

Draft Longford Town Local Area Plan,
Administrative Officer,
Forward Planning,
Planning Department,
Longford County Council,
Áras an Chontae,
Great Water Street,
Longford, N39 NH56

Date: 18th October 2024

JSA Ref: 24304/IL

Dear Sir/Madam,

RE: SUBMISSION ON THE DRAFT LONGFORD TOWN LOCAL AREA PLAN 2025-2031 ON BEHALF OF ALDI STORES (IRELAND) LIMITED.

1.0 Introduction

- 1.1 On behalf of our client, Aldi Stores (Ireland) Ltd., Newbridge Road, Naas, Co. Kildare we wish to make a submission on the draft Longford Town Local Area Plan (LAP) consultation.
- 1.2 We welcome the opportunity to make a submission at the draft stage of the LAP process and look forward to working with the Planning Authority to ensure that convenience retail provision and choice is provided to the local community and Longford Town as a 'Key Town' in County Longford as identified by the Regional Spatial & Economic Strategy for the Eastern & Midland Region and the Longford County Development Plan 2021-2027. The draft LAP confirms that Longford Town is *"identified as the settlement targeted for the most growth in the County over the Plan period"*.
- 1.3 The purpose of this submission is to respectfully request that the appropriate planning policy framework is provided in the forthcoming Longford Town Local Area Plan to facilitate Aldi in achieving its objective of developing an additional discount food store to serve the Local Area Plan area and the surrounding rural area.
- 1.4 Aldi currently have over 160 stores in Ireland, including an existing store at Killashee Road in Longford Town, with a number of other stores either under construction or at planning stage across the country. Aldi seek provision within the LAP to accommodate an additional Aldi store to meet identified need, having regard to the strong trading environment experienced in the area at the current stores. It is considered that given the recent c. 9.4% increase in population of the area in the 6 year period to 2022 (above the national average), the LAP lands can accommodate an additional discount food store to expand the variety and choice for local residents and increase competition in the local area.

- 1.5 This is particularly relevant in the eastern part of the LAP area which sets out additional residential land use zonings alongside significant areas of industrial/commercial/warehousing and social/community/education/public utility land use zonings around Ballinalee Road and the N4. This area provides the opportunity for accommodation of an additional Aldi store to serve the immediate residential population as well as residents within the surrounding rural areas to the north and east of Longford Town.

2.0 Town Profile & Socio-Economic Context

- 2.1 Section 3 of LAP relates to the Town Profile and Socio-Economic Context. This sets out Longford's role in the county and notes this as the *"dominant settlement in the County in terms of population, economic activity, level of service and infrastructure and connectivity"* and *"a settlement of regional importance"* which provides a service to its residents *"as well as those of its hinterland"*. The LAP states that the Plan *"aims to build upon this role"*.
- 2.2 Section 3.3.4.2 of the draft LAP notes that Employment levels in Longford Town were *"marginally lower than the County average (48.4%), and also lower than the national average (53.4%)"*, indicating the requirement for additional investment into the settlement and the creation of jobs. An additional Aldi store would bring both elements and assist in increasing the rate of employment in the town. In this respect, Aldi is supportive of Strategic Aim 3 of the draft LAP relating to Economic Development:

Strategic Aim:

to encourage sustainable employment growth and economic activity and promote Longford as a local and regional centre of trade, business and tourism.

3.0 Core Strategy & Population

- 3.1 The Core Strategy of the current Longford CDP 2021-2027 is a key consideration in the projected growth of the LAP area over the plan period up to 2031. The Core Strategy notes that it is closely aligned with the growth strategy in the National Planning Framework (NPF) and Regional Spatial and Economic Strategy for the Eastern and Midlands Region (RSES), which prioritises growth in the higher tier settlements and identifies the opportunity for Longford Town as a Key Town at Tier 1 of the settlement hierarchy, described as:

"Large economically active service and / or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Drivers."

- 3.2 The Core Strategy Map from the draft LAP is indicated below, highlighting Longford Town's Key Town status in the context of the county.



- 3.3 The draft LAP seeks to reinforce the key functions of the to “ensure that Longford Town fulfils its defined role as a designated ‘Key Town’ as an economically active service town providing employment for its surrounding area... reinforced by the associated housing and retail strategies that prioritise development in Longford Town”.
- 3.4 In terms of population growth the draft LAP states that “Longford Town is identified as the settlement targeted for the most growth over the Plan period” with “population growth target for the town is to grow by 2,502 persons, to a population of 12,510 people by 2027 in the Longford County Development Plan 2021-2027”.
- 3.5 The draft LAP is required to align with the population growth requirements set out in the Core Strategy of the County Development Plan, with an additional 1,558 persons in the CDP period to 2027. The draft LAP covers the period 2025-2031 and will need to be updated following the review of the County Development Plan in 2028 to reflect the population growth targets over the next Plan period. Notwithstanding this, the draft LAP should anticipate further growth on the basis of the CDP Core Strategy in combination with latest Census 2022 data, which indicates a c. 9.4% population increase during the intercensal period to 2022, above the national average.

- 3.6 The relevant extract of the Longford CDP Core Strategy table is included below, setting out the population target up to 2027.

Hierarchy Tier & Density	Pop. 2016	Pop. Grown to 2027	Pop. 2027	New HST (Housing Supply Targets) Units 2021-2027	30% of Required Res. Units within Existing settlement	Land Required for New Res. Units	Land Zoned for new Res. Units	Land Zoned within existing settlement (Brownfield Infill)	Potential Units that can be delivered within existing settlement (Brownfield/ Infill)	Housing Yield – 'Other Lands' ²	Potential no. of units ³
Key Town (35-40 units / ha.)	10,008	+2,502	12,510	1,304	391	34.77 ha.	35.33 ha.	35.33 ha.	1,304	105.91 ha.	0

- 3.7 This increase in population will require commensurate increases in retail provision over the same period and beyond to ensure a healthy retail environment is provided in the town.

- 3.8 Aldi is supportive of the following Core Strategy policies set out in the draft LAP:

CS 07 Encourage the appropriate redevelopment of brownfield and infill sites for residential and mixed uses within the existing built-up footprint of Longford Town.

CS 10 Focus new enterprise development into lands identified for Industry and Warehousing and Enterprise and Employment uses.

CS 11 Support new residential development and infill development that occurs in tandem with the delivery of supporting physical and social infrastructure.

- 3.9 Aldi are supportive of the draft Plan's policies and zonings for a mix of uses within the eastern part of the LAP area and the provision of the zoning matrix to accommodate retail within residential and industrial/commercial zoned lands. This will enable additional convenience retail to come forward alongside new residential and other mixed use development in the area and help to serve the existing and future populations as well as the surrounding rural areas to the east and north of the town.

4.0 Economic Development & Retail

- 4.1 Aldi is supportive of the draft Longford Town LAP strategic aim in respect of economic development, replicated below.

Strategic Aim:

to encourage employment growth and economic activity and promote Longford as a local and regional centre of trade, business and tourism.

- 4.2 The RSES sets out an important role for Longford Town at Regional Policy Objective 4.63 which seeks to:

“Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; M4/N4 Dublin/Sligo and N5; due to its proximity to the regional growth centre of Athlone; and support its role as a strategic employment centre”.

- 4.3 The draft LAP notes that the town therefore has an *“elevation economic role in the County as a regionally strategic employment centre and in effect a regional driver”* supporting Athlone. The settlement is noted to possess a strong economic and employment base, with a net inflow of workers into the town focused on sectors such as advanced manufacturing, pharma and agrifood. The ‘Key Town’ designation at a regional level and ‘Primary Economic Growth Town’ on a county level is also reflective of the substantial retail and administrative functions in the settlement. The draft LAP notes a total of 197 ha of land zoned for employment purposes in Longford Town, of which Aldi is supportive.
- 4.4 In particular, Aldi welcomes the allocation of employment lands comprising of industrial and enterprise which are primarily located on the edge of the town. The advancement of these developments in tandem with zoned residential areas will facilitate enhanced accessibility for future residents. This is particularly relevant on the eastern edge of the town where an additional Aldi store can be accommodated.
- 4.5 In respect of Retail, the draft LAP notes Longford Town’s definition as a Level 3 Settlement in the Retail Planning Guidelines 2012 providing retail support at a sub-regional level. The town is also noted as a Level 2 County Town in the RSES. In this regard Aldi is welcomes the draft Plan’s statement that:

“it is vital that Longford Town, as the County’s principal urban centre continues to develop its retail function to meet expanding shopping needs and to ensure a healthy and competitive retail environment.”

- 4.6 Notably, the draft LAP sets out commentary in relation to District Shopping Centres at Section 7.6.3.4.2 and notes that *“Longford Town is identified as being the only location within the County suitable for the provision of District Centres for the purpose of providing retailing and amenities to serve its catchment population”* and that District Centres shall be restricted to the settlement. This provides the opportunity to introduce District Centre zonings at appropriate locations, such as the eastern edge of the settlement. This area around the Ballinalee Road west of the N4 is currently zoned in the draft Plan for a mix of residential, industrial/commercial and social infrastructure. The provision of a District Centre in this area would enable the provision of a centralised mixed use area which can provide for convenience retail to serve the surrounding existing and future residential population at an accessible location to the rural area outside the LAP boundary. This can also facilitate ‘Retail Convenience’ as a ‘Permissible’ use on District Centre lands to complement the existing retail uses within the town centre area whilst catering appropriately for the growth in population and other commercial and social infrastructure uses at the eastern edge of the settlement.
- 4.7 **On this basis, Aldi respectfully requests the introduction of a District Centre zoning within the eastern environs of the LAP area to facilitate additional convenience retail commensurate with growing residential population in the settlement and surrounding areas.**

- 4.8 Potential locations for District Centre zoning include existing Strategic Reserve and Industrial/Commercial/Warehousing zoned lands around the Ballinalee Road on the eastern side of the town. This area is located adjacent to existing residential development and lands zoned for a mix of uses and benefit from good levels of accessibility by the existing pedestrian and road network and will see further improvements through the F17 Footpath Improvements at N63 Ballinalee Road and Pedestrian Crossing Updates set out at Section 14.4.1.1 and Section 14.4.1.2 of the draft LAP. It is noted that a Cycle Route Scheme on the N63 is currently at Construction Stage.
- 4.9 In addition, Aldi seek the following additional text to Policy RET 05:
- “RET 05 Support retail development which is of an appropriate size, scale and type to a town centre location in Longford Town’s core shopping area, and at other appropriate locations within the LAP boundary to meet the needs of the existing and future resident population and that of the surrounding areas”.***
- 4.10 This will facilitate and promote appropriate additional convenience retail at appropriate locations in close proximity to existing residential development and lands zoned for residential and commercial uses. The proposed amendment to Policy RET 05 would also provide for retail use on any District Centre and other zoned lands where Retail Convenience is currently ‘Open for Consideration’,
- 4.11 An additional Aldi store in the LAP area can contribute to creating additional employment in Longford Town and will assist in ensuring *“that Longford Town, as the County’s principal urban centre continues to develop its retail function to meet expanding shopping needs and to ensure a healthy and competitive retail environment”*. An Aldi store (c. 1,315 sqm net) will also contribute to meeting the guide requirements for additional convenience retail floor space as set out at Table 8.7 of the Longford CDP 2021-2027:

Table 8.7: Summary of Additional Floorspace Requirements 2021-2027

Retail Category	Floorspace (sqm)
Additional Convenience	2,100 – 3,200
Additional Comparison	2,000 – 2,650
Additional Bulky	2,200 – 4,850

- 4.12 The Retail Strategy (June 2021) set out in the Longford CDP 2021-2028 confirms that *“Since 2013, only 246.5 square metres of additional retail floorspace has been built”*. It is noted that planning permission was granted for a substantial redevelopment of the existing Tesco site Longford Town in 2010, however this permission subsequently expired in 2017 without any development taking place. This highlights the requirement for additional convenience retail commensurate with population growth of the County and Longford Town. This will assist in preventing expenditure leakage to other counties, identified as an issue in the Retail Strategy.

- 4.13 The draft LAP reflects the Core Strategy of the CDP which projects an additional 2,502 population in Longford Town between 2016 and 2027, with a growth of 944 observed in the intercensal period to 2022. This leaves a potential 1,558 in additional population in the LAP area up to 2027 which has not been catered for given the extremely low 246.5 sqm of additional retail floorspace in the county between 2013 and 2021. It is noted that the revised population growth targets in the revised National Planning Framework, due for publication in October 2024, will likely have an impact on core strategy projections, with current targets being significantly increased having regard to recent research by ESRI and the Housing Commission.
- 4.14 Based on the Retail Strategy, there will be a total convenience spend of €173,653,421 available in 2027 within the county, equating to €4,213 per capita. In the context of Longford Town, the increased population of 944 between 2016 and 2022 will have contributed an additional c. €3,540,000 to the available expenditure in the area (based on the 2019 convenience per capita spend set out in Table 4.3 of the Retail Strategy), with a nominal quantum of retail floorspace provided to meet the needs of this additional population. By 2027, this has the potential to grow to provide an additional €10,540,926 of convenience per capita spend. It is therefore essential that provision is made within the Longford Town LAP to accommodate additional convenience retail needs from a continuously growing population.
- 4.15 While Aldi's preferred location for stores is within the town centre, currently vacant brownfield lands and opportunity sites identified in the draft LAP are of insufficient size to accommodate a discount food store and have other constraints in respect of access, existing buildings and shape. It is also clear that Longford Town can accommodate an additional medium sized supermarket at the eastern portion of the LAP area having regard to the existing residential population and mixed use zonings in the area as well as its accessibility having regard to the local road network and the surrounding rural area. The town centre accommodates a number of established retailers and in this respect, an additional Aldi store at an edge of town location could be provided by the LAP framework through appropriate zoning without having an adverse impact on the vitality and viability of the town centre.

5.0 Summary & Recommendation

- 5.1 Aldi Stores (Ireland) Limited respectfully submits in response to the draft Plan that sufficient provision is made within the adopted Longford Town LAP 2025-2031 for convenience retail commensurate with population growth in the settlement over the Plan period.
- 5.2 As described above, the strong population growth c. 9.4% in the intercensal period to 2022 contributed an additional 944 additional people to the area. It is noted that the Longford CDP sets a target population of 12,510 by 2027, this population threshold may be exceeded having regard to the anticipated additional population growth assigned to the Eastern & Midlands Region to be set out in the forthcoming revised National Planning Framework expected to be published in October 2024. Therefore, these projections will be required to be recalibrated having regard to the population growth figures and those set out in the NPF.
- 5.3 This increase in population in the area requires a commensurate growth in the provision of convenience retail to meet demand, utilise the conservative total of c. €10.5 million of additional available expenditure in the area up to 2027 and beyond

and assist in preventing leakage to other locations. Aldi currently trade from a single store in Longford Town and have experienced a strong trading environment and high levels of demand in recent years, reflective of the population increase and need for additional retail floor space in the area. This has been constrained further by the c. 246 sqm of additional retail floorspace observed by the Retail Strategy in the period 2013 to 2021 which is wholly inadequate to serve the increased population growth in the county and Longford Town in the Plan period.

- 5.4 Owing to lack of availability of appropriately sized Town Centre zoned lands in the current LAP area which would be capable of accommodating an Aldi store, larger, appropriately located sites, such as in the eastern part of Longford Town, should make provision for suitably scaled convenience retail to ensure the increased demand in the area is sufficiently met and expenditure leakage from the area is prevented.
- 5.5 In this respect, there may be further opportunities for expanded convenience retail provision particularly adjacent to existing and new residential communities as well as residential zoned lands at locations outside the town centre. This should include District Centre zonings as facilitated by the Longford CDP and draft LAP which are absent to date in the LAP area and can be utilised successfully to implement additional convenience retail and meet identified needs of an increasing population.
- 5.6 **On this basis, Aldi respectfully requests the introduction of a District Centre zoning within the eastern environs of the LAP area to facilitate additional convenience retail commensurate with growing residential population in the settlement and surrounding areas.**
- 5.7 In addition, Aldi seek the following additional text to Policy RET 05:

“RET 05 Support retail development which is of an appropriate size, scale and type to a town centre location in Longford Town’s core shopping area, and at other appropriate locations within the LAP boundary to meet the needs of the existing and future resident population and that of the surrounding areas”.

6.0 Conclusion

- 6.1 The forthcoming Longford Town Local Area Plan will guide future development in the LAP area for a six year period from its adoption to 2031. Aldi are actively seeking a suitable site within the Longford Town LAP area, and it is respectfully submitted that the forthcoming LAP should identify suitable sites for such a development. Aldi are broadly supportive of the retail strategy and planning framework set out in the draft Plan as it relates to retail, however, amendments and additions to the LAP are respectfully requested to be considered and incorporated into the adopted version of the Plan to meet growing convenience retail needs.
- 6.2 A proactive plan-led approach to the delivery of retail development accords with the recommendations of the Retail Planning Guidelines which also put an increased focus on increasing competition in the retail sector. In this regard, it is respectfully requested that the LAP includes appropriately zoned lands, policies and objectives to accommodate new supermarket development in the eastern part of the Longford Town LAP area to provide increased retail choice and variety.

- 6.3 Population growth in Longford Town during the intercensal period exceeds the national average and that population projections set out within the updated National Planning Framework due to be published in October 2024 should be accounted for in the adopted LAP to ensure additional retail provision in the area to meet increasing demand. This will also utilise the existing and anticipated additional residual expenditure per capita in the area which has led to increased leakage due to the extremely low provision new retail floorspace in the county between 2013 and 2021, as highlighted in the Retail Strategy of the CDP.
- 6.4 We would be grateful if the above submission is taken into consideration in the preparation of the adopted LAP.

Yours faithfully,



John Spain

Managing Director John Spain Associates Ltd.