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Draft Offaly County Development Plan 2021-2027 – Issues Paper

A Chara

RGDATA is the representative association for independent family grocers in Ireland. It represents supermarkets, convenience stores, forecourt stores and local shops some of which are aligned to various symbol groups and some which operate under their own family name. The independent sector represents about 34% of the Irish grocery market and members' shops are located in towns, villages and urban areas.

RGDATA represents the owners of many shops, supermarkets, convenience stores and forecourt stores throughout Offaly. Our members have a keen interest in supporting their local economy and in ensuring that the towns, villages and urban centres throughout Offaly are vibrant and attractive places to live, work, shop and to do business.

RGDATA supports sustainable retail development, vibrant town centres, villages and communities and a diversity of shops that people can walk to. RGDATA has been to the fore in advocating a planned approach to retail developments in Ireland based on the principles of sustainable development. RGDATA strongly supports the Retail Shopping Directive introduced in 1998 and has been a firm advocate of the Retail Planning Guidelines introduced by the Minister for the Environment and Local Government in 2001 and updated in 2012.

RGDATA wishes to make the following points:

The Issues Paper asks:

What Type and Scale of Retail Opportunities Should be Provided and Where are They Best Located?

Town Health Checks / Sustainable Development:

RGDATA respectfully suggests that in order to ensure sustainable retail development and promote the vibrancy and vitality of Town Centres in the Offaly County Development Plan 2017-2023, it should state that no new retail developments should be approved until Town Centre Health Checks are undertaken in key towns in the county.

A Town Centre Health Check will identify the key data about the town and assist the Local Authority in identifying exactly what new development is required, what is in the best interests of promoting a good retail mix, what will best service the actual population of the town, ensure the vibrancy and vitality of the town centre and provide sustainable development.

Section 5.3.6 of the current Offaly County Development Plan 2014-2020 'Encouraging the improvement of Town Centres' discusses the decline of the town centres and outlines in Section 5.4.1. their Town Centre Strategy approach. They are informed by the provisions of the Retail Planning Guidelines regarding the maintenance of the vitality and viability of town centres. RGDATA welcomes this approach.

The Retail Planning Guidelines 2012 include an Appendix on Town Centre Strategy which states:

Such a strategy will generally contain:

- *a profile of the city or town centre, which will identify the essential qualities of the centre and seek to ensure that it continues to meet the needs of the community it serves by consolidating and building on its existing strengths;*
- *a 'visioning' statement, where a shared vision is drawn up and a strategy and action plan for the centre are then prepared to implement the statement;*
- *implementation proposals, which can range from the strategic to the specific, indicating responsibilities and delivery timetables; and*
- *provisions for monitoring and review, to ensure that the appropriate actions are being progressed and that changing circumstances are considered.*

“The city/town centre strategy will generally be prepared by the planning authority in liaison with stakeholders such as retailers, customers, chambers of commerce, and community groups. This liaison should continue through the various stages of the implementation of the centre strategy.

While the strategy can be done at any time it is probably best done either in parallel with the development plan process or just before the process begins so that it can inform the policies and objectives of the development plan, if resources permit”

Vacancy:

Offaly County Council should commit to applying the strict interpretations contained in the Retail Planning Guidelines, to ensure that there is a vibrant, efficient and competitive retail sector, vibrant towns and villages and local shops that people can walk to. The focal point for residents in any community and surrounding hinterlands is the core of the town centre.

RGDATA urges that vacant sites in towns and villages are fully investigated for reuse and that developers with new retail proposals are directed to design their proposed plans to fit into the existing retail zones, town centres and villages in a manner that will enhance their role as centres, their economic performance, retain existing jobs and facilitate the creation of new jobs. The Authority should use its powers actively to resist proposed developments that do not deliver on these criteria and encourage developers to redesign or relocate proposed developments so that they enhance the existing centres and do not create a counter attraction depleting the existing centres and creating a net loss of jobs in the area.

Retail Hierarchy:

RGDATA wish to emphasise the importance of confirming the retail hierarchy and role of centres, when assessing planning proposals and developments. We ask that Offaly County Council, when dealing with these matters should take account of the views of retailers, shoppers and property owners.

Village shops and Local / Neighbourhood Centres:

The level of retail provided in villages and neighbourhood centres should relate to the local area and the Council should ensure that villages retain their self-sufficiency and neighbourhood centres retain their community status. Village shops and neighbourhood centres are supposed to service the local catchment area and not create a counter attraction to the existing town centres.

Annex I.5 of the Retail Planning Guidelines 2012 state:

Local Centre or Neighbourhood Centre:

“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”.

RGDATA would have concerns that over development of local or neighbourhood centres would result in drawing business away from nearby towns, which are already experiencing high vacancy rates and loss of footfall.

Parking

We are aware of the challenges many town centres face with restrictive parking regimes and we ask Offaly County Council to address this issue as you continue the process of reviewing the County Development Plan. In recent years pay parking and high fines for clamping have been introduced in town centres, while free parking is available in out of town developments. This has been found to be prohibitive and acts as a disincentive for consumers to shop in the town centres. Consumers increasingly opt to avail of the free parking in out of town retail centres.

We ask for a fair and equitable balance to be achieved for the future protection of the town centres.

Land Use Zoning:

Land use zoning policies should ensure that lands zoned for general employment should be reserved for projects that will generate local jobs, support Irish producers and suppliers, provide a route to market for small local producers and farmers and create opportunities for reinvestment in the local community.

The County Council should make a specific commitment in this plan that retail warehousing should be accommodated only on lands specifically zoned for such purposes.

RGDATA also asks that when assessing new proposed retail developments in Retail Parks, that they are restricted to the sale of bulky goods only as stated in the Retail Planning Guidelines 2012:

Retail Parks:


‘A single development of a least three retail warehouses with associated car parking’

Retail Warehouse:

'A large single-level store specialising in the sale of bulky household goods such as carpets, furniture and electrical goods, and bulky DIY items, catering mainly for car- borne customers'

I trust you take our comments on board as you continue to make the Offaly County Development Plan 2021-2027.

Yours sincerely



TARA BUCKLEY
DIRECTOR GENERAL