



Planning Department
Clare County Council
New Road
Ennis
Co. Clare



Our Ref: 200206a
Your Ref:

12th November 2020

Re: Submission on Stage 1 ('Pre-Draft') of the Clare County Development Plan 2022-2028 – Retail Hierarchy

Dear Sir/Madam,

We wish to make a submission on the Stage 1 ('Pre-Draft') of the Clare County Development Plan 2022-2028. This submission relates to the Retail Hierarchy identified in the current Clare County Development Plan 2017-2023 and ensuring that the new Development Plan incorporates an appropriate retail hierarchy in line with the provision of the Retail Planning Guidelines 2012.

It is noted that the operative County Development Plan (CDP) outlines the following retail hierarchy within the County:

- *Hub Town/County Town - Ennis*
- *Linked Gateway – Shannon*
- *Service Towns – Ennistymon, Lahinch, Kilrush, Scarriff/Tuamgraney*
- *Small Towns*
- *Large Villages*
- *Small Villages*
- *The Countryside*

The hierarchy above does not include for the designated '*Neighbourhood Centres*' in Ennis as identified in the CDP. These '*Neighbourhood Centres*' are:

- Cahircalla COM 6
- Clonroad More COM 9a
- Claireen COM 5
- Roslevan
- Lifford (Shiels's Gort Road)

The Retail Planning Guidelines 2012 (RPG's) identify the Retail Hierarchy as being:

'A ranking given by the planning authority to the range and quantity of retailing appropriate to a settlement as dictated by its role in the settlement hierarchy.'

Section 4.11.6 of the RPG's state the following in respect of '*Neighbourhood Centres*':



*'Local retail units such as corner shops or shops located in local or **neighbourhood centres** serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport.'*

The RPG's clearly note the importance of this type of retailing activity and direct planning authorities to ensure that such areas are zoned appropriately and that development management decisions support the provision of this type of development.

It is considered that the omission of the '*Neighbourhood Centres*' from the retail hierarchy in the CDP undermines their importance in the context of the nature and type of retailing that is required in a large urban centre, outside of the traditional retail core. Indeed, the '*Neighbourhood Centres*' in Ennis incorporate catchments of thousands of people. The inclusion of these Centres in the Retail Hierarchy would enshrine their role within the new CDP and ensure that development management decisions can be made in line with the provisions of the RPG's. Their continued absence from the hierarchy may cause difficulties in future in terms of the sequential approach to new retail development particularly given that these '*Neighbourhood Centres*' are typically found in 'out of centre' locations.

We note, as an example, that Table 6.2 of the Galway City Development Plan 2017-2023, includes the following retail hierarchy:

Table 6.2 Galway City and County Retail Hierarchy

Level 1	Major Town Centre	Galway City Centre
Level 2	County Towns	Tuam, Loughrea, Ballinasloe
Level 3	District Centres	Doughiska, Knocknacarra, Westside, Ardaun
Level 4	Sub County Towns	Key Towns in Galway County Settlement Hierarchy
Level 5	Village /Neighbourhood Centre	Neighbourhood & Local Centres in the City; Other lower tier settlements in the County
Level 6	Corner/Local shops	Rural Villages; Residential Neighbourhoods in the City

It should be noted that the '*Neighbourhood Centres*', in this instance, are specifically designated on the hierarchy which we consider to represent an appropriate interpretation of the provisions of the Retail Planning Guidelines. We respectfully request that the Draft Clare County Development Plan 2022-2028 include the '*Neighbourhood Centres*' outlined above in its Retail Hierarchy.

We trust that the matters set out above will be taken into due consideration in the preparation of the Draft Development Plan. Should you require any further information in respect of this submission please do not hesitate to contact this office.

Yours sincerely,



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