

Forward/Strategic Planning,  
Economic Development Directorate,  
Limerick City and County Council,  
Merchants Quay,  
Limerick

Via email: [devplan@limerick.ie](mailto:devplan@limerick.ie)

Date: 3<sup>rd</sup> September 2021

Dear Sir/Madam

**RE: SUBMISSION IN RESPECT OF THE DRAFT LIMERICK DEVELOPMENT PLAN 2022-2028**

**1. Introduction**

- 1.1. On the 26<sup>th</sup> of June 2021 Limerick City & County Council (Limerick CCC) published the draft Limerick Development Plan 2022 – 2028 (the draft Plan). On behalf of our client, Aldi Stores (Ireland) Ltd, we wish to make a submission in response to the publication of the draft Plan.
- 1.2. Aldi has been actively seeking to develop additional stores to serve the city for the past 15 years. Aldi's existing stores in Limerick City are located at the Dublin Road near the Parkway Centre, and at Roxborough. A further store exists at the Newcastle West town centre. Aldi has also recently secured planning permission for a new store within the city centre on Roches Street.
- 1.3. Aldi is seeking to provide additional stores within the south and north of the city in order to help meet convenience retail needs in these areas, where there is an identified shortfall in provision and lack of consumer choice.
- 1.4. At the outset, Aldi welcome the preparation of a new plan and the accompanying draft Retail Strategy. However, there are a number of amendments sought in order to provide for the development of additional stores in the city.

**2. Local Centres**

- 2.1 It is noted that discount foodstores/small supermarkets are complementary to local scale convenience stores. It is likely that an Aldi store at a local centre would bring significant benefits to existing shops and services, providing a popular retail anchor.
- 2.2 We also note that it is well established that small supermarkets / discount foodstores are appropriate in local centres in large urban areas throughout the country. There

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are numerous examples nationwide of discount foodstores in local centres in urban areas.

- 2.3 A conflict has been identified between the newly published Southern Environs LAP and the draft plan. An Aldi discount foodstore would be classified as “*Retail – Convenience*” under the Southern Environs LAP 2021-2027 land-use zoning matrix. The matrix states that “*Retail – Convenience*” would be “generally permitted” in “*Local Centre*” land-use zonings.
- 2.4 An Aldi discount foodstore would be classified as “*Retail – Convenience*” under the draft plan land-use zoning matrix within the comparable “*Local/Neighbourhood Area*” land-use zone.
- 2.5 In contrast, the land-use matrix within the draft plan notes that convenience retail with a net floor area of >1,800 sq.m. is “*generally not permitted*” in such zoned lands, while a convenience retail store with a net floor space of <1,800 sq.m. would be “*open for consideration*”.
- 2.6 As such, it is respectfully requested that the draft plan be amended to reflect the newly published Southern Environs LAP 2021-2027 which identifies ‘retail convenience’ as generally permitted in a local centre. For consistency, it is requested that a convenience retail store with a net floor space of <1,800 sq.m. be “*generally permitted*” within the “*Local/Neighbourhood Area*” land-use zone.

### **3. Retail Strategy**

- 3.1. Aldi welcome the publication of the draft Retail Strategy which will replace the current outdated strategy. The findings of the strategy and the acknowledgement of the need to provide for additional convenience retail floorspace is supported by Aldi, however, it is respectfully submitted that the quantum of additional floor space identified falls short of that needed in the city.
- 3.2. Significantly, we note that Shannon town has been included in the Retail Strategy. The draft Shannon Town Centre Masterplan is currently on display for public consultation and appears to include a significant retail offering. It should be explicitly recognised that Limerick City and Shannon have different catchments with no overlap of convenience retail catchments. Particularly, any additional retailing in Shannon should not have an impact on retail in Limerick City.
- 3.3. We refer to Chapter 2 of the draft Plan and Table 2.2 which identifies a projected increase of 30,106 people within the city during the lifetime of the plan (up to 2028).
- 3.4. It is considered that there is a significant gap existing in the convenience retail provision in the city, predominantly driven through a combination of the existing exclusivity clauses at district centres and narrowly defined local and neighbourhood centres under the provisions of the current development plan 2010-2016. In this respect, Aldi welcomes the provisions of the new draft plan and acknowledges the changes therein.
- 3.5. However, there is a risk that identified 4,845sqm of convenience retail floor space is not sufficient to meet demand up to 2024, particularly when Shannon town is included in the same catchment as Limerick City where a significant deficit in convenience retail provision exists. Therefore, it should be clarified that this figure is a guidance only and it is not intended as a ‘cap’ on retail floorspace.

- 3.6. It is respectively suggested that the new Retail Strategy provides a more flexible approach to the quantum of convenience retail provision allowable, bringing forward some of the capacity available up to 2026. This would assist in providing the planning controls needed to encourage growth in the convenience retail sector.
- 3.7. We particularly refer to the recent change in consumer habits following the pandemic and the move towards online shopping. Aldi stores have remained as a consistent street presence during this time and will continue to do so, activating neighbourhoods and drawing consumers to the area.
- 3.8. In this regard, we respectfully request that the draft Retail Strategy is reconsidered in the context of the necessity to include Shannon in the quantum of available retail floorspace for Limerick City. Shannon town should be separated from Limerick City in terms of retail provision.
- 3.9. The identified 4,845sqm convenience retail floorspace capacity up to 2024 should be a guidance figure only and it should be clearly stated that it is not intended as a cap. Individual proposals in appropriate locations should be considered on their merits in the context of the retail strategy.
- 3.10. The subject draft plan presents an opportunity to provide for a new Aldi store with the right policies in place to enable this. Typically, an Aldi store involves investment in the region of €5m to €10m and employs in the region of 30 people representing a significant investment and employment opportunity for the city which is relevant in the current retail climate.
- 3.11. We thank you for the opportunity to make this submission and should you have any queries please do not hesitate to contact us.

Yours faithfully,



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**John Spain Associates**