from pre-pandemic level of 2.7% to 6.3% of all sales in February 2021, more than doubling in a year, according to Kantar.³

We reiterate that the limitations on Neighbourhood Centres in the Draft Development Plan and Retail Strategy could impact on the distribution of retailing in Carlow Town, by encouraging development in the Laois County Council functional area, where more scope / flexibility is provided for neighbourhood type shopping.

Finally, we also reiterate that existing store acts as a *de facto* Retail Centre through proximity to an existing adjacent Centre and having a well established pattern of trade. The proposed redevelopment and site enlargement, and suggested zoning and policy changes herein, will not materially change this.

4.0 CONCLUSION

We trust the above is of interest and will be considered by the Planning Authority and look forward to the publication of the *Draft Carlow County Development Plan 2022-2028* in due course.

We reiterate the proposed alterations sought herein, as follows:

1. Realign the zoning boundaries at Lidl, Tullow Road to include adjoining Commercial lands;
2. Modify Neighbourhood Centre policies and objectives (including the zoning objective wording) to expressly facilitate *Supermarket* use, as defined by the *Retail Planning Guidelines, 2012*; and,
3. Designate the extended Lidl site at Tullow Road as a Neighbourhood Centre (subject to no. 2 also occurring).

In our opinion, the proposed modifications are in line with the core principles of both local and national policies, and primarily seek to modify the Development Plan to increase its level of relevance in terms of reflecting existing patterns, and to provide greater clarity as to the intent of the key policies and objectives of the Development Plan (and Retail Strategy).

We await the publication of the Material Amendments to the Draft Development Plan and associated documents, which we trust will clearly facilitate the expansion of the existing Carlow store, whilst also facilitating the expansion of retail in general, at other potential locations in Carlow town or other settlements in the County.

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

Yours faithfully



Fintan Morrin

Associate

The Planning Partnership

³ <https://www.rte.ie/news/business/2021/0308/1201651-kantar-supermarket-figures/>