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Planning Department
 Roscommon County Council
 County Hall
 Roscommon
 F42 VR98



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Dear Sir/Madam

Re: Roscommon County Development Plan 2021-2027 – Pre-Draft Submission

This submission is made on behalf of Lidl Ireland GmbH, Head Office, Main Road, Tallaght, Dublin 24.

Lidl currently has three stores operating in a number of locations around the County including:

- Roscommon town;
- Carrick on Shannon (Co Roscommon side of the Shannon River); and
- Castlerea

These stores provide approximately 60 jobs.

It will be the intention of our client to make detailed submissions on these sites in due course. Therefore, the comments in this submission are general in nature.

The Future of Food retail

The future of food retailing is going to be in smaller store (like Lidl's offer) with a good range of day to day groceries, in a larger number of locations across the country. Traditionally, superstore and hypermarket formats, with multiple offers of food and non-food goods, under one roof, are highly dependent on the private car are becoming less competitive.

In town's like those listed above, having foodstores in suburban locations close to where people live and work, at a smaller scale and greater frequency, to encourage trips by modes other than the private car, is going to be the general structure of food retailing for the foreseeable future, in terms of new and replacement projects.

The National Framework Plan (NPF)

The NPF is the guiding document for all planning applications. Amongst the shared national goals are the following of particular relevance to food retailing.

Compact Growth

Carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential. Activating these strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.

Sustainable Mobility

In line with Ireland's Climate Change mitigation plan, we need to progressively electrify our mobility systems moving away from polluting and carbon intensive propulsion systems to new technologies such as electric vehicles and introduction of electric and hybrid traction systems for public transport fleets, such that by 2040 our cities and towns will enjoy a cleaner, quieter environment free of combustion engine driven transport systems.

What this means for the food retail sector and in particular Lidl Ireland will be:

- (1) investment in current locations to introduce more efficient buildings;
- (2) options for modes of transport other than the private car;
- (3) positioning stores to encourage people to use modes of transport other than the car.

In relation to somewhat redundant tests such as the sequential approach, which are aimed at pushing food retail and other forms of retail into town centres, we quote the Inspector in a recent case involving our client's newly permitted store at Corbally, on the fringe of Limerick City¹:

With regard to sequential assessment, I consider that what is proposed in this instance is essentially a local neighbourhood convenience type store to serve a growing suburban area in the northern environs of Limerick City. The grounds of appeal make reference to numerous other convenience stores in the vicinity of the subject site. The Board will note however that the store referred to including Supervalu, Lidl, Aldi and Dunnes Stores are all located between 3 and 5 kilometres away (with the exception of one Supervalu on the Corbally Road which is located c.2 kilometres to the south). In the context of an urban area, it cannot be considered that the sites in question can be considered proximate to the population catchment intended to be served by the proposed development. This is a particularly important consideration in my view in terms of promoting more sustainable forms of trip generation within urban areas. It is highly unlikely that the population of the Corbally area will cycle or walk to the existing convenience stores between 2 and 5 kilometres away. The provision of a local convenience store centrally located and proximate to existing retail and service outlets is likely to generate more sustainable trip generation. (Para 10.5.4 Inspector's report associated with Grant of Permission for a new Lidl store under ABP ref: 305815 on 16 July 2020).

In accepting our arguments that the identified deficiency in food retail provision, can only be addressed by having a store located within the geographic area where that deficiency exists, the Board Inspector made a direct link between that and the resulting sustainable trips and

¹ The site is located in the jurisdiction of Clare County Council on the northern fringe of the city.

also agreed with us that the sequential approach is a lesser consideration in such circumstances.

This is a key decision, based on well-established principles of compact cities, and towns and self-sufficient, local level, neighbourhoods. It is also particularly apposite to food retail which is a critical, local and community resource.

So, in as far as food retail is concerned, the sequential approach is becoming or has become much less relevant. The sequential approach (a doctrine now some 20 years old) was established long before contemporaneous policy on compact urban growth, sustainable neighbourhoods, self-sustaining towns and a rapid push towards more sustainable modes of transport. It has since been overtaken by a large suite of policy geared towards walking and cycling.

LIDL Development Programme

Lidl has been at the forefront of Irish retailing for over 20 years offering a range of food and seasonal goods at a discounted price to the consumer. One of the top food retailers in the country, Lidl Ireland has been investing heavily in a new store locations and also in its older stores.

With particular reference to the latter, the Company is investing in many locations, either repositioning older stores to more sustainable locations, within towns or carrying out “on-site” replacements, either on lands entirely inside their control or taking in additional lands outside their immediate demise.

Their new designs have a number of significant advantages over the first generation stores:

- **Generally the stores are larger in gross floorspace terms with the emphasis on providing a much better internal and external environment for shoppers and staff;**
- **New stores have more on site storage and better facilities for staff;**
- **Store designs are much more energy efficient;**
- **New stores usually have Electric Vehicle charging points and dedicated cycle parking; and,**
- **There is usually an increase in sales space of about 20% but this in the context of a modest store size is generally quite small.**

We would make the following observation on the Issues Paper in the context of food retailing:

1. Avoid inclusion of specific store size “Caps”. As retail changes and as our client invests in new stores, which in turn changes the overall shape and scale of their offer, artificial “Caps”, usually derived from pre-conceived, but outdated information, will be redundant and prevent, rather than encourage investment.
2. The existence of non-conforming, land-uses should be addressed to regularise the planning position and recognise the importance of these locations to their respective communities.
3. In the context of the sequential approach it is important to recognise that food stores of a smaller scale, like Lidl’s offer, are a very sustainable retail offer, that can contribute positively to the health and well-being of suburban communities. We would therefore ask that specific recognition is given to relaxing the test in the context of food retailing. The above decision from An Bord Pleanála provides an authority to follow on the matter.

- **Contact Details:**

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