

# DRAFT CITY DEVELOPMENT PLAN

Senior Planner  
Planning Department  
City Hall, College Road  
Galway, H91 X4K8

Wednesday, 13<sup>th</sup> April 2022  
[By Email: [devplan@galwaycity.ie](mailto:devplan@galwaycity.ie)]

Dear Sir/Madam,

**RE: SUBMISSION TO DRAFT GALWAY CITY DEVELOPMENT PLAN BY LIDL IRELAND GMBH**

## 1.0 INTRODUCTION & SUMMARY

### 1.1 Purpose & Scope of Submission

The Planning Partnership, McHale Retail Park, Castlebar, Co. Mayo, have been retained by Lidl Ireland GmbH, Lidl Distribution Centre, Ballyhea, Charleville, Co. Cork, P56 XW95 to prepare a submission in relation to the Draft Galway City Development Plan. Lidl currently employ over 100 staff in Galway City which is anticipated to significantly increase in the short term subject principally to the ability of the planning system to facilitate Lidl's expansion plans.

In general terms we note from a review of the Draft Plan a number of significant 'disconnected' and potentially counter productive or contradictory policy and objective approaches, which cumulatively undermine the core goals and objectives of the Development Plan.

As such we consider that fundamental changes are appropriate, which are readily achievable, as set out herein. We also note that many of the issues raised in the previous 'Pre-Draft' submission remain outstanding. In terms of specific issues arising from a review of the Draft City Development Plan, we summarise as follows:

1. Disconnected and confusing inter relationship between zoning objectives, 'regeneration' objectives, the retail hierarchy and specific local objectives. Such results in unexplained, undefined and unclear obligations on the development of land, which significantly adds to the risks associated with the planning process;
2. Disconnect between (sustainable) transport objectives and zoning objectives, 'regeneration' objectives, the retail hierarchy and specific local objectives. Such results in lost opportunities in encouraging retail development on key transport corridors at existing transport hubs;
3. Absence of a Retail Strategy and timeline or any urgency for same;
4. Absence of alignment with requirements of the Retail Planning Guidelines;
5. Absence of a clearly defined and layered retail hierarchy, and resultant absence of any meaningful guidance on the location or scale of retail development below the level of District Centre;
6. Preservation of an unexplained, undefined and unclear restriction of retail in terms of 'local retailing needs', which contradicts and undermines the overall approach to land use and retail development;
7. Absence of clearly defined District Centres;
8. Need for recognition (e.g. as District Centre) of the retail role of Salthill in the City; and,
9. The emerging Development Plan must adapt to the new development and population growth imperatives set down by the National Planning Framework and the Regional Spatial and Economic Strategy, and set appropriate ambitions accordingly. In a retail context, this has not been achieved in the current Draft Plan, with a continuation of the pre-existing strategy predominating.

The below elaborates on these issues, setting out a rationale for each. We consider that the modifications proposed relate generally to appropriate changes to the general thrust and spirit of the policies and objectives of the Draft City Development Plan as published, or as is already national and regional policy under the National Planning Framework and the Regional Spatial and Economic Strategy.

## 2.0 STRATEGIC PLANNING ISSUES

### 2.1 The Changed Role of the City

The new City Development Plan is the first such plan to take account of a significantly changed settlement strategy at a national level, set out under the National Planning Framework and the Regional Spatial and Economic Strategy.

For instance, we note the current Development Plan and preceding Regional Planning Guidelines contained a population target of 98,700 by 2022.

In comparison, the current Draft Development Plan includes a long term population uplift of +40,000 – 45,000 (at least 120,000 population in total), and/or at least 114,900 persons by 2031, compared to a Census 2016 population of 79,900.

This represents a dramatic shift in scale and pace of development for the city, and this policy is mandated at a national and regional level. The local City Development Plan must put in place policies and objectives to enable and service this population growth.

The Draft Plan includes scenarios such as *Baseline/Business as Usual* and *50:50 City*, the former being self explanatory and the latter being based on the implementation of the National Planning Framework.

The latter approach projects a difference of over 13,000 additional persons living in the city, an increase of c. 16% by 2031.

This highlights that a *Business as Usual* approach to policies and objectives will not be adequate to meet the statutory objectives of the planning authority to give effect to the National Planning Framework and the Regional Spatial and Economic Strategy, nor to make the City an attractive place to work, live or visit. As noted in the Draft Plan for instance:

***"Galway City will become a city of scale and a key driver of growth and prosperity for the Northern and Western Region***

***Strategic Goals: ■ Develop a more urban compact form in the city that provides for attractive, integrated, and easily accessible neighbourhoods that are supported by appropriate levels of services and amenities.***

***Planning authorities must therefore demonstrate how their Core Strategy and other elements of their plan are consistent with the established NPF Roadmap population projections for their local authority area and accordingly, with the related NPF 50:50 city housing demand projection scenario identified by the ERSI.***

***This approach is in contrast to previous methodologies used by local authority plans which utilised population projections to assess housing demands.***

***It is acknowledged that these population forecasts are targets and may not be achieved by the benchmarked years of 2026 and 2031, but regardless provision should be made to facilitate the opportunity for such growth on zoned lands within the existing local level plans in the overall MASP area as shown in Figure 1.4.***

*This will support the objectives of the NPF and the RSES to deliver Galway Metropolitan area as a **national strategic growth area with the ability to accommodate the compact sustainable growth levels envisaged in the NPF to be reached by 2040.*** [Our Emphasis]

As demonstrated in detail below, we do not consider that retail policies and objectives have been sufficiently developed to meet the above requirements, as a number of shortcomings arise, many of which were highlighted in our previous submission.

## 2.2 The Role and Importance of Food Shopping

Reiterating our previous 'Pre-Draft' Submission, we consider that in relation to *Convenience Retailing*, there is considerable potential for expansion by Lidl Ireland GmbH (and others) within the Galway City functional area and such expansion would be entirely in accordance with the proper planning and sustainable development of the city.

For instance, existing policies, which whilst requiring an element of updating, remain valid insofar as they relate to the expansion of *Convenience Retailing* on a neighbourhood basis, e.g. dispersing convenience facilities throughout the city close to residential areas.

For example, the previous (2002) Retail Strategy stated that: "*Convenience goods trading is not a critical use for the city centre and is more suitably located near the immediate market it services, in the city this is in the residential suburbs*" whilst the current Development Plan notes the "*the need to encourage competition, achieve equitable distribution of retailing opportunities and achieve a good geographical spread sensitive to catchment profiles*".

Discount Foodstores, given their scale, i.e. small to medium sized supermarkets, provide an ideal opportunity to implement the delivery of local / neighbourhood convenience retailing facilities without being of such a scale as to compete with the city centre, or indeed District Centre in many cases.

The Draft Plan reiterates same, stating for instance:

***"This evolution of shopping in town centres from a functional activity to an experience for customers broadens the remit of retail planning policies to include for other associated factors and the need to ensure the attraction of place. This requires encouragement for a mix of complementary non-retail uses such as food and beverage offers, culture, recreation, leisure uses and for enhancement of the public realm and enablement of an all year round calendar of events.***

***The retail strategy for this plan is to direct major expansion in retail development into the city centre, in particular that of a high order comparison nature and to reinforce the function of the city centre as the hub of public life in Galway. It is considered that the success of expansion of retail services will be strengthened where it is delivered in tandem with, a diversity of uses, new neighbourhoods and an expansion of public spaces arranged in a consolidated and compact format and framed in high quality design.***

***This approach reflects the success of modern retail formats where the development of the sector operates in a broader economic context, with a mix of complementary uses and activities where shoppers have easy access and an experience of a good quality urban environment. Galway City centre has much to offer in this regard with a high quality built and natural environment, a range of other uses, good leisure and recreational opportunities, cultural experiences and an all year round calendar of events. However the city will need to expand and diversify the retail offering to remain competitive, service the ambitious population growth targets, and to provide for the associated employment needs.***

*There is also a **trend for a number of existing retail units with small floorplates to be replaced by leisure uses such as restaurants and cafes.** Where appropriate, particularly in the secondary streets, **these uses can add to the vibrancy and experience of the traditional 'bricks and mortar' shopping** and help conserve and re-use many of the historic buildings. These streets and their adaptable uses have also proven the potential of the outdoor economy during the Covid-19 pandemic restrictions with outdoor seating, entertainment and markets. With appropriate controls and management **these uses, generally relating to the hospitality sector, have the ability to further activate streets and add to the attraction of the city centre as a destination.**" [Our Emphasis]*

This is also supported by the *Retail Planning Guidelines, 2012* which notes that in relation to "Policy Principles of the Sequential Approach" for "City and Town Centres" that "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."

In this regard we note the specific omission of convenience retailing in a City Centre context. Furthermore, the Retail Planning Guidelines refer to the Sequential Approach being applied specifically to District Centres as opposed to treating the District Centre as an 'out of city centre' location for example.

### 2.3 Covid-19 Implications for Retailing

Reiterating our previous 'Pre-Draft' Submission, 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 provided within the city centre, or restricted to a narrow set of centres, it would lead to unnecessarily excessive concentrations of people, and would also require much more travel and longer journeys. For instance, during the period of restricted movement to within 2km, and current 5km restrictions, 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 physical stores will only encourage and accelerate the transition to online shopping options.

In this regard we submit that the delaying of the preparation of the Retail Strategy is unfortunate, and furthermore the retail sector is in a constant state of change, such that there will always be an element of datedness in any snapshot of the sector. The Strategy should nonetheless be advanced without delay in our opinion, and the necessary quantitative and qualitative research commissioned.

Specific policies and objectives should then be created to be sufficiently flexible to be adaptable to emerging trends and patterns in the sector. As noted in the Retail Planning Guidelines for instance "... *forms of retailing may evolve which are inadequately described by current terminology, and should be assessed on their merits*".

## 2.4 The Retail Hierarchy – a Hierarchy of Centres

The Draft Development Plan proposes to facilitate food / convenience retailing across a range of locations, in part through the designation of a retail hierarchy of centres, including the City Centre (Level 1), District Centres (Level 3), Neighbourhood Centres (Level 5), and Local Centres (Level 6). Levels 2 & 4 relate to other centres outside the City.

This hierarchy is also largely independent of the land use zoning pattern / strategy for the city.

This approach is considered appropriate and in accordance with general retail planning principles and the *Retail Planning Guidelines, 2012*.

The specific role of each level of the hierarchy is however somewhat unclear and conflated as a result, as highlighted in our previous submission.

For instance District, Neighbourhood and Local Centres all provide *local* retailing facilities.

Supermarkets (of varying scales) are appropriate in all such centres, as confirmed by the *Retail Planning Guidelines, 2012* where it states that 'basic convenience shopping' is provided "*in small supermarkets or convenience shops*".

Accordingly, there is a lack of clarity as to what scale of convenience retail is appropriate in each centre, given that all convenience retail in particular should be provided at local level rather than on a centralised basis.

Furthermore, the zoning objectives, independent of the retail hierarchy, facilitate retail uses. For instance, the *Commercial/Industrial (C1) Land Use Zoning Objective* provides for "*Retail of a type and of a scale appropriate to the function and character of the area*".

This has for instance allowed for Supermarket scale development across a number of sites in the city, which are not explicitly designated retail centres, e.g. Fr. Griffin Road, Doughiska Road, Ballybane Road, Monivea Road (*Reg. Ref: 20/332*) and a Supermarket was previously granted under (*Reg. Ref: 06/223*) at the former Crown Paints site.

Greater clarity is required in our opinion, in order to provide clear guidance to direct the future pattern of retail development across the city, in particular the food sector.

Key to this in our opinion is:

- a) A simplified / consolidated (convenience) retail hierarchy of centres; and,
- b) A broadened / clarified retail hierarchy of outlet types.

## 2.5 The Retail Hierarchy – a Hierarchy of Outlet Types

The Draft Development Plan similarly does not provide clarity on the hierarchy of types of retail outlets, in terms of specific ranges or categories of scale, as provided to varying extents in other Development Plans nationally and the *Retail Planning Guidelines, 2012*.

This is contrary to the requirements of the Retail Planning Guidelines, 2012 which state:

*At a minimum, City and County Development Plans must therefore: 1. State the elements of their **settlement hierarchy** in line with the relevant regional planning guidelines and their core strategy; 2. Outline **the level and form of retailing activity appropriate** to the various components of the settlement hierarchy in that core strategy...; 3. Define, by way of a map, the **boundaries of the core shopping areas** of city and town centres and also location of any district centres (See Section 3.4); [Our Emphasis / Emphasis in Guidelines]*

In terms of retail type, the Guidelines defines a Supermarket, a Superstore, a Hypermarket, Forecourt Retailing, etc.

As widely discussed, the distinction / categorisation of a *Discount Foodstore* was removed in the update of the 2005 Retail Planning Guidelines, resulting in Discount Foodstore's now falling within the category of Supermarket.

As much less widely acknowledged however, the previous distinction / categorisation of a *Convenience Outlet* was also removed in the replacement of the 2005 Retail Planning Guidelines (with the current 2012 Guidelines), resulting in such outlets now also falling within the category of Supermarket.

In our opinion, three core 'levels' of scale could be considered appropriate in terms of a hierarchy of outlet types, being as follows:

1. Corner / Symbol Group<sup>1</sup> Shop – e.g. up to c. 250 sqm net retail sales area – providing a limited level of service, along well established market formats;
2. Local / Neighbourhood Supermarket – e.g. up to 2,500 sqm net retail sales area – providing for essential household food shopping at an accessible level; and,
3. District Supermarket / Superstore – e.g. a number of outlets each up to 2,500 or 5,000 sqm net retail sales area – providing for multiple outlet household and specialist food shopping.

Lidl would naturally occupy the middle layer, of a small to medium Supermarket, with Lidl outlets traditionally ranging in size generally between 1,000 – 1,750 sqm net retail sales area.

The scale of Supermarket that could be deemed appropriate would vary depending on the characteristics of a given site, allowing a case by case assessment of proposals on their individual merits.

Such an approach would in our opinion provide the necessary clarity in terms of matching types of retail with types of location – see below for a suggested simplified / consolidated (convenience) retail hierarchy of centres.

Furthermore, this approach would be wholly in keeping with the *Retail Planning Guidelines*, as it is based on the principles of the Guidelines, and is similar to well established principles / approaches in other local authority areas.

For instance the four Dublin Planning Authorities each define a Neighbourhood Shop as serving a local community area and generally measuring up to 2,500 sqm net retail sales area.

<sup>1</sup> Typically, an independent retailer that is a member of a larger organisation known as a symbol group, e.g. Centra, Costcutter, Gala, Daybreak, Spar, Londis, etc.

## 2.6 Simplified / Consolidated (Convenience) Retail Hierarchy of Centres

As noted above, a simplified / consolidated (convenience) retail hierarchy of centres is called for in our opinion, in order to provide greater clarity on the operation of retail planning (and zoning) policies in the city.

In this regard, we consider that there should be two key levels: a) the City Centre; and, b) District Centres. It should also be explicitly clear that the latter are equal to the former with regard to convenience retailing.

With regard to a third level of Neighbourhood Centre, we note the continued absence of a strictly formal Neighbourhood Centre designation, e.g. in the form of a specific zoning or mapped set of objectives.

This should continue, albeit with confirmation that there is no formal layer of Neighbourhood Centres, but rather that below the level of District Centre, convenience retailing would first and foremost be based on the extant Development Plan criterion of being "*of a type and of a scale appropriate to the function and character of the area*".

In this regard a network of retail outlets of a Local / Neighbourhood scale could be provided, expanding on the existing network, as need and demand arises in the city and its suburbs.

To facilitate same, Local / Neighbourhood Supermarkets e.g. up to 2,500 sqm net retail sales area, should be 'permitted in principle' or 'open for consideration' under most zoning objectives, e.g. *Residential, Commercial/Industrial*, etc. This approach would be similar to well established principles / approaches in other local authority areas, for instance the Dublin Planning Authorities.

In the alternative, the Planning Authority should formally designate, and map, neighbourhood centres, and clarify the scale and type of retail allowable in such centres.

The current lack of clarity and wide disparity in scale and provision is in our opinion not conducive to the proper provision of retail and allied services in the city and its residential neighbourhoods.

## 2.7 Local Retailing Needs

We note that the Draft Development Plan continues to include a specific caveat on a wide number of *Commercial/Industrial* zoned sites where retailing is limited to *local retailing needs* (other than as *provided for in the Retail Hierarchy*) at or adjoining: Briarhill, Doughiska Road (West of), Tuam Road, Dublin Road, Sean Mulvoy Road, Sandy Road, Headford Road / Bóthar na Treabh (north of the Bodkin junction), Seamus Quirke Road and former Corrib Great Southern Hotel site.

No definition of *local retailing needs* is provided, nor is any clarity on what being *provided for in the Retail Hierarchy* would entail.

We reiterate that a *Business as Usual* approach is not appropriate nor sustainable in light of national and regional planning policies, along with this approach being in direct contravention of the *Retail Planning Guidelines* as it applies to plan making.

In relation to the lack of a definition or scale, there are a number of examples of Supermarkets (at a scale of up to 1,296 sqm net retail floorspace) being permitted under the *local retailing needs* restriction, e.g. Lidl Doughiska (*Reg. Ref's: 08/719 & 11/190*) and the former Crown Paints site (*Reg. Ref's: 06/223 & 12/277*).

More recently however An Bord Pleanála have under *Ref: ABP-307522-20* created a degree of uncertainty in terms of what scale of retailing is appropriate to the *local retailing needs* affected areas, in refusing permission for a scale of 1,193 sqm net retail sales floorspace.

The City Council subsequently refused permission for a yet smaller store under *Reg. Ref: 21/299* (currently under Appeal under *ABP- 312059-21*).

The new Development Plan should in our opinion move to address this uncertainty, by removing the *local retailing needs* caveat, and facilitating a three tier hierarchy of outlets as set out above.

In the event that a *local retailing needs* type caveat is considered essential as part of the forthcoming Development Plan, the scale of same should be clearly defined as part of a hierarchy of outlets, which we consider would fit between the above *Corner / Symbol Group Shop* and *Local / Neighbourhood Supermarket* levels, as revised as follows, or some variation thereof:

1. Corner / Symbol Group<sup>2</sup> Shop – e.g. up to c. 250 sqm net retail sales area – providing a limited level of service, along well established market formats;
2. Local Supermarket<sup>3</sup> – e.g. up to 1,250 sqm net retail sales area<sup>4</sup> – providing for essential but limited household food shopping at an accessible level;
3. Neighbourhood Supermarket – e.g. up to 2,500 sqm net retail sales area – providing for essential household food shopping at an accessible level; and,
4. District Supermarket / Superstore – e.g. a number of outlets each up to 2,500 or 5,000 sqm net retail sales area – providing for multiple outlet household and specialist food shopping.

Lidl would naturally occupy / operate across both of the middle layers, i.e. a Local Supermarket or a Neighbourhood Supermarket, with Lidl outlets traditionally ranging in size generally between 1,000 – 1,750 sqm net retail sales area.

In terms of clarifying which level would be permitted in which zoning area, this could be addressed via 'permitted in principle' / 'compatible use' and 'open for consideration' / 'contributory use' Development Plan conventions.<sup>5</sup>

For instance in the *Residential, Commercial/Industrial*, etc. zones, a Local Supermarket could be a 'compatible use' and a Neighbourhood Supermarket a 'contributory use'.

Alternatively a new Neighbourhood Centre zoning objective could be established, which clearly and definitively identifies all existing and future centres. In which case in the *Residential, Commercial/Industrial*, etc. zones, a Local Supermarket could be a 'contributory use'.

In addition however, clarity on what being *provided for in the Retail Hierarchy* would entail is required in the event of any preservation of the *local retailing needs* type caveat.

For instance, it should clarify how to measure being provided for in the retail hierarchy, e.g. stating that any proposals would be subject to the sequential approach, for instance to explicitly facilitate consideration of edge of (District or City) centre scenarios, as is the approach of the *Retail Planning Guidelines*.

This issue is of particular importance in the context of the current reference to being *provided for in the Retail Hierarchy*, as an edge of centre location is *provided for in the Retail Hierarchy* subject to the sequential approach.

<sup>2</sup> A symbol group retailer is an independent retailer that is a member of a larger organisation known as a symbol group, e.g. Centra, Costcutter, Gala, Daybreak, Spar, Londis, etc.

<sup>3</sup> As noted above, referencing the Retail Planning Guidelines, even basic / small shops fall within the 'Supermarket' category.

<sup>4</sup> Having regard to the established precedents / examples within the city to date, we consider that 1,250 sqm net retail sales area would represent an appropriate threshold for distinguishing between the smaller Supermarkets below this level, and the medium Supermarkets up to Superstore scale.

<sup>5</sup> Equivalent to the "Uses which are compatible with and contribute to the zoning objective" and "which may contribute to the zoning objectives, dependant on the CI location and scale of development" conventions of the Galway City Development Plan.

## 2.8 Commercial/Industrial Land Use Zoning Objective

We note that this zoning objective provides the bulk of commercial type land across the city area, outside of the city centre and more dedicated use areas such as enterprise and industrial uses, etc.

In this regard, the *Commercial/Industrial* zoning could more appropriately be reformatted to a *Mixed Use* type zoning, and presented as same, with corresponding 'permitted in principle' / 'compatible use' and 'open for consideration' / 'contributory use' conventions in keeping with similar scenarios in other cities and large urban centres.

This issue is further exacerbated by the additional 'layer' of 'Regeneration and Opportunities Sites' which imposes a further set of objectives and standards on a wide range of locations.

Some of these are directly at odds with the underlying zoning objective, for instance promoting substantial residential proportionality to potential future schemes on C/I zoned lands (e.g. the Arch Motors, Shantalla Road and the Former Connaught Laundry sites).

In this regard we note that the C/I zoning objective specifically states that: "*Residential content*" in the zone is limited to that "*of a scale that would not unduly interfere with the primary use of the land for CI purposes*".

A number of the 'Regeneration and Opportunities Sites' would wholly and detrimentally *interfere with the primary use of the land for CI purposes*.

## 2.9 Specific Objectives

As noted above, the Development Plan includes specific caveats and objectives or other commentary on a wide range of sites as an additional layer of detail / direction as regards the future development of lands within the city.

This approach is considered appropriate in principle, notwithstanding the suggested removal of the *local retailing needs* caveat, which we reiterate should be removed.

In attributing specific objectives or other commentary on a wide range of sites across the city, we consider however that mapped numbered objectives would be an appropriate solution, to ensure that there is clarity as regards the exact intention of the Planning Authority.

In the absence of clearly defined / located objectives, the existing specific objectives are somewhat unclear with regard to the precise area(s) / location(s) of land concerned, or have the potential to be misunderstood.

In this regard we note the identification of the 'Arch Motors' site as a specific location, along with 'Seamus Quirke Road' as a specific location under the 'Regeneration and Opportunities Sites' section of the Draft Plan.

As such, the reference to 'local retailing needs' under the Commercial/Industrial Land Use Zoning Objective could be assumed to be removed from the 'Arch Motors' site as the reference under the zoning objective refers to 'Seamus Quirke Road'.

If the 'local retailing needs' is to be preserved, which we consider would be wholly inappropriate for the reasons outlined above, it should be clarified as to what specific sites it applies to.

## 2.10 Regeneration and Opportunity Sites

We note the designation of a number of areas as 'Regeneration and Opportunity Sites'. In the first instance, we consider that clarity is required in relation to the numbering and mapping of same, as the Draft Development Plan map is somewhat unclear with the outline of the sites being similar to other outlines (i.e. a black line) such as the N6 road corridor, etc.

A specific 'Regeneration and Opportunity Sites' map should be prepared in our opinion, with each site numbered. The Draft Plan (text) refers to 20 no. sites however Sections 10.5-10.22 appear to include only 18 no. sites, with some being grouped, etc. Other sites are mapped but do not appear to be discussed in detail (e.g. Eyre Square East), whilst other sites are not clearly designated as 'Regeneration and Opportunity Sites', e.g. the City Centre in general and Nun's Island (referred to as a Masterplan Area).

In broad terms, Lidl consider that the retail potential of many of these sites has not been sufficiently considered or facilitated in the site appraisals.

As noted above, in the absence of a clear retail hierarchy, and having regard to the need to service the expected population growth, room for expansion of and a finer grain of provision of food shopping in particular is needed.

The C/I Zone in particular (which many of these locations are to be zoned as) will be significantly compromised in terms of delivering on the objectives of the retail strategy and the zoning objective strategy including: *"To provide for ... Retail of a type and of a scale appropriate to the function and character of the area."*

As noted above, a number of the 'Regeneration and Opportunities Sites' would wholly and detrimentally *interfere with the primary use of the land for CI purposes.*

There is also a disconnect in terms of the individual objectives / narratives under Sections 10.5-10.22 and the 'strategic' overview of the 'Regeneration and Opportunities Sites' designations.

The Development Plan appears to prioritise these areas for residential, employment and retail uses, however we submit that due to the restrictions and descriptions under Sections 10.5-10.22 and the C/I zoning objectives, the ability of these sites to achieve the strategic residential and retail functions is significantly undermined.

For instance, the Draft Plan states that:

***"A significant amount of the additional [housing] yield is anticipated to be delivered on the Regeneration and Opportunity Sites, all of which constitute brownfield sites located close to the city centre which can sustain in general a mix of uses with potential for high density compact growth. Notwithstanding that these are being brought forward in the current plan it is unlikely that they will all be delivered during the period of the plan.***

***Within these Regeneration and Opportunity Sites there are opportunities to enhance services and amenities by encouraging the development of a range of mixed uses, good public realm and the creation of new linkages and connections to the green network. These sites, when redeveloped with appropriate densities and high quality design, have potential to become exemplars of good urban design and placemaking and will add to the value of the neighbourhood. It is acknowledged that the established suburbs may require additional community and local services. Existing community facilities in the area will be supported where the need has been identified through a social and community infrastructure audit. It is anticipated that additional neighbourhood services will be delivered as part of the development mix on Regeneration and Opportunity Sites.***

*Additional services can also be accommodated along main roads where these can support a local catchment need or add vitality to an existing hub. Such development will be required to assimilate into the neighbourhood fabric and respect and contribute to existing amenity and character.*

*The main direction for expansion of employment will be onto designated regeneration sites, strategic business parks and on existing health and education campuses that are well aligned with the measures in the Galway Transport Strategy.*

*The regeneration areas are considered the priority areas for development in the city for retail, service retail and suitable types of commercial offices.*

*The objective for Westside is to improve connectivity, to increase attractiveness and encourage more sustainable street level community interaction and activity. This could be achieved through the re-development of identified Regeneration and Opportunity Sites, improved permeability, reduction of the "barrier effect" of the Seamus Quirke Road and requirements that re-development include for more enclosure, good use mix, use of scale and massing to create more human scaled address to public areas and in general a better urban design regime." [Our Emphasis]*

We therefore submit that the 'Regeneration and Opportunities Sites' should therefore be reconsidered and reclassified so that retail use thereon, e.g. *of a type and of a scale appropriate to the function and character of the area* is at all times allowable or open for consideration, subject to normal planning considerations.

### 2.11 Decarbonisation Zone

We also note the identification of a Decarbonisation Zone in the City.

Lidl have a well established background of being industry leaders in terms of corporate social responsibility and incorporating sustainability features into new stores and distribution centres, where they have been the first national retailer to roll out electric vehicle charging at their stores, the first to introduce extensive solar power installation projects at stores and distribution centres, and the first to introduce deposit return scheme for waste.

Lidl are also in the (planning) process of developing the Country's first Zero Carbon Store in Maynooth, in Co. Kildare, where advanced energy, construction and operational strategies have been developed to create a flagship store concept.

Lidl therefore welcome initiatives and encouragement of reductions in energy use, etc.

In terms of the Decarbonisation Zone, we submit that the designation should not represent a barrier to development that could stymie development of the areas in question, should arbitrarily increased demands and costs compared to location elsewhere in the City (or Country) arise.

As such all policies and objectives relating to the zone should be positive and proactive, and incentive based, rather than restriction or standard based.

For instance, discounted Development Contributions or Rates charges could be brought forward to encourage 'over compliance' with national building regulations and standards.

The Development Plan should also be clear in that it does not seek to supplant the primacy of national building regulations and standards.

## 2.12 Sustainable Transport and a Walkable / 15 Minute City

The Draft Development Plan makes substantial reference to sustainable and/or public transport, a 15 minute city, servicing neighbourhood needs, etc. The zoning / specific / regeneration objectives and the Retail Hierarchy do not however align with same, with limitations arising. The Draft Plan states for instance:

***"Neighbourhood Centres are identified as location for daily top up shopping, which can be accessed easily within neighbourhoods. At the lowest tiers, provision is made to facilitate local shops preferably clustered with other neighbourhood services /amenities.***

*The transport strategy for the city includes plans for high frequency bus routes that can access the existing and planned District Centres. **The roll out of investment in the network of infrastructure to increase sustainable mobility will further improve links to District and Neighbourhood Centres, combined with measures to improve permeability. Encouraging and protecting provision at the lower tiers will also support the concept of a '15-minute city' where the daily needs of communities can be accessed within a 15 minute walk, cycle or by public transport.***

***Local facilities bring residents together and reduce the need for traffic movements. The Council through policy and zoning objectives will encourage the provision of community, commercial and local employment facilities of a scale appropriate to serve the local community supporting the 15 minute city concept. The clustering of services and facilities can facilitate viability where they are within walking distance of local residents and can create a focal point for the neighbourhood.*** The range of facilities can include schools, childcare facilities, community centres, primary health care centres and local commercial services. The use of existing facilities for multifunctional uses, including for evening use, can also assist viability and add to the vitality of neighbourhoods.

### *Policy 4.2 Land Use and Transportation*

*3. Provide for the development of high volume, trip intensive, developments such as commercial centres and employment hubs at locations that will minimise the need, distance and time taken to travel and promote the use of sustainable transport modes such as walking, cycling and public transport to access these locations.*

*6. Encourage the concept of a '15 minute city' where land use policies facilitate residents to access their daily needs within a 15 minute walk or bike ride and thereby reduce the dependence on car transport.*

*There are a choice of actions which can be activated to effect travel demand patterns, the suitability of which depend on the area. These include:*

- Increase in travel by alternative modes - this includes measures to encourage public transport use, walking and cycling in preference to car use*
- **Offering alternative destinations - to encourage travel to destinations that are closer, and that lead to less overall congestion***
- **Reduction in trip length - by planning for the provision of employment, retail and other services close to where people live***

### *Policy 6.1 General policy*

*13. **Facilitate the development of the designated District, Neighbourhood and Local centres at a scale appropriate to serve the associated catchment areas** while encouraging low carbon trip patterns and contributing to achieving the benefits of the "15 minute neighbourhood concept".*

*Neighbourhood centres perform important functions in supporting communities as they are normally very accessible. They provide for 'top up shopping' for the immediate catchment and in addition to providing a service they also play a broader role in fostering community spirit.*

*They are particularly important for providing a service that is not dependant on car access and are capable of being reached on foot or by cycling within 10-15 minutes. The benefits and value of neighbourhood centres and local shops gained new appreciation during the Covid-19 pandemic restrictions on movement. The continuation of this increased patronage should be encouraged and can be enhanced through appropriate direction of public investment in amenities, improved permeability and sustainable transport modes and through the encouragement of a good mix and design quality in any new developments in the neighbourhood centres.” [Our Emphasis]*

Many of the above extracts directly support the development of a number of C/I and similarly strategically located sites across the city, however Regeneration and Opportunity Sites designations in some respects undermine or restrict the ability of such sites to provide the ‘walkable services’ to the residential catchments.

A greater balance between prioritising the provision of services and the provision of housing is therefore required in our opinion.

### 3.0 LOCATION BASED PLANNING ISSUES

#### 3.1 Westside District Centre

As suggested above, the existing District Centre designation should in our opinion remain intact, albeit with explicit confirmation that these centres are equal (or preferred) to the City Centre with regard to convenience retailing.

Therefore, the description / definition of each of the District Centre should be significantly expanded, not least in terms of the physical footprint of each centre, for instance under a dedicated land use zoning objective, or at the least a mapped boundary.

In addition, given that District Centres are centres in their own right, the ‘core’ and ‘edge’ of each should be clearly identified, to aid the determination of any proposals at each centre under the sequential approach of the Retail Planning Guidelines.

These are also explicit requirements under the *Retail Planning Guidelines* as noted above.

For example, we note that the footprint of the existing Westside District Centre is particularly unclear.

Under Section 10.24 of the Development Plan, and Figure 10.22, a boundary of the Westside area is outlined (Red Line in Figure 1 below), however this boundary is not a ‘retail’ or ‘development’ boundary and includes open space / playing fields and community facilities, whilst seemingly arbitrarily excluding other local facilities that are zoned for Community and Commercial type uses (circled in black below).

It appears that the boundary in Figure 10.9 of the existing Development Plan (similar to the Red Line in Figure 1 below) has to date been attributed as the District Centre boundary, which we consider was not necessarily intended, or appropriate. We also note the Draft Plan description of Westside, where it states *inter alia* that:

*“The area known as Westside is more established than the other two existing district centres. It has a legacy of mainly convenience floor space, with a range of local and community services and good adjacency to a number of well-developed parklands. It exhibits an area in transition from older more industrial type uses to a gradual delivery of more diversified services and facilities which can serve the local community including Shantalla, Corrib Park, Newcastle and Taylors Hill and the large workforce and students at UHG and NUI Galway.*

*It is anticipated that new developments in this area will deliver both commercial, community and residential developments in a compact, attractive format. In design, renewal will be required to rehabilitate the public realm, be of a high architectural quality, encourage and facilitate active modes and passive surveillance when combined will enable transformation of the area to become an attractive and vibrant place.*

*This area has benefited from investment in recreation facilities, access upgrades including bus lanes and cycle lanes and the designation of the main access road, Seamus Quirke Road as suitable for a rapid transit bus route. This investment will be beneficial especially on the larger opportunity sites which form part of the district centre.” [Our Emphasis]*

In particular we note the above reference to *the larger opportunity sites which form part of the district centre*. There are two Regeneration and Opportunity Sites identified in the area, the ‘Seamus Quirke Road’ and ‘Arch Motors’ site.

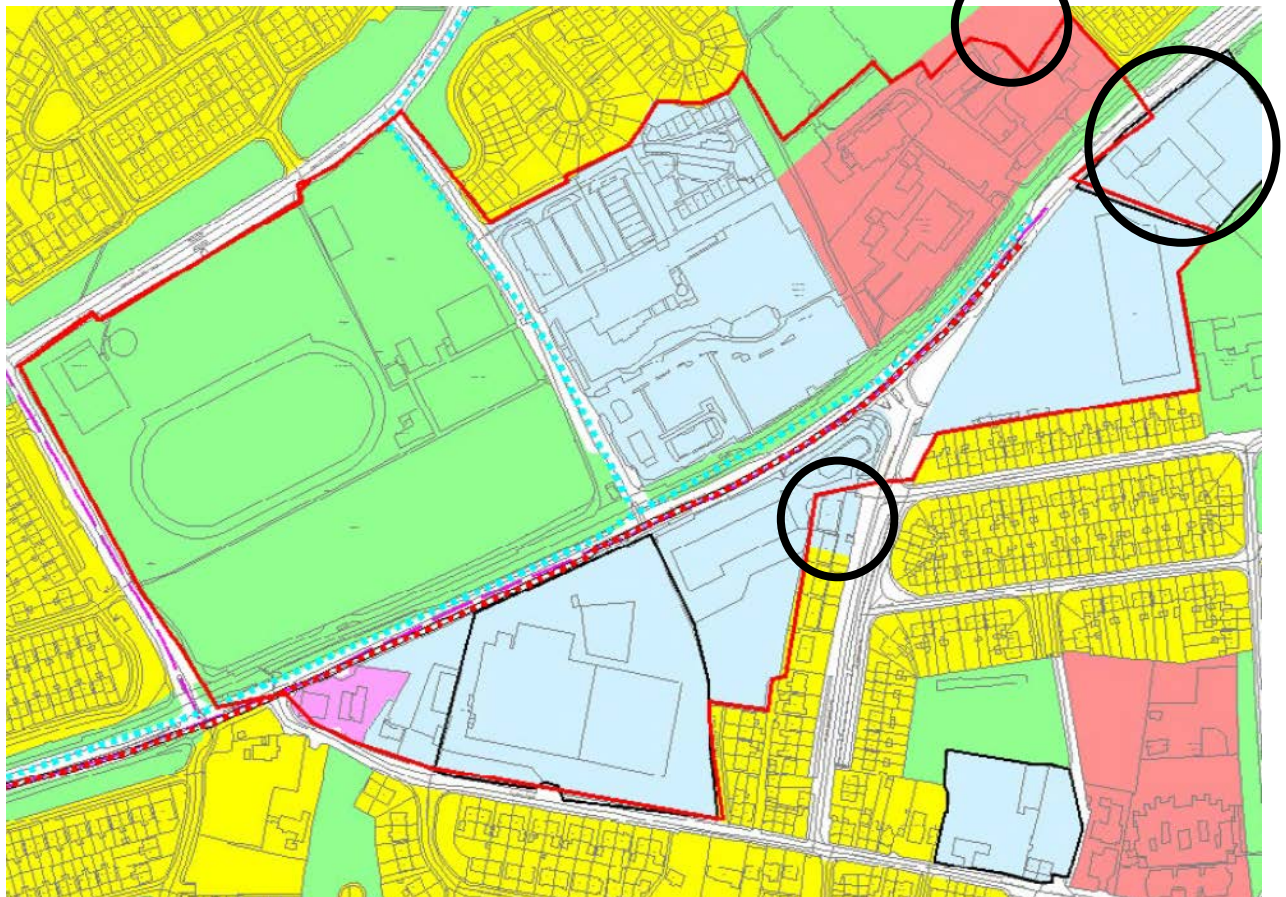
Based on the above, it would appear that both sites definitively *form part of the district centre*.

The provision of a clearly defined District Centre boundary, along with an inner core, and outer edge of centre area, would avoid any remaining lack of clarity arising in future.

The forthcoming plan has the opportunity to address this issue.

We also note that Westside is not listed under Figure 1.6, the Core Strategy Map contained in the Draft Plan, as a District Centre.

**Figure 1: Westside, Galway**



Source: Figure 10.22, Draft Galway City Development Plan 2022-2028

### 3.2 Arch Motors Site

As noted above, based on the new definition of the C/I lands along 'Seamus Quirke Road' as being the site referred to in Section 10.10 of the Development Plan, the Planning Authority are requested to specifically confirm that the reference to *local retailing needs* applies only to that site on Seamus Quirke Road, and not to the 'Arch Motors' Site.

Secondly, based on the above description of the Westside District Centre, the Planning Authority are requested to confirm that both the 'Seamus Quirke Road' and 'Arch Motors' sites are within the District Centre boundary.

In relation to the description under Section 10.15 of the Draft Development Plan, we note a number of concerns as follows:

1. The site is in active use, albeit partially unused. The opportunity / regeneration designation would stymie the repurposing of the site unless and until the existing fuel station use ceases. This is not envisaged even in the long term;
2. As such the site will likely be restricted from reasonable redevelopment, as has been Lidl's strategy on the site over the course of planning applications to date, with the former application being supported by the local Planning Authority;
3. There would be a significant opportunity cost arising from the opportunity / regeneration designation which would effectively result in the sterilisation of the unused part of the site, which would directly undermine the principle an objective of the opportunity / regeneration designation;
4. The reference to "*capacity for redevelopment for a residentially led mixed use scheme*" is wholly incompatible with the site context in our opinion, having regard to the material constraints on the site arising from proximity to the hospital complex, where a helipad is located;
5. The preservation of the adjoining site as a location for a 24/7/365 emergency and routine landing pad is a core priority for the management of the hospital, whose interests would be vindicated by any planning process for substantial residential development on the site;
6. Such development would be expected to have a relatively poor residential amenity due to significant noise and vibration and related affects, at all times of day and night, assuming that the site could be developed at all given the height restrictions necessitated (to allow for flight paths); and,
7. The Lidl proposal for the site seeks to balance the constraints and opportunities of the site, ensuring a good neighbour approach to all areas, including the hospital grounds, whilst benefiting from the strategic District Centre or edge of District Centre location, availability of public transport, a walkable residential catchment, etc.

The Planning Authority are therefore requested to remove Arch Motors from the list of Regeneration and Opportunity Sites, or alternatively to substantially modify the description / objective for the site, as follows, or a wording to a similar effect (original wording deleted ~~struck through~~, additions underlined):

*"This site of 0.84 hectare is located along the Seamus Quirke Road ~~adjacent to~~ within the Westside district centre. It has capacity for redevelopment and/or partial redevelopment for a residentially retail led mixed-use scheme, in view of the advantaged location, being proximate to key facilities encouraging linked trips, providing competition and choice, having a substantial walkable catchment, along a public transport corridor and having regard to the height and residential amenity limitations of the site due to proximity to the adjacent helipad to park facilities. Any redevelopment should ~~include for a spatial framework which will be required to include for measures to support~~ have regard to the designation of the wider area as a pilot decarbonisation zone."*

### 3.3 Doughiska Road Lidl Store

In relation to the existing Lidl store at Doughiska Road, we note the proposed preservation of the existing Residential zoning objective.

Given the extant use, and the designation of this area as a Neighbourhood Centre (boundaries undefined), we submit that the more appropriate zoning objective would be that of Commercial/Industrial / C/I, to reflect the current use and to facilitate consolidation or incremental growth in the area.

The adjoining undeveloped lands to the rear / East and South have the potential to be consolidated and enhanced for the benefit of the area in general, whilst maintaining relevant open space and buffer areas to residential development, the National Road corridor and the proposed intersection of East-West and North-South greenways.

The subject site is at a strategic location in this regard, whilst we also note objectives at "RA lands at Doughiska North of Túr Uisce" where "The Council will consider the development of part of these lands for a swimming pool/leisure centre with concessionary public use and a childcare facility, where a community facility is proposed as part of the development. This development shall not compromise the provision of a pedestrian and cycleway in this area."

The progression of those amenity facilities would further enhance the strategic location of the existing Lidl site and support a degree of consolidation or incremental growth of the facility.

**Figure 2: Doughiska Neighbourhood Centre & C/I Zone (Suggested) – Outlined in Red**



Source: Draft Galway City Development Plan

### 3.4 Corrib Great Southern Regeneration Site

In relation to the substantial brownfield opportunity at the former Corrib Great Southern Hotel site, we note the omission of the existing caveat under the current development Plan that "*retail shall be restricted to bulky goods retailing and local retailing needs.*"

This presumably facilitates the development of the site for a meaningful retail element, which should in our opinion deliver up to and including a Neighbourhood Centre scale, given the substantial resident catchment in close proximity, and also the significant trip generators in close proximity including GMIT, which would facilitate linked trips, many by sustainable means.

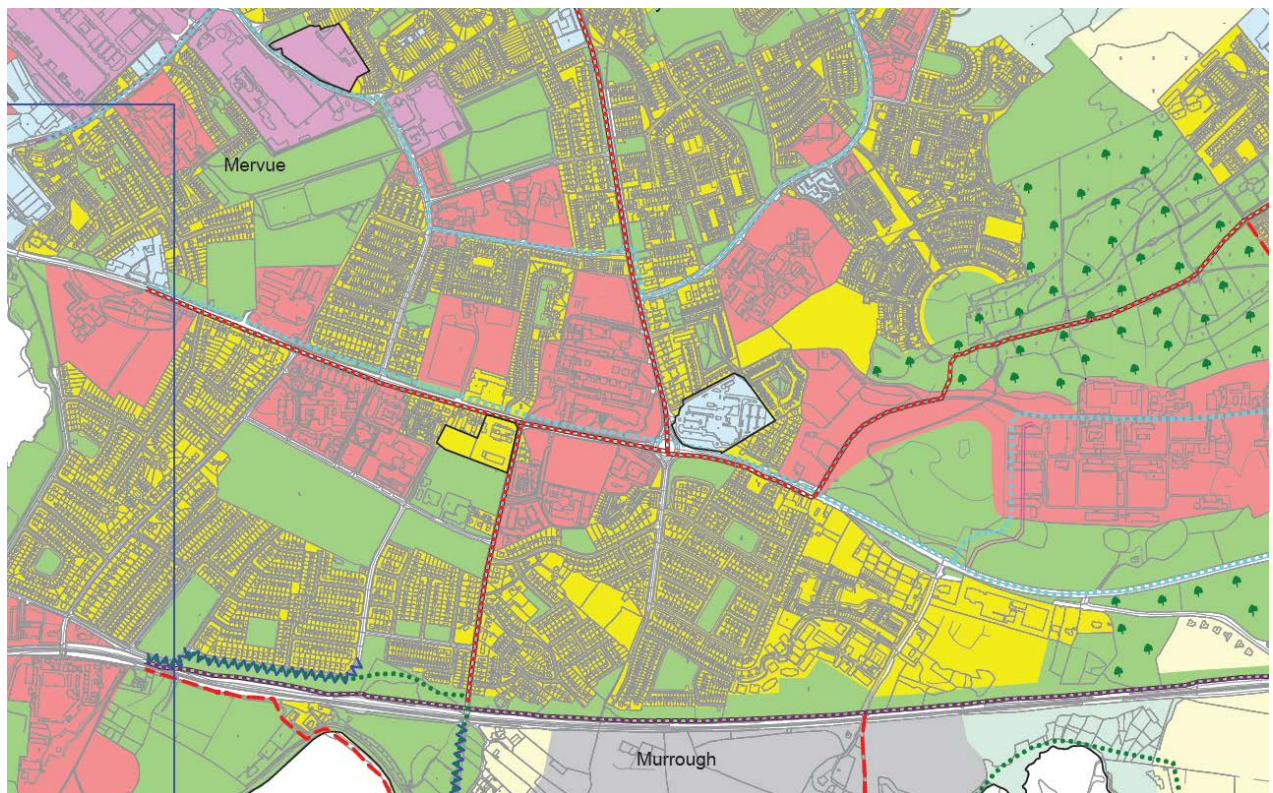
As stated in Section 2.6 above, we note the continued absence of a strictly formal Neighbourhood Centre designation, e.g. in the form of a specific zoning or mapped set of objectives.

In this regard we reiterate that to facilitate same, Local / Neighbourhood Supermarkets e.g. up to 2,500 sqm net retail sales area, should be 'permitted in principle' or 'open for consideration' under most zoning objectives, e.g. *Residential, Commercial/Industrial*, etc. This approach would be similar to well established principles / approaches in other local authority areas, for instance the Dublin Planning Authorities.

In the alternative, the Planning Authority should formally designate, and map, neighbourhood centres, and clarify the scale and type of retail allowable in such centres.

We reiterate that the current lack of clarity and wide disparity in scale and provision is in our opinion not conducive to the proper provision of retail and allied services in the city and its residential neighbourhoods.

**Figure 3: Corrib Great Southern Regeneration Site Surrounds**



Source: Draft Galway City Development Plan

### 3.5 Salthill 'Neighbourhood' or 'District'

We note that Salthill is designated as a Neighbourhood Centre (though primarily zoned Residential and C/I), with no defined boundaries to the centre.

Having regard to the significant role of Salthill in the City, whether in terms of recreational, entertainment, leisure or retail functions, we submit that the area should be elevated to District Centre status.

Such would emphasize the important role of the area, particularly in the context of the significant infill requirements of the National Planning Framework and the Regional Spatial and Economic Strategy. This will naturally result in a significant increase in the Salthill population and thus a critical mass for a District Centre designation, which should be planned for at an early stage.

In this regard we note that the Salthill area has not been identified with any Regeneration and Opportunity Sites despite a number of sites being potentially suitable for such, not least the Leisureland site and/or adjoining lands.

In our opinion there is likely to be considerable unmet demand from residents, consumers / visitors and retailers alike to expand retail and non-retail services in Salthill to that of a District Centre scale, which would be a positive addition, and should be encouraged by the Planning Authority through the designation of a clearly defined District Centre area.

The area is currently underserved in this regard despite being a well recognised and distinct community area within the city, which will be intensified significantly in the medium to long term in the context of the National Planning Framework imperatives of densification of cities and existing built up areas.

### 4.0 CONCLUSION

We trust the above proposals and suggestions will receive due consideration in the formulation of the City Development Plan and note that our client looks forward to providing further input into same should any Material Amendments be published.

Overall, we submit that the emerging City Development Plan should strongly encourage appropriate retail development throughout the City including facilitating the expansion of the convenience sector, not least in terms of the associated economic benefits and employment generation, and in terms of providing for food security / local access to foodstores.

Finally, we reiterate that a *Business as Usual* approach, which has been discarded in terms of the Core Strategy, should also be discarded in terms of the Retail Hierarchy and Strategy, where the latent and growing need for further retail facilities all across the city should be addressed proactively.

Lidl, and other food retailers, are expanding their networks representing a finer grain of distribution of stores than was the pattern heretofore, in response to an evolving retail market and the growth of the food retailers trade in general in recent years.

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