



Planning Department,
Roscommon County Council,
Áras an Chontae,
Roscommon,
F42 VR98.

Date: 12 June, 2024
Our Ref: MN 24137

Dear Sir/Madam,

RE: SUBMISSION ON THE PROPOSED MATERIAL ALTERATIONS TO THE DRAFT ROSCOMMON TOWN LOCAL AREA PLAN 2024 - 2030

1. Introduction

On behalf of our client Aldi Stores (Ireland) Ltd, 67/68 Fitzwilliam Square Dublin, we wish to make a submission on the publication of the proposed material amendments to the draft Roscommon Town Local Area Plan 2024-2030 (the Town Plan hereafter). The publication of the plan is welcomed by our client. This submission respectfully requests that the forthcoming plan recognises, supports and provides for convenience retail uses in a sustainable retail hierarchy within Roscommon town.

2. Background

Aldi currently operates one store in Roscommon town at Centrepoint Retail Park. As part of its continued investment programme, Aldi have an objective to develop further stores within the Roscommon area.

3. Grounds of this Submission

This submission relates to **Proposed Amendment – MA 53** which states:

“Add an additional explanatory footnote no. 4 at the ‘Retail’ development type in Figure 11.1 (Roscommon Town Land Use Zoning Matrix) on page 72 of the Draft Plan as set out below and amend all subsequent footnote numbers accordingly:

Where ‘Retail’ is ‘open to consideration’ on land other than the ‘Town Core’ and the ‘Outer Core’ this refers only to (a) a small scale neighbourhood convenience store to serve the immediate surrounding area or (b) minor retail activity ancillary to and demonstrated to be necessary for the operation of an proposed or established industrial / enterprise / community facility.”

It is highlighted that the Census 2022 results showed that the population of County Roscommon grew by 9% to 70,259, an increase of 5,715 between April 2016 and April 2022. Over the same period, Ireland's population grew by 8% from 4,761,865 to 5,149,139.

The Sequential Test

It is noted that the Roscommon County Development Plan Retail Strategy 2022-2028 identifies the continuation of the '*Stay Local, Shop Local*' as a key element to maintain shoppers within the county and reduce expenditure leakage to other centres. In order to support this approach, it is essential that convenience retail shops are not restricted on other land uses zones, where retail is '*open for consideration*' and where a site is not available or suitable on '*Town Core*' or '*Outer Core*' zoned lands.

A review of the draft Town Plan (and proposed material amendments) has shown that a large number of potential opportunity sites within the town have been identified for residential development within the plan. The approach to increase residential development is recognised and supported however, it is submitted that the proposed **Amendment – MA 53** unreasonably restricts retail development potential in other areas of the town, when town centre or edge of centre sites may not be readily available or suitable. Given the population growth recorded in the county is above that recorded for the state, it is reasonable to expect an increased demand for retail services within the county.

The Retail Planning Guidelines have identified the sequential test as the appropriate method of determining the suitability of a site for retail development. In the absence of an available sequentially preferable site, it is recognised in the guidelines that another option may be considered. In the case of Roscommon Town, a significant portion of the available '*town core*' or '*outer core*' sites have been identified for residential use. Therefore, it is respectfully submitted that the proposed footnote in proposed material amendment MA 53, should be removed due to its restrictive nature, and to allow for an appropriate quantum of convenience floorspace to be provided within the town. This will assist in ensuring that the '*Stay Local, Shop Local*' strategy can be achieved. There may be opportunity (where the sequential test has been appropriately applied) to provide appropriately sized convenience retail uses on other land use zones where retail is '*open for consideration*'.

Convenience Stores

In addition, this submission respectfully requests that the new Town Plan recognises the important role that supermarkets have to play in serving new communities and employment areas. It is long established in proper planning and development that appropriate shops and services should be provided proximate to residential developments to create, build and sustain true residential neighbourhoods and communities.

Whilst it is recognised that residential zoned lands are primarily intended for residential accommodation, these lands may also include other uses that would support the establishment of residential communities. This could include community, recreational and local shopping facilities. It is also acknowledged that these facilities must be at an appropriate scale and cannot interfere with the primary residential use of the land or the retail hierarchy and town centre.

In this respect, we refer to the 2012 Retail Planning Guidelines which clearly recognise the function of neighbourhood shops in suburban areas. Section 2.2.6 of the Guidelines states that: "*shopping at the most local level is provided by a mixture of neighbourhood shops in suburban areas and village stores/post-offices in rural areas*".



In terms of a definition of a local centre of neighbourhood centre, the Guidelines state that these “*comprise a small group of shops, typically comprising newsagent, small supermarket/general grocery store, sub-post office and other small shops of a local nature serving a small, localised catchment population*”. It is clearly stated in the Guidelines that there will be no distinction between a discount foodstore use and other convenience stores.

It is respectfully suggested that, in order to ensure there is an appropriate quantum of land available to provide for convenience retail uses in Roscommon Town, the proposed footnote is removed from the Town Plan and that any proposed retail developments are assessed in accordance with the criteria set out in the Roscommon Retail Strategy and the Retail Planning Guidelines.

4. Conclusion and Recommendation

This submission respectfully requests that the Roscommon Town Local Area Plan 2024-2030 recognises and supports the provision of appropriately zoned lands to accommodate convenience retail uses within Roscommon Town. The 2022 census results have shown significant growth within the county and it is essential that the LAP provides for retail uses on the zoned lands within the town.

Due to the restrictive nature of Amendment – MA 53, it is respectfully requested that the footnote is removed from the final Roscommon Town LAP 2024-2030. We trust the above will be taken into account in the final LAP for Roscommon Town.

Yours sincerely,



John Spain
Managing Director John Spain Associates Ltd.

