Urban Centres & Retail

8



8 Chapter 8 Urban Centres and Retail

Aim: To continue to promote and encourage town centres as our primary retail centres, at the heart of our communities so that they play a vital role in ensuring these areas remain attractive, universally accessible and liveable places and to make provision for additional retail, at appropriate locations and quantum's where

8.1 Background

Retail is the single biggest private sector employer in the country, with around 300,000 employed in every village, town and city across Ireland and generating around €7 billion in tax revenue for the state every year¹. The economic activity generated in retail in turn supports local suppliers, producers and the wider economy.

The Retail Planning Guidelines for Planning Authorities seek to ensure that the planning system continues to play a key role in supporting competitiveness in the retail sector for the benefit of the consumer by actively enabling good quality development proposals to come forward in suitable locations.

The sector is facing many challenges including an increase in online shopping, impacts on distribution from Brexit and the ongoing consequences of the Covid-19 pandemic including an increase in vacancy levels in our towns and villages throughout the county. Retailing is a fundamental element of town and village centre activity and it is important that these centres maintain, reinstate and improve retailing as a core function which this chapter seeks to address.

8.2 Retail Policy Context

8.2.1 Project Ireland 2040 National Planning Framework (NPF)

One of the main National Strategic Outcomes (NSO) in the NPF prioritises the concept of 'Compact Growth' and to avoid the further sprawl of urban development, which is a key is a top priority in this Plan. The regeneration of existing building stock and/or use of underutilised/brownfield sites within existing urban centres is framed as the best location for future growth.

8.2.2 EMRA Regional Spatial & Economic Strategy (RSES) 2019-2031

The RSES recognises that the retail sector is a significant employer and economic contributor in the Region and plays a key role in placemaking. The Strategy also acknowledges that as a significant attractor it enables the creation of strong mixed-use commercial cores and can play a key role in the regeneration of areas. The RSES outlines the retail hierarchy for the region.

The RSES provides the basis for the integration of land use and transport planning in the Region. In conjunction with the NTA and other agencies the RSES identifies Guiding Principles for the Integration of Land Use and Transportation which promotes, in the first instance, the location of larger scale, trip intensive developments, including retail, into central urban locations.

¹ Election 2020: Next government must address retail challenge by Retail Ireland

8.2.3 Retail Strategy for the Greater Dublin Area (GDA)

The Retail Strategy for the Greater Dublin Area (GDA) for the period from 2008 to 2016, which includes County Kildare, remains the most current strategy. The RSES recognises that certain thresholds set out in the Strategy were prepared in a different economic climate and in many cases have yet to be reached. In this regard, EMRA will support and drive the preparation of a new retail strategy for the Region under the requirements of the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, in order to update this hierarchy and apply floorspace requirements for the Region'.

In accordance with the Retail Planning Guidelines, it is sufficient to state the general retail function appropriate to each settlement along with a general statement of additional retail development requirements. In the absence of a new Retail Strategy for the GDA, this approach has been adopted for the Kildare County Development Plan.

8.2.4 Kildare 2025 Economic Development Strategy

As outlined in detail in chapter 4 of the Plan, this strategy has identified eight key areas that are critical to the future economic success of our county, one of which is retail. It outlines that Kildare has many nationally recognised retail destinations such as Kildare Village and the Whitewater Shopping Centre. Like many counties, smaller towns and villages face persistent challenges of decreased footfall. As a County, Kildare must continue to sustain and improve its retail profile and competitiveness within the Greater Dublin Area's retail economy and beyond, through harnessing the assets and potential of centres at all levels of the County Retail Hierarchy. Kildare also hosts a cluster of large distribution centres for the national retail sector which have been attracted by their ease of access and proximity to Dublin in particular.

Despite some retail activities (e.g. grocery) remaining open in the Covid lockdown and experiencing an increase in demand, the retail sector as a whole has been badly affected, with over 60% of the retail workforce, ca.180,000 people availing of income support at the peak of the Covid-19 restrictions. The drop in footfall generally, has and will continue to threaten the viability of parts of the retail sector. Future-proofing our town centre retail sector is therefore a key priority of this Plan. Vacant premises that lie unoccupied for periods of time can create a negative perception of a place which can act as a deterrent for potential investors and retailers. It is therefore important to revitalise such vacant premises, particularly in central locations which contribute to compact growth and sustainable living².

This strategy outlines 5 Strategic Objectives for the Plan, which include:

- 1. Strengthen the resilience of our retail sector to rebuild stronger and greener.
- 2. Facilitate and support the retail offering's expansion and sustainment in County Kildare.
- 3. Measures to revitalise town centres.
- 4. Explore new opportunities in the circular economy for our retail businesses.
- 5. Enable retailers to adopt online business models.

Furthermore, this strategy outlines 9 actions to achieve the above objectives.³

² Society of Chartered Surveyors

³ P45 of Chapter 7 – Retail of the Kildare 2025 Economic Development Strategy

8.2.5 Retail Planning Guidelines (DoECLG, 2012)

The Retail Planning Guidelines aim to ensure that the planning system continues to play a key role in supporting competitiveness and choice in the retail sector commensurate with promoting the vitality and viability of town centres. The Guidelines note the major role that shopping plays in attracting people to cities, towns and villages.

These Guidelines identify five key policy objectives:

- Ensuring that retail development is plan-led;
- Promoting city/town centre vitality through a sequential approach to development;
- Securing competitiveness in the retail sector by actively enabling good quality development proposals to come forward in suitable locations;
- Facilitating a shift towards increased access to retailing by public transport, cycling and walking;
- Delivering quality urban design outcomes.

The objectives set out in this Plan have been prepared having regard to the guidance set out in these Guidelines.

8.2.6 Retail Design Manual (DoECLG, 2012)

The Retail Design Manual notes that achieving a high quality of architecture and urban design in new retail development can be a key ingredient in delivering sustainable development in urban places: generating direct and indirect employment, stimulating investment and economic activity, enhancing social vibrancy and vitality, increasing consumer choice and value, reducing car dependency for everyday trips and stimulating spin-off development including service functions and housing. The manual sets out 10 key principles of urban design to inform new retail development and to promote a step-change in the quality of new retail development.

8.2.7 Town Centre First – A Policy Approach for Irish Towns

The Government's Town Centre First policy acknowledges the challenges that town centre retail activities continue to experience, which is primarily due to the changing habits of consumers and, in particular, the rise of online shopping. The effects of this can be seen in settlements across the county, with most designated core retail areas suffering from sustained levels of high retail vacancy. The Town Centre First policy seeks to respond to this issue by increasing the focus on the 'retail-led experience' which includes a blend of retail services (including food and drink), leisure, entertainment, and cultural uses. This approach fully aligns with the intentions of Kildare County Council to future proof town centres by making them more attractive visitor destinations, through the implementation of public realm improvement works, the promotion and support of 'meanwhile use' to provide for temporary uses to be accommodated in vacant units, and other bespoke regeneration initiatives. It is considered that the development of new and alternative uses and functions for town centres that maximise new recreational, tourist, cultural, employment and residential opportunities will help to secure the long-term viability of the existing retail offer in the county's town centres.

Overarching Retail Policy

It is the policy of the Council to:

RET P1	Develop County Kildare's retail economy in accordance with national,
	regional and local policy in order to sustain and expand the retail sector
	as a catalyst for social and economic vibrancy.

Overarching Retail Objectives

RET O1	Ensure that the note: model of the country's posidents are not as
REIOI	Ensure that the retail needs of the county's residents are met as
	extensively as possible within Kildare, taking cognisance of the Regional
	and County Retail Hierarchies, to enable the reduction in the
	requirement to travel to meet these needs and in the interests of
	achieving greater social inclusion and universal accessibility to shopping
	and services across all sectors of the community.
RET O2	Provide clear guidance on where major new retail floorspace would be
	acceptable throughout the county having regard to the County Retail
	Hierarchy as part of the preparation of the Local Area Plans.
RET O3	Continue to address leakage of retail expenditure from Kildare through
	securing the development of the appropriate quality and quantum of
	additional convenience, comparison and bulky goods floorspace at
	appropriate locations throughout the county.
RET O4	Sustain and enhance the increase in comparison expenditure inflows to
	the county, at regional, national and international level, through
	delivering a quality and quantum of retail offer in accordance with the
	Retail Planning Guidelines 2012.
RET O5	Reinforce the core of town and village centres as the priority location for
	new retail development, with quality of design and integration/linkage
	being fundamental prerequisites and bring forward zoning designations
	within the zoning matrix in Local Area Plans specifically for large
	convenience stores, where appropriate.
RET O6	Align, as far as practicable, new retail development with existing and
	proposed public transport infrastructure and services and encourage
	access by foot and bicycle to reduce the dominance of access by private
	car.
RET O7	Improve the universal accessibility of the town centre with particular
	emphasis on creating a high quality, safe and permeable environment
	that is easily accessible to pedestrians and cyclists.
RET O8	Encourage and facilitate the preservation and enhancement of the retail
	and services role of both individual villages and village/ settlement
	clusters around the county.
RET O9	Promote retail-led tourism in Kildare and to facilitate the provision of
	tourism infrastructure.
RET O10	Encourage and facilitate innovation and diversification in the county's
	retail profile and offer.

RET O11	Support existing retail facilities and to facilitate the provision of new facilities as appropriate where such proposals are in accordance with the Datail Dispring Quidelines the Datail Datail Strategy the Care
	the Retail Planning Guidelines, the Regional Retail Strategy, the Core Strategy and Settlement Strategy and the proper planning and sustainable development of the area.
RET O12	Support and encourage diversity in the retail offer, including the sustainability of the independent retail sector in the county.

8.3 Innovation in the County's Retail Offer

To ensure that the county sustains and enhances its attraction and competitiveness as a retail destination, it must be proactive and responsive in respect of innovation in retailing and new retail market trends. One such innovation includes experience-based shopping where the goods being offered as well as the setting, the interactions and product knowledge, together create a fully immersive experience. Buying local has become increasingly important, particularly during the Covid-19 pandemic.

Objectives

It is an objective of the Council to:

RET O13	Encourage and facilitate innovation in the county's retail offer and attraction and supporting and facilitating local businesses and trades to develop and market products locally, where possible.
RET O14	Support innovativeness in the provision of sustainable retailing throughout the county which reduces food miles and encourages more sustainable forms of transport.

8.4 County Retail Hierarchy

The County Retail Hierarchy provides the strategic policy framework for the spatial distribution of new retail development. The emphasis is on strategic guidance on the location and scale of retail developments with the hierarchy setting the framework for the spatial distribution of the quantum and nature of convenience and comparison floorspace. It is defined as follows:

- Level 2 Major Town Centres & County (Principal) Town Centres: major convenience and comparison.
- Level 3 Town and/or District Centres & Sub-County Town Centres (Key Service Centres): large scale convenience and middle order comparison, not excluding higher order comparison particularly related to the tourism economy.
- Level 4 Neighbourhood Centres, Local Centres-Small Towns and Villages: predominantly additional convenience not excluding tourism related comparison.

The RSES outlines level 2 and Level 3 town centres while the county retail hierarchy identified in the Kildare County Development Plan outlines Level 4 small towns and village centres.

Policy

It is the policy of the Council to:

RET P2	Guide major retail development in accordance with the framework
	provided by the County Retail Hierarchy (Table 8.1) to enable an efficient,
	equitable and sustainable distribution of retail floorspace throughout the
	county.

Level 2	Major Town Centres & County (Principal) Town Centres
	Naas, Newbridge, Maynooth
Level 3	Town and/or District Centres & Sub-County Town Centres (Key Service Centres)
	Celbridge, Kilcock, Athy, Kildare, Monasterevin, Clane, Leixlip, Kilcullen
Level 4	Neighbourhood Centres, Local Centres-Small Towns and Villages
	Small Town Centres Castledermot, Prosperous, Rathangan, Derrinturn, Kill and Sallins Village Centres Straffan, Allenwood, Ballitore, Ballymore-Eustace, Crookstown and Robertstown
Level 5	Corner Shops/Small Villages

 Table 8.1 - Retail Hierarchy for County Kildare

8.5 Sequential Approach

The Sequential Approach is incorporated in the strategic policy framework for guiding new retail development. It recognises the importance of sustaining the vitality and viability of town and village centres. Planning applications for retail development proposals, including extensions or a material change of use of existing developments (as introduced in the Retail Planning Guidelines 2012), must comply with the criteria of suitability of use, size, scale and accessibility and the following key principles of the Sequential Approach:

- i. In the first instance, the priority is to locate retail development in town centres or village centres;
- ii. Where town/village centre locations are not readily available within a reasonable and realistic timescale and where this has been demonstrated to the satisfaction of the Council then edge of centre sites may be considered. The Retail Planning Guidelines define such sites as being within 300 400 metres of the Core Retail Area of a centre; and
- iii. Only after the options for town centre (or village centre) and edge of centre sites are exhausted should out of centre locations and sites be considered.

The detail of the requirements for retail applications and the assessment of these by the Council under the tests of the Sequential Approach are set out in the 2012 Retail Planning Guidelines.

Objectives

It is an objective of the Council to:

RET O15	Guide retail development to town and village centres in the first instance
	where practical and viable in accordance with the Sequential Approach
	as set out in Section 8.5 above, in order to ensure that the vitality and
	viability of existing town and village centres is sustained and
	strengthened.

8.6 Core Retail Areas

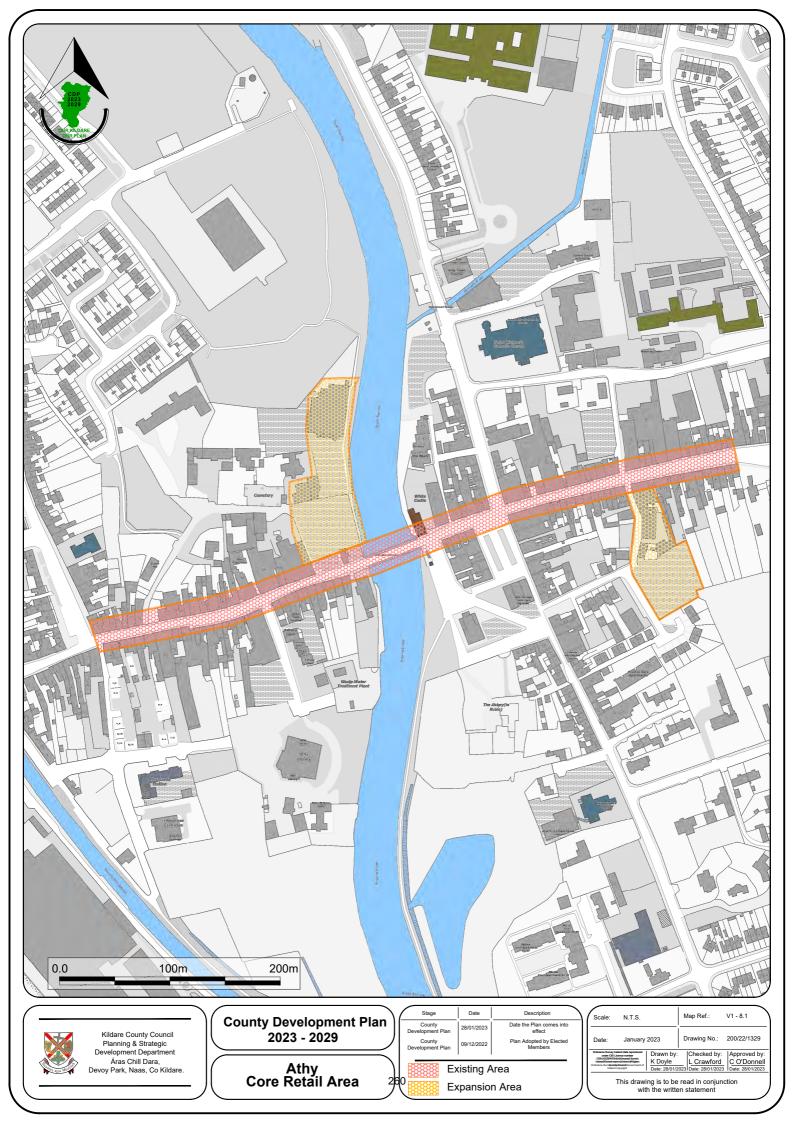
The Core Retail Area is that part of a town centre which is primarily devoted to shopping, as distinct from the wider Town Centre Zoning Objective. It is normally defined as the area including, and immediate to, the 'prime pitch'. This is the area that achieves the highest rentals, best yields, is highest in demand from retailers, developers and investors and the area in which pedestrian flows are greatest. The designation of Core Retail Areas generally is only applicable to the main towns in the County Retail Hierarchy whereas in smaller centres retail floorspace is on the whole more dispersed. The designated Core Retail Areas of medium to large urban centres in the county are shown in Maps V1 - 8.1 to 8.11 and relate to the settlements of Athy, Celbridge, Clane, Kilcock, Kilcullen, Kildare, Leixlip, Maynooth, Monasterevin, Naas and Newbridge.

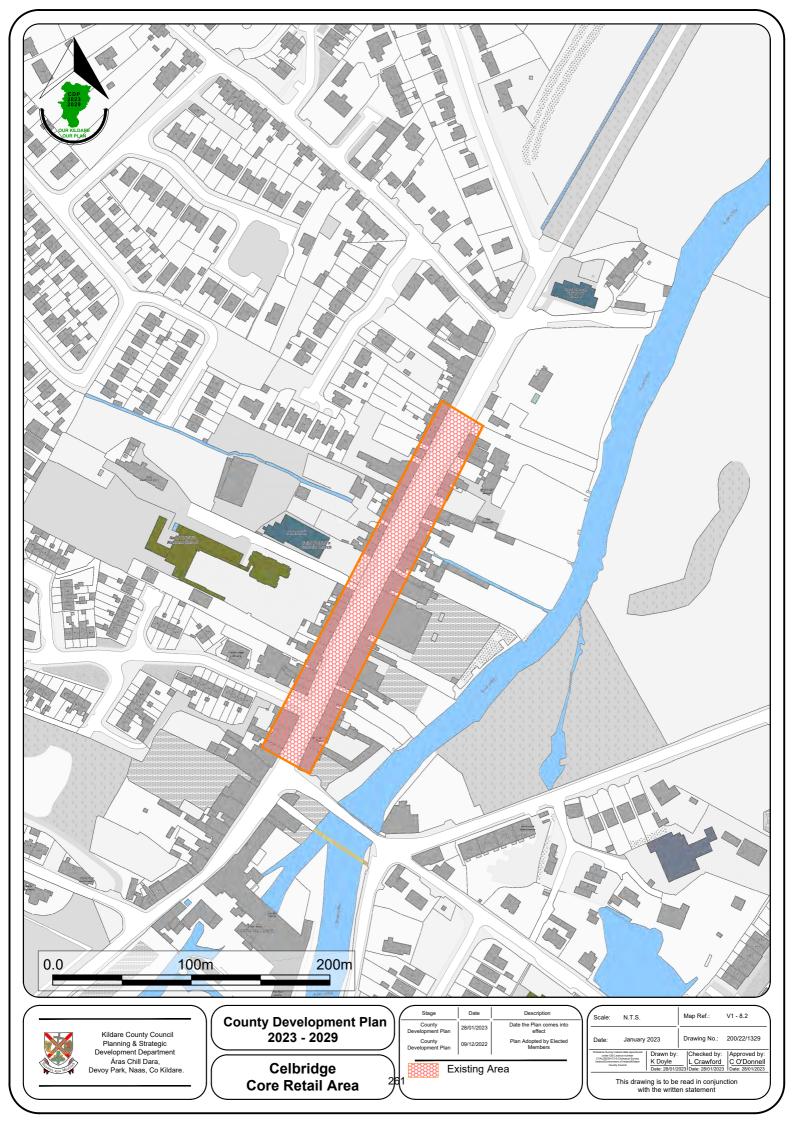
Core retail areas contain the primary retail streets of a centre where the main concentration of retail activity takes places and are normally characterised by a mix of factors including prime retail units, low vacancies, a predominance of multiples and well-established family run stores, few non retail uses and high pedestrian foot flow. New retail development will be preferred and encouraged within the core retail areas; however, it is recognised that such core areas may expand to the immediately adjacent areas over the life time of this Plan and subsequent Local Area Plans.

Objectives

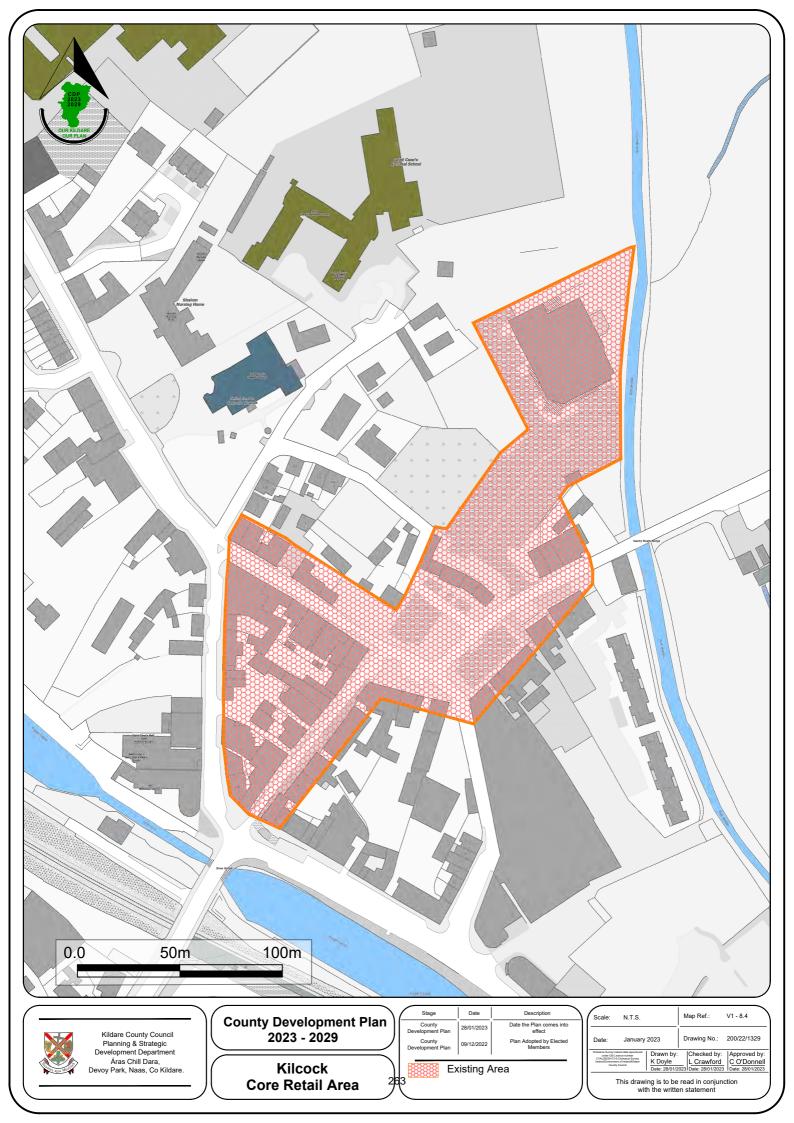
RET O16	Ensure that Core Retail Areas, as defined in this County Development Plan, are carried through to Local Area Plans and other land use plans to clarify the extent of the core area for primacy of the retail function and to guide the application of the sequential approach to retail development.
RET O17	Ensure that Town Centre zoning is applied in Local Area Plans and, where appropriate, designate further Town Centre Expansion Areas subject to the tests of the Sequential Approach to enable the retail vision for these centres to be achieved and to provide appropriate guidance to applicants.
RET O18	Encourage and facilitate the re-use and regeneration of derelict/underutilised brownfield land, vacant sites and buildings for retail and other town centre uses, having regard to the Sequential Approach outlined in the Retail Planning Guidelines and as set out in Section 8.5 above.

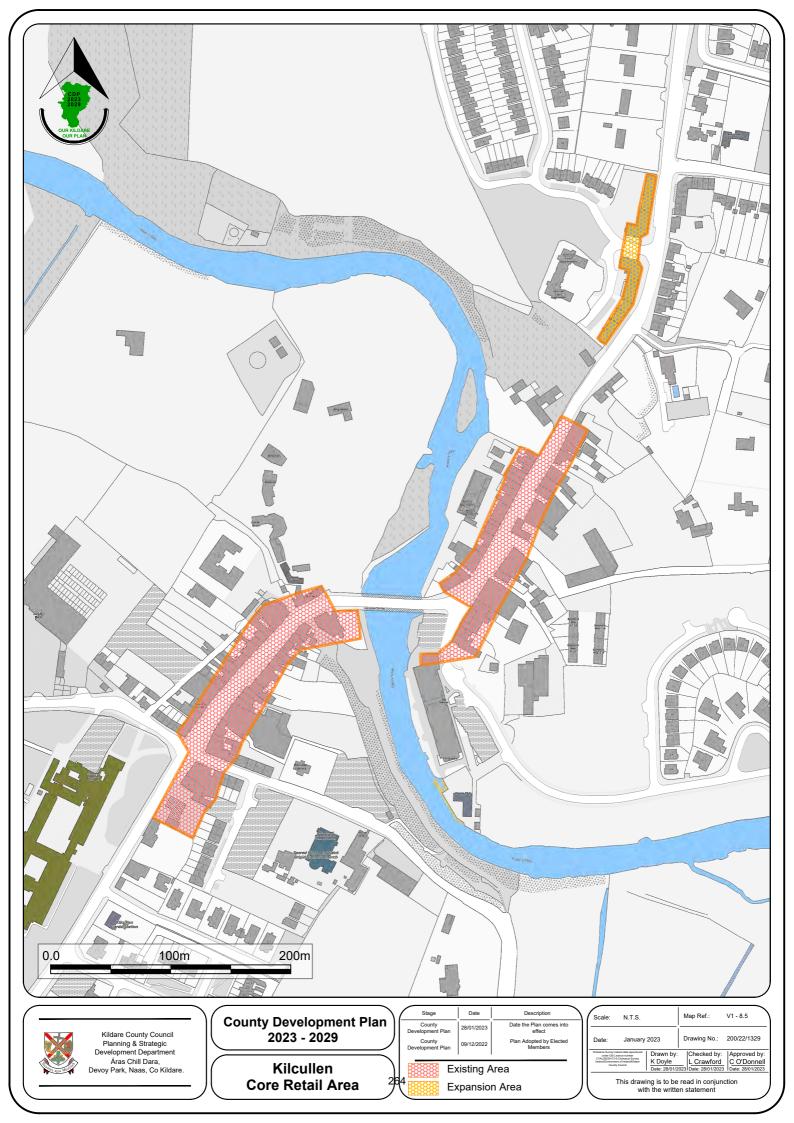
RET 019	Protect and enhance the retail primacy and character of the town/village
	centre by particularly supporting development that consolidates the
	existing urban core and responds positively to its established built form,
	scale and character.

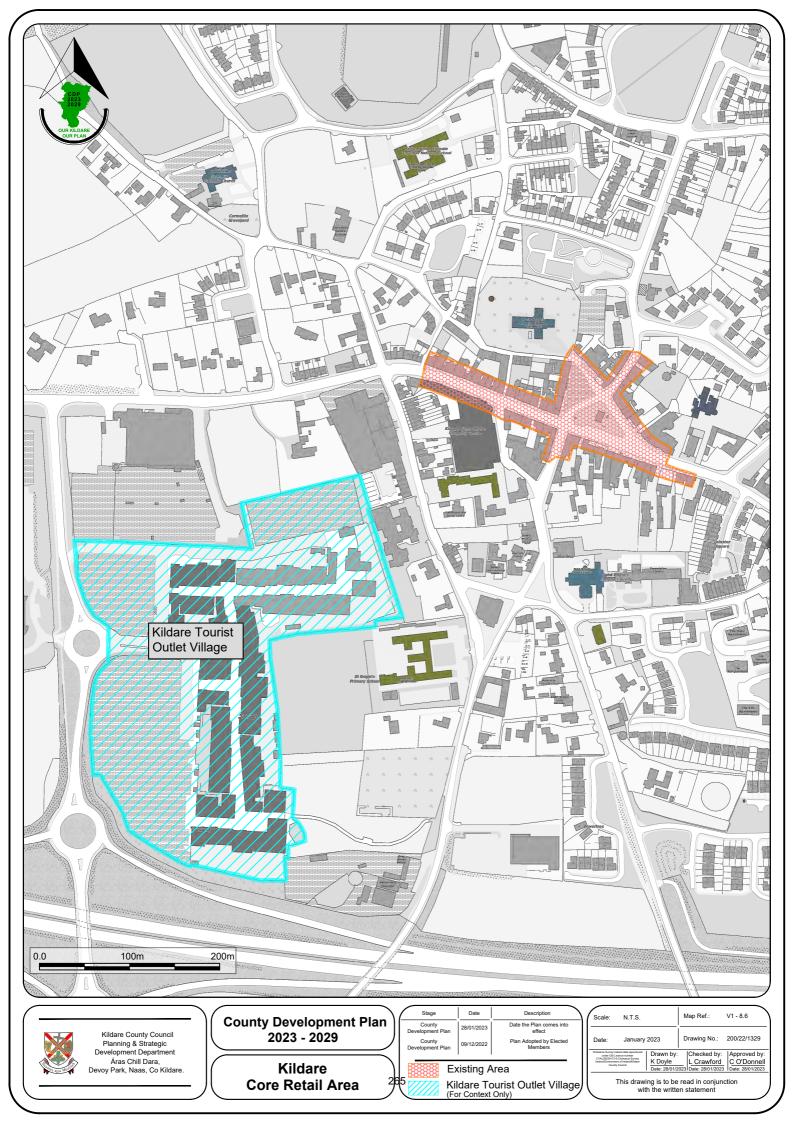


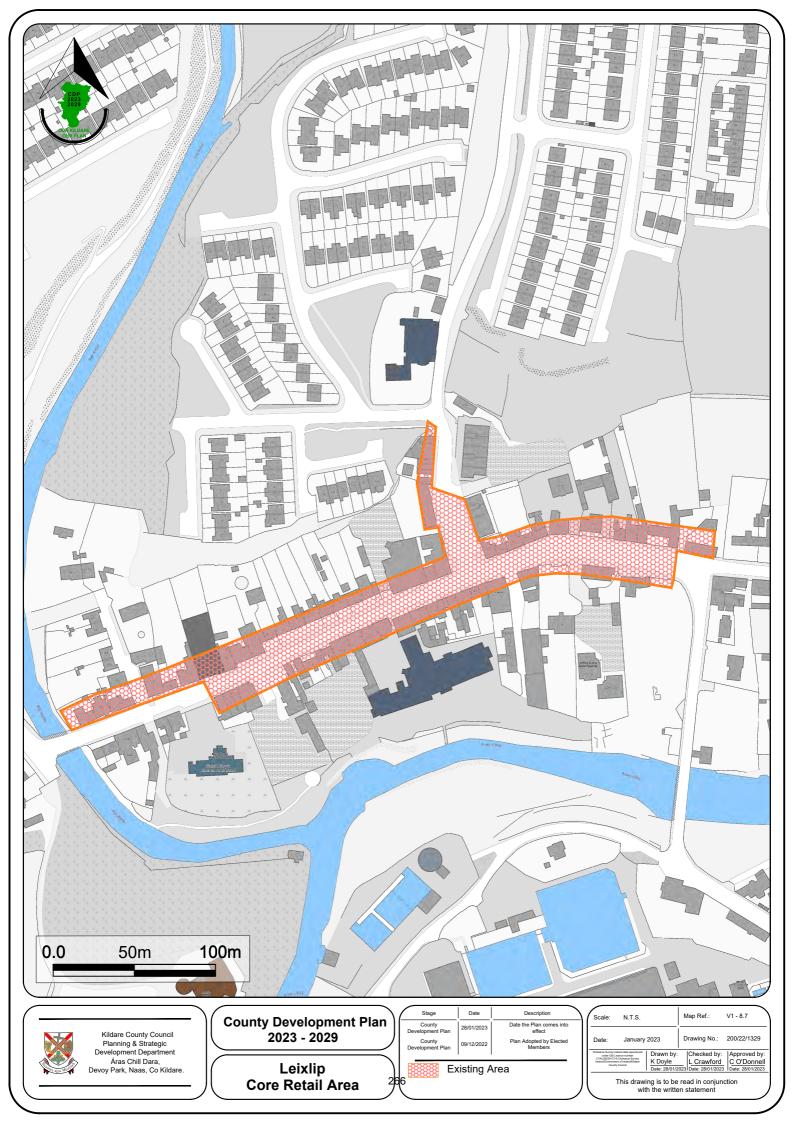


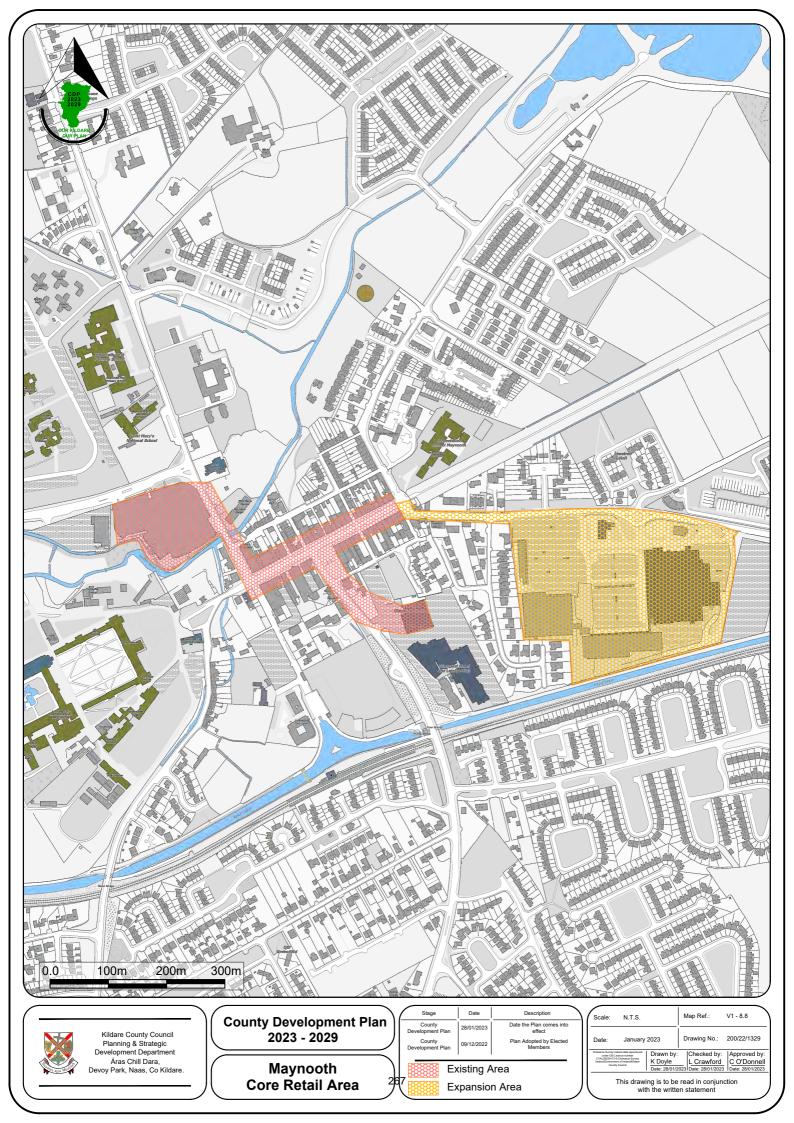


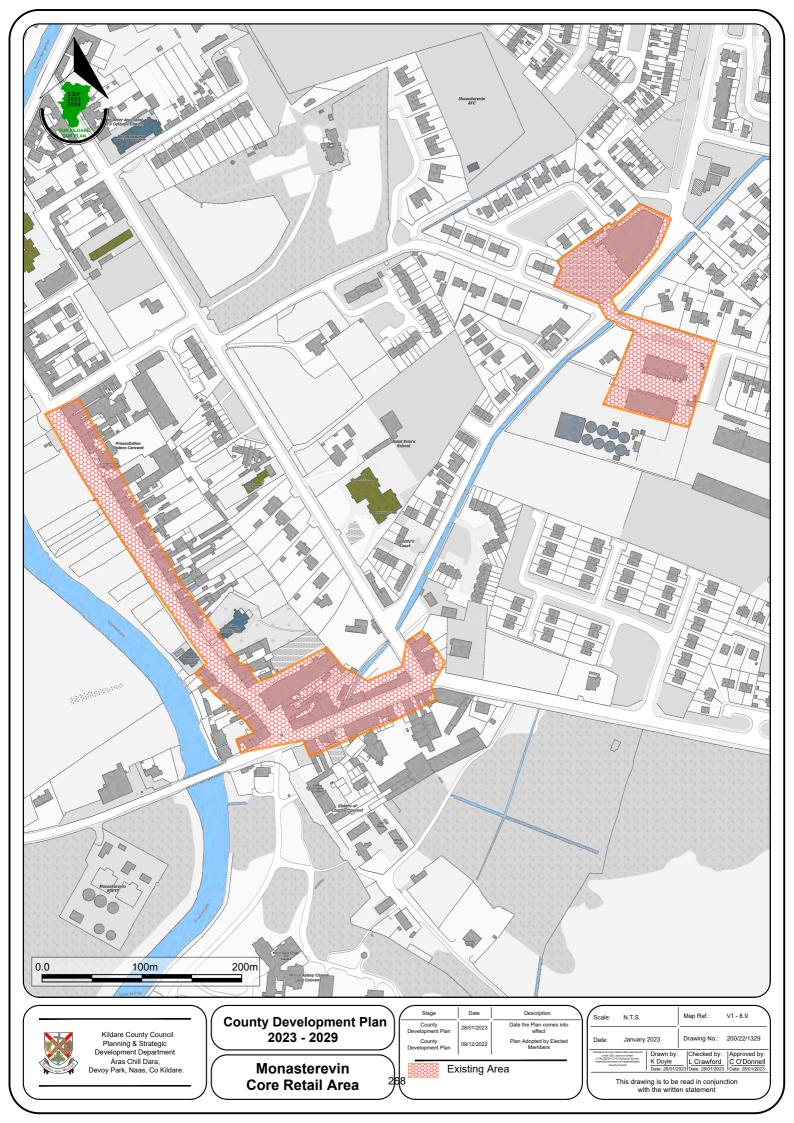


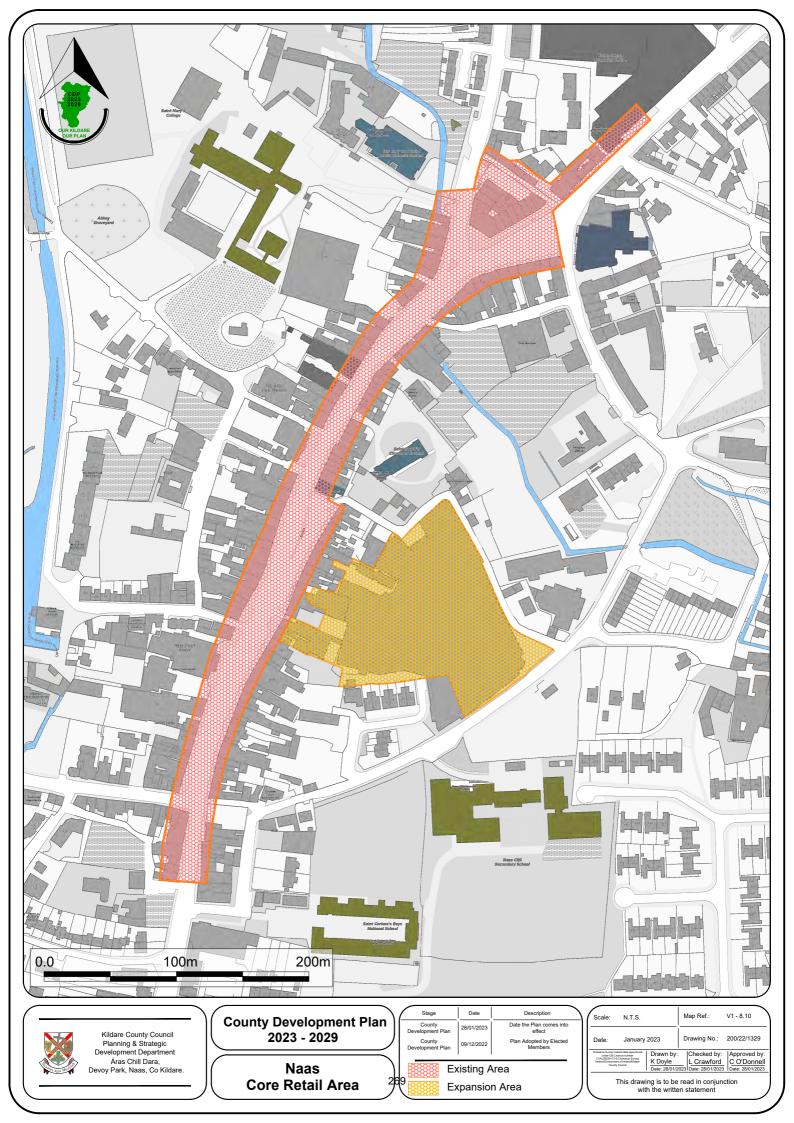


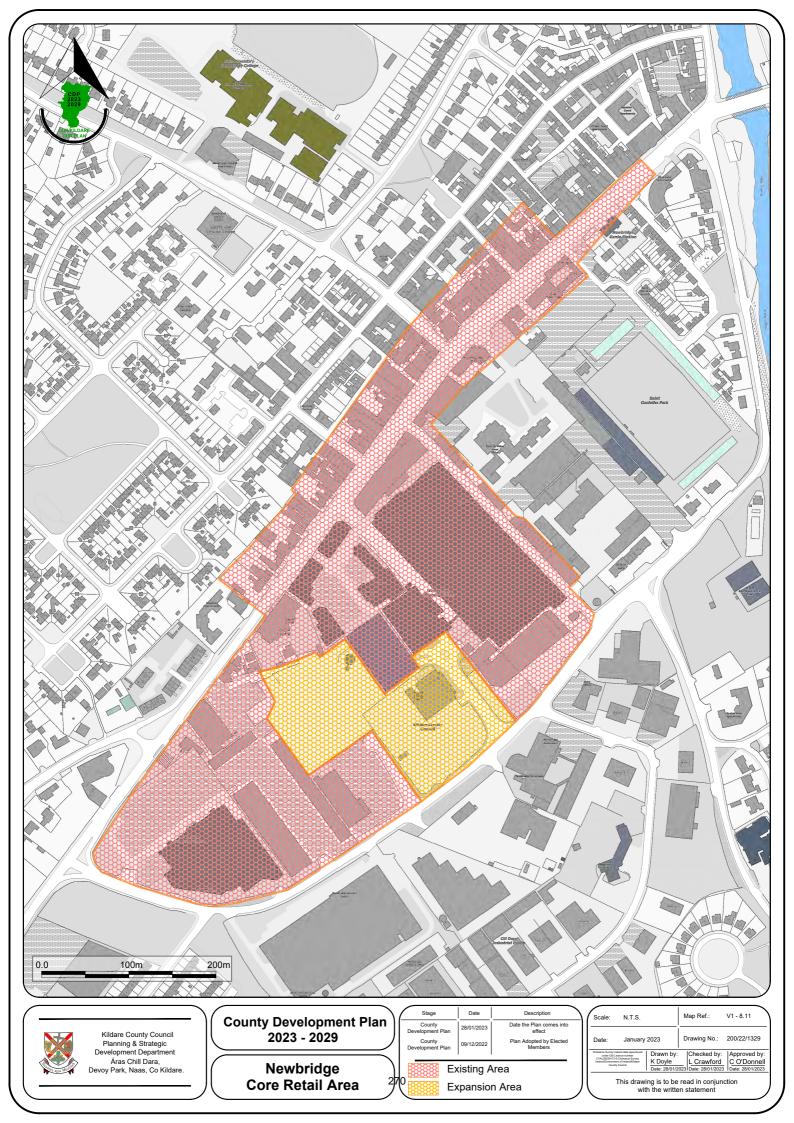












8.7 Retail Policies for Towns and Settlements in Kildare

8.7.1 Level 2 – Major Town Centres and County (Principle) Town Centres

8.7.1.1 Naas

Naas is designated as a Level 2 Major Town Centre in the RSES retail hierarchy. In this regard. Naas provides employment for its surrounding areas, has access to highquality transport links and has the capacity to act as a growth driver. The RSES identified Naas as having a high job ratio providing a large employment base for resident workers and attracting inward commuting from a wide catchment comprising north Kildare and west Wicklow. The strategy identifies several areas within the town to capitalise on economic growth such as the development of Corban's Lane Shopping Centre.

The town centre is located primarily along North and South Main Streets and expands out onto neighbouring streets and towards the Devoy Quarter. It is largely characterised by small, narrow plot sizes interspersed with larger civic and financial buildings. It offers a range of convenience and comparison shops, pharmacies, cafés, restaurants, hotels and public houses. It has a strong evening economy and has been accredited the Purple-Flag status for standards of excellence in managing the evening and night-time economy, as one which is enjoyable, entertaining, diverse and safe.

The Core Retail Area (See Map V1 - 8.10) which forms part of the commercial core, is the preferred area for retailing to protect and improve its vibrancy and vitality. The footprint of the commercial core will be consolidated and encouraged to expand to the east and west of Main Street. It is envisaged that this expanded core will include a range of uses such as financial, hospitality and residential along with retail and services.

At present retailing is concentrated along the Main Street and has extended into some secondary streets. A number of sites, retail units and buildings located within the town centre are vacant and/or underutilised and have been for a number of years. There has also been a shift from the primacy of the town centre, with out-of-town developments at Monread, the Globe Retail Park and Naas Retail Park at Newhall. This shift is similar to many towns nationally. To counteract this, the Retail Planning Guidelines (2012) have placed greater emphasis on promoting the development of retailing in town centres in the first instance.

In order to reinforce the town centre as a viable, vibrant, universally accessible and attractive retail centre, the Main Street should be retained as the centre of commercial and retail activity. Comparison shopping must be promoted and enhanced in Naas to reflect its role at the top of the retail hierarchy in Kildare (along with Maynooth). There needs to be an emphasis on consolidation and regeneration of the town centre in order to reflect compact growth and broaden its appeal and offering. Within the centre of the town there are key strategic sites such as the Naas Shopping Mall. The Main Street and in particular, the unfinished Naas Shopping Centre (extending from Main Street to Corban's Lane - with multi-storey car parking), will be prioritised for redevelopment and new retail/commercial development. There are also a number of other key under- utilised sites in the vicinity of Abbey Street, Church Lane, Corban's Lane and Friary Lane that offer retail potential.

Objectives

It is an objective of the Council to:

RET O20	Promote and encourage major enhancement and expansion of mainstream comparison floorspace and town centre functions in Naas, to reflect its role as a Major Town Centre and further develop its competitiveness and importance as a key town in the Regional Spatial and Economic Strategy.
RET O21	Support and facilitate the development of retail, retail services and niche retailing in the town centre area, where it will consolidate and strengthen the primacy of town centre areas, including new/infill development and redevelopment of an appropriate scale.

8.7.1.2 Newbridge

Newbridge is designated as a Level 2 Major Town Centre in the RSES retail hierarchy. Newbridge has sustained and enhanced its profile as the most important mainstream comparison shopping retail destination in Kildare, with mass appeal that extends beyond the county's boundaries. This is based on the combined quality and quantum of retail within the Whitewater Shopping Centre, a good array of international retailers. These international retailers are complemented by a host of independent retailers – including the presence of the unique Newbridge Silverware with its distinctive offer of jewellery, tableware and giftware - which add to the vibrancy and vitality of the Town Centre and have elevated the town to one of the most important Level 2 centres in the region, and nationally.

It is noted that with the development of the Whitewater Shopping Centre and the growth and expansion of large scale ('big box') retailing at the south end of the town, including convenience, comparison and retail warehousing uses, has had an impact on the vitality of the Main Street – especially at the northern end of the town. Vacancy coupled with the proliferation uses such as bookies and takeaways have impacted on the vitality of the town centre. The town continues to experience strong growth in residential development and population growth which should assist in supporting in the consolidation and revitalising the Main Street. This will be the focus for Newbridge over the period of the plan. Urban Regeneration Development Funding for a cultural quarter at the north end of Main Street will also assist in revitalising the area.

Objectives

RET O22	Support the appropriate development of underutilised lands and buildings within the existing Core Retail Area of Newbridge Town Centre (See Map V1 - 8.11)
RET O23	Support the framework for a more integrated approach to the planning of the town centre through the review of the Newbridge Local Area Plan 2013 – 2019, and in particular Edward Street/Main Street North/Charlotte Street/ Eyre Street area being a focus for achieving greater linkage and commercial synergy.

RET O24	Continue to enhance the profile of Newbridge through strategic
	environmental enhancement, the creation of vibrant urban spaces,
	places of interest and the introduction of public art.
RET O25	Monitor and restrict the number of lower order retail/commercial uses.

8.7.1.3 Maynooth

In the previous development plan Maynooth was designated a Tier 1 Level 3 Town Centre. However, the Regional Retail Strategy of the Regional Spatial and Economic Strategy 2019-2031 RSES re-designated Maynooth as a Level 2 Major Town Centre. The Town Centre Expansion Area (as identified in Map V1 - 8.8) should therefore maximise linkage and synergy with the town's Core Retail Area. The RSES states that Maynooth has the potential to act as a major shopping destination for the surrounding area. The main street and surrounding laneways support many local restaurants, cafes and bars and the night-time economy that cater for the local population and the town's large student community. The town also acts as a retail and service centre for north Kildare, with the Manor Mills and Carton Park retail developments attracting many shoppers from the surrounding towns and hinterland.

Objectives

It is an objective of the Council to:

RET O26	Reinforce the heart of the town as the priority location for new retail development, with quality of design and integration/linkage within the existing urban form/layout being fundamental prerequisites.
RET O27	Facilitate the development of appropriately scaled retail development in the Leinster Street and Canal Harbour areas.
RET O28	Secure the continued consolidation of Maynooth Town Centre through progressing the implementation of the Maynooth and Environs Joint Local Area Plan and the regeneration of backland and brownfield areas in the town centre.
RET O29	Encourage and facilitate the development of a combined and unique heritage, retailing and tourism experience within Maynooth and to encourage strong linkages between these attractions.
RET O30	Restrict any out-of-town retail developments, other than local neighbourhood centres in Maynooth to be considered as part of the Joint Local Area Plan for Maynooth and Environs.

8.7.2 Town and/or District Centres & Sub-County Town Centres (Key Service Centres)

8.7.2.1 Celbridge

Celbridge has been designated a Level 3 town centre in the RSES retail hierarchy. The policies and objectives of this County Development Plan seek to strengthen the established retail function of Celbridge Town Centre by promoting renewal and appropriate infill development in the town centre (see Map V1 - 8.2). Retail provision outside of the town centre will be limited to renewal of established neighbourhood centres and to new and existing residential districts.

Celbridge Town Centre is focused around the historic core and has not expanded to any significant extent since the 18th Century, despite the wider growth of the town.

Objectives

It is an objective of the Council to:

RET O31	Protect the quality, ambience, vibrancy and vitality of Celbridge town centre by promoting an appropriate mix of day and nighttime commercial uses.
RET O32	Support development that will strengthen the town centre and act as a catalyst for renewal.
RET O33	Encourage and facilitate the re-use and regeneration of vacant or underused sites for appropriate town centre uses and encourage the full use of buildings and in particular, upper floors and back lands.
RET O34	Support KDA 1 in the Celbridge Local Area Plan which requires a masterplan for a mixed-use scheme with a retail element at St. Raphael's (Oakley Park).

8.7.2.2 Kilcock

Kilcock has been designated a Level 3 town centre in the RSES retail hierarchy. Due to the growing population of this town in recent years there has been market interest for retail investment in the town with a Tesco Express and a SuperValu store on the north of the square having opened. While these are important additions to the town's retail offer, Kilcock's proximity to Maynooth, the second most important retail centre in the county, is recognised. New retail development should be able to occupy any vacant premises in the town centre. Such retail development shall also complement the existing heritage townscape and capitalise upon Kilcock's profile on the Royal Canal.

Objectives

RET O35	Encourage and facilitate the regeneration of land and buildings in the Kilcock Core Retail Area and other Town Centre zoned lands in the first instance and to only permit retail development outside the Core Retail area where to do so is proposed in line with the Sequential Approach, to the satisfaction of the Planning Authority.
RET O36	Work with all stakeholders in further promoting the asset of Kilcock's heritage townscape and location on the Royal Canal.
RET O37	Reinforce the Main Street as the priority location for new retail development, with quality of design and integration/linkage within the existing urban form/layout being fundamental prerequisites.
RET O38	Encourage and facilitate the development of a combined and unique heritage, retailing and tourism experience within the town and to encourage strong linkages between these attractions.

8.7.2.3 Athy

Athy has been designated a Level 3 town centre in the RSES retail hierarchy. The range of retailing which is deemed appropriate in the County Retail Strategy for centres at this level is large scale convenience and middle order comparison. This however does not exclude higher order comparison, particularly relating to the tourism industry.

An important priority for the Plan is to ensure that Athy fulfils its designated role as a Key Service Centre within the County Retail Hierarchy. However, it is recognised that there are long standing deficiencies in Athy's retail offering which is undermining the town's potential in fulfilling its strategic role. Furthermore, changing retail trends and habits over the past decade, including the rise of online shopping and an increasing level of retail leakage to other urban centres such as Carlow and Newbridge, have resulted in a high number of vacant commercial units within the town centre and an increase in lower order units (including charity shops, takeaways, etc).

The Core Retail Area of Athy focuses along an east-west axis encompassing Duke Street and Leinster Street (see Map V1 - 8.1). This area is the preferred area for retail development. This Plan anticipates that new retail provision will be achieved through a combination of appropriate infill, regeneration and renewal of sites. A retail expansion area has also been identified which focuses on Edmund Rice Square and a regeneration site to the rear of Leinster Street where appropriate convenience retailing could be located.

Objectives

It is an objective of the Council to:

RET O39	Consolidate existing retail development and to develop/regenerate opportunity sites/areas within the town centre, in particular the regeneration site to the rear of Leinster Street identified in the Urban Regeneration Framework as part of the Athy Local Area Plan 2021-2027.
RET O40	Work with all stakeholders in Athy to redress the high retail expenditure leakage from the town, its catchment area and the south of the county as a whole and deliver the vision and potential of the town, as set out in the Athy Local Area Plan 2021 – 2027.
RET O41	Particularly support the redevelopment of vacant units in the town centre and generally encourage owners of such properties to avail of any grant aid funding that may assist with their rejuvenation, in order to add to the attractiveness of the town of Athy.

8.7.2.4 Kildare

Kildare has been designated a Level 3 town centre in the RSES retail hierarchy. Kildare is a historic market town, with a market square surrounded by retail units with traditional shop fronts. The Core Retail Area (see Map V1 - 8.6) mainly serves the local population, while the adjoining Kildare Tourist Outlet Village has a regional, national and international retail profile – with in excess of 5 million visitors a year. This Plan will seek to strengthen the established retail function of Kildare through a combination of

redevelopment of appropriate infill and opportunity sites in the town centre and to encourage occupancy of vacant units in the Kildare Town Centre Shopping Centre. It is also a priority to engage with relevant landowners with a view to delivering on an appropriate and effective linkage with the Kildare Tourist Outlet Village to Academy Street/Bride Street/Market Square. If a percentage of visitors could be enticed to walk from the Kildare Tourist Outlet Village to the Town Centre, the potential spin-off could be transformative for the town and bring additional benefits from visiting shoppers.

Objectives

In support of Kildare town's designation as a primary tourism town in the county, it is an objective of the Council to:

RET O42	Facilitate the consolidation/expansion of the town centre of Kildare Town through infill development and the redevelopment/regeneration of derelict/under-utilised sites and buildings particularly those within the Core Retail Area.
RET O43	Encourage the development of independent retail outlets and markets in the town centre that will create a unique character and shopping experience for tourists and visitors and add to the attractiveness of Kildare Town.
RET O44	Develop a well-designed pedestrian link from the Kildare Tourist Outlet Village (KTOV) to the town centre, in consultation with the various third- party landowners, with a view to better integration, enhancing visitor experience and promoting the heritage and evening economy of the town centre in accordance with the guidance in the Retail Planning Guidelines 2012 and accompanying Retail Design Manual.

8.7.2.5 Monasterevin

Monasterevin has been designated a Level 3 town centre in the RSES retail hierarchy. The retail profile of the town is characterised as being predominantly convenience comprising the neighbourhood shopping centre with Supervalu as the anchor tenant along with a mix of independent retailers and service providers. The strategy for developing the town's retail profile is centred on the revitalisation of the town centre through the regeneration of vacant and under-utilised sites and structures. The improvement of the overall public realm and built environment of Dublin Street, Market Square, Main Street and Moore Street is also a priority in terms of increasing the town's retail profile.

Objectives

RET O45	Encourage the growth and development of retail and other town centre
	services/ functions in Monasterevin within the Core Retail Area (see Map
	V1 - 8.9), to enable the town to grow into a more self-sustaining town.
	While also progressing the redevelopment/regeneration of town centre
	sites, with the emphasis on consolidation of the town centre through
	mixed-use retail-led regeneration.

RET O46	Develop and build on the tourism potential of Monasterevin's heritage,
	including distilling and brewing and its natural environments as part of an
	integrated strategy for raising their profiles and identities.

8.7.2.6 Clane

Clane has been designated a Level 3 town centre in the RSES retail hierarchy with the Core Retail Area being based around Main Street, in a linear pattern (see Map V1 - 8.3). Retail provision in Clane is based around Main Street, the Abbeylands Shopping Centre and Aldi to the south of Main Street and in Lidl and Tesco Metro on the Dublin Road.

The future retail potential of Clane is influenced by its proximity to higher order centres, such as Naas, Newbridge, and Maynooth with Clane providing a local and niche retail function. The policies and objectives of this Plan seek to strengthen this established retail function. Given the compact nature of the settlement and the critical mass required to support a viable retail centre, it is the policy of the Council to focus new retail development into the Core Retail and town centre areas. The opening of further retail floorspace outside of the town centre has the potential to significantly alter the retail dynamic of the town and undermine the vitality and viability of the town centre. It will be a key priority to reinforce the town centre as a vibrant retail centre with an attractive urban environment.

Objectives

It is an objective of the Council to:

RET O47	Reinforce the town centre as a priority location for retail development and to promote new development that consolidates the existing urban core.
RET O48	Protect the quality, ambience, vibrancy and vitality of Clane Town Centre by promoting an appropriate mix of day and night time uses.
RET O49	Encourage and facilitate the full use of buildings and sites and in particular the use of upper floors and backlands, with due cognisance to the sequential approach to retail development, quality of urban design, integration and linkage.

8.7.2.7 Leixlip

Leixlip has been designated a Level 3 town centre in the RSES retail hierarchy. The Main Street is identified as Leixlip's core retail area (see Map V1 - 8.7). It offers a range of convenience and comparison stores, pharmacies, restaurants, a hotel and public houses which create an ambience that attracts both locals and visitors. A number of residential properties are also located in the town centre which helps retain a living centre.

Objectives

It is an objective of the Council to:

RET O50	Protect the visual character, cultural heritage, ambience and vitality of the traditional heart of the town centre in order to meet the retailing and service needs of the area, in addition to offering a pleasant and attractive environment for shopping, business, tourism, recreation and living.
RET O51	Support the retail function of Leixlip through a combination of redevelopment of appropriate infill and opportunity sites in the town centre and on other suitably zoned lands within the local area plan boundary.

8.7.2.8 Kilcullen

Kilcullen has been designated a Level 3 town centre in the RSES retail hierarchy with the Core Retail Area being based around Main Street, in a linear pattern (see Map 8.5).

The future retail potential of Kilcullen is influenced by its proximity to higher order centres, such as Naas and Newbridge, with Kilcullen providing a local and niche retail function. The policies and objectives of this Plan seek to strengthen this established retail function. It is the policy of the Council to focus new retail development into the Core Retail Area. The opening of further retail floorspace outside of the town centre has the potential to significantly alter the retail dynamic of the town and undermine the vitality and viability of the town centre. It will be a key priority to reinforce the town centre as a vibrant retail centre with an attractive urban environment.

Objectives

RET O52	Reinforce the Main Street as the priority location for new retail
	development, with quality of design and integration/linkage within the
	existing urban form/layout being fundamental prerequisites
RET O53	Work with all stakeholders in further promoting the asset of Kilcullen's
	townscape and location on the River Liffey.
RET O54	Protect the quality, ambience, vibrancy and vitality of Kilcullen
	Centre by promoting an appropriate mix of day and nighttime uses.

8.7.3 Level 4 - Neighbourhood Centres, Local Centres-Small Towns and Villages

Neighbourhood Centres, Local Centres-Small Towns and Villages are classified as Level 4 in the RSES retail hierarchy. This regional retail hierarchy has not identified retail centres of this scale.

8.7.3.1 Small Town Centres

- Castledermot
- Prosperous
- Rathangan
- Sallins
- Derrinturn
- Kill

There are a number of small-town centres in the Hinterland Area of Kildare that have a range of shopping, non-retail services and, to differing degrees, civic and community functions which render them Small Town Centres in the county context. These comprise Castledermot, Prosperous, Rathangan, Derrinturn, Kill and Sallins and their designations are consistent with those in the Settlement Strategy.

These small towns have compact Retail Core Areas which cater predominantly for the local population while comparison shopping is predominantly carried out in nearby towns designated Level 2 and Level 3. The policies below therefore reflect the aim of consolidating the existing town centres while allowing for further retail to cater for expanding local populations during the life of the Plan.

Objectives

It is an objective of the Council to:

RET O55	Facilitate and encourage the provision of shops and services to consolidate and strengthen the role of Level 4, Tier 1 Small Town Centres in meeting the needs of their existing and expanding populations and those of their rural hinterlands, by responding positively to applications for retail and other town centre developments in Castledermot, Prosperous, Rathangan, Derrinturn, Kill and Sallins where they serve to consolidate the town centres and respect and enhance the existing built fabric.
RET O56	Encourage and facilitate the re-use and regeneration of derelict/underutilised vacant premises, brownfield land, vacant sites for retail and other town centre uses, having regard to the Sequential Approach outlined in the Retail Planning Guidelines.

8.7.3.2 Villages Centres

- Allenwood
- Athgarvan
- Ballitore
- Ballymore Eustace
- Crookstown

- Robertstown
- Straffan

County Kildare includes a number of villages with compact centres. Village centres play an important part in rural community life within the county. By reason of their size and the increasing influence of the larger centres they serve, smaller catchment areas generally have a more limited range and quantity of retail offering. It is considered that these village centres will only witness limited growth in the retail and non-retail services they offer over the life of this Plan. Any enhancement will generally be through infill development and the re-use and regeneration of land and buildings, with quality of design and respect for the character of the village being key requirements. Additionally, these villages have scope to develop/improve their tourism profile within their centres.

Objectives

It is an objective of the Council to:

RET O57	Encourage applications for retail and tourism related development that serve to consolidate and enhance the quality of the village centre.
RET O58	Facilitate the local provision of shops and services that promote vitality in Village Centres in order to meet the needs of existing and expanding populations.
RET O59	Support and facilitate preservation of retail, other services and tourism potential within established rural centres.

8.8 General Retail Policies

In addition to specific policies, a number of general policies are defined to shape retailing in the county during the life of this Plan and beyond. These have been informed by the Retail Planning Guidelines, the Regional Retail Strategy, the Kildare 2025 Economic Development Strategy and the performance of the retail economy in the county in the interim years.

8.8.1 Opening Times

The council supports appropriate and justified opening hours for retail and town centre businesses.

Objectives

It is an objective of the Council to:

RET 060 Require applicants for retail planning consents to confirm their proposed hours of opening. 24 hour opening of shops will only be permitted where it can be clearly demonstrated that there will be no negative impact on the residential amenity of neighbouring areas. Proposed hours of opening for various uses may also be prescribed in Local Area Plans.

8.8.2 Convenience Retailing

The Council supports the appropriate enhancement of the convenience/food shopping offer across all centres of the county. It is a priority of the Council to ensure the sustained vitality, viability and attraction of town centres at all levels of the County Retail Hierarchy. All applications for convenience retailing (other than small scale food stores at neighbourhood centres in the larger towns) will be required to demonstrate that they fully meet the tests of the Sequential Approach. Large convenience stores having an ancillary fashion store and/or stores with a significant range of comparison goods for sale have potential implications for the vitality, viability and attraction of main centres in the County Retail Hierarchy and will be carefully assessed as part of the planning application process with a view to prohibiting or restricting same.

Objectives

It is an objective of the Council to:

RET O61	Require the nature of the comparison component of proposed large
	convenience stores is provided in detail, and a transparent and
	evidence-based Retail Impact Assessment (RIA)/Retail Impact
	Statement (RIS) to be provided with the of retail application.

8.8.3 Corner Shops and Smaller Villages/Settlements

Meeting the retail and community needs of people living in Kildare is an important objective of the Council and is consistent with the objectives of the Retail Planning Guidelines 2012 and the Regional Retail Strategy.

Objectives

It is an objective of the Council to:

RET 062 Support and encourage the retail offering of Smaller Villages/Settlements and traditional local shops in rural centres.

8.9 Enhanced Vitality and Vibrancy of Towns and Villages

The quality of the public realm and the design of new developments can greatly enhance the appeal of an area to shoppers. This emphasis is consistent with the 2012 Retail Planning Guidelines and the accompanying Design Guide Manual.

Objectives

RET O63	Promote investment in public realm improvements within the Core Retail
	Areas and town centres generally, so that shoppers, visitors and tourists
	have a pleasant environment in which to spend time and shop.

RET O64	Ensure that the best quality of design is achieved for all new retail
	development and that it respects and enhances the specific
	characteristics of the towns and villages' townscape, streetscape and
	heritage with particular attention to its scale and the architectural quality
	of the façade, shopfront design, fascia/nameplate and external finishes.

Action

It is an action of the Council to:

RET A1	Pursue all avenues of funding to secure resources for the enhancement, renewal and regeneration of the public realm of the county's towns and villages.
RET A2	Prepare public realm strategies for the Main Streets of Level 2 Town Centres during the course of this plan, and depending on resources, a priority number of Level 3 Town Centres and pursue funding for the implementation of same.

8.10 New Neighbourhood Centres

Kildare has continued to witness one of the largest increases in population in the country since 1996 which has resulted in the development of new residential areas in the county's towns and villages. To respond to the needs of these growing areas of population, the Council recognises that provision for new Neighbourhood Centres may be required in existing and expanding residential areas to ensure that needs are met in a more efficient, equitable and sustainable way, with the former only applicable to the largest centres in the County Retail Hierarchy.

Neighbourhood Centres should complement rather than compete with town centres. In accordance with the Retail Planning Guidelines, their predominant retail role should be mainly convenience, supported by a mix of local, civic, community and non-retail services and a limited quantum of comparison shopping. They would typically be anchored by a small supermarket/general grocery store and have a small range of local shops and services.

Objectives

RET O65	Consider the impact any new neighbourhood centre would have on the vitality and vibrancy of the county's Core Retail Areas (see Maps V1 - 8.1 to 8.11) and to only consider where they would complement and not compete with the established Core Retail Areas.
RET O66	Investigate the need for any additional retail provision in the form of a neighbourhood centre, within existing and expanding residential areas in future Local Area Plans and to zone land accordingly.
RET O67	Implement the 10-minute settlement concept when preparing local area plans to ensure land is zoned for the provision of neighbourhood retail centre uses within reasonable walking and cycling distance of newly planned neighbourhoods.

RET O68	Use assessment criteria for retail developments as outlined in Chapter
	15, Development Management Standards when assessing
	neighbourhood centres.

8.11 Retail Warehouse Parks

Retail warehouse parks comprises units selling mainly bulky household goods which require extensive showroom space. These warehouses are typically grouped around an extensive surface carpark and the parks are generally located on the edge of town centres and/or major road junctions. The Retail Planning Guidelines (2012) state there shall be a presumption against any further development of these out-of-town retail parks save for exception circumstances. Furthermore, the type of goods and size of units should be controlled to protect the vitality and viability of the county's town centres and avoid retail parks emerging as out of centre shopping centres.

Objectives

It is an objective of the Council to:

RET O69	Discourage the development of further out-of-town retail parks.
RET O70	Prohibit mainstream comparison floorspace and discount convenience retail developments in retail parks.
RET O71	Restrict by condition the range of goods sold in retail parks to the sale of bulky goods.
RET O72	Only consider standalone retail units in retail warehouse car parks where they do not detract from the vitality and vibrancy of nearby town centres.

8.12 Retail Development in Business Parks and Employment Areas

Single-use large employment areas, be they business parks or industrial parks and estates, have generally been superseded by more mixed-use sustainable development models that combine working, living, leisure, shopping and local services provision. In addition to being a more sustainable development strategy for major strategic greenfield and brownfield locations, the introduction of local shopping and services provision is an important ingredient in the attraction and competitiveness of such areas. In respect of older employment areas, retail provision will be limited.

Objectives

RET O73	Ensure that the level of convenience retail and local services provision in existing and new major employment areas serves an ancillary supporting role.
RET O74	Provide the land-use and retail planning framework to ensure that the mixed-use strategies for new employment areas respond to the wider context of need and demand in the interests of ensuring that these locations are attractive to workers and employers while supporting and not competing with Core Retail Areas.

RET O75	Limit the level of shopping and local services provision in existing and proposed industrial estates or business parks. Stand-alone mainstream and discount convenience or comparison floorspace will not be permitted in existing and proposed or emerging employment areas, unless it is proven to be part of the wholesale retail market sector such as bathroom showrooms, fireplace/stove showrooms, furniture showrooms, etc.
RET O76	Ensure any further retail floorspace in employment areas will be restricted to meeting the convenience and non-retail services needs of employees rather than facilitating the creation of a new Neighbourhood or District Centres.

8.13 Re-Use and Regeneration of Derelict and Underutilised Land and Buildings

Re-use and regeneration of derelict/obsolete/underutilised land and buildings in town and village centres is a sustainable and desirable objective in helping to preserve and restore the character and quality of centres, particularly when having regard to the vernacular/historical architecture, scale, height, density and massing.

Objectives

It is an objective of the Council to:

I	RET 077	Work with applicants and development interests to explore the potential
		of suitable, available and viable land and buildings for retail and other
		town centre uses across all centres in the County Retail Hierarchy. The
		Council may facilitate and engage in active land management strategies
		so as to encourage regeneration and ensure viable land parcels for retail
		development in preference to edge of centre and out-of-town sites.

Action

It is an action of the Council to:

RET A3 Identify obsolete and potential renewal areas and, through active and positive engagement with landowners, to encourage and facilitate the re-use and regeneration of derelict land and buildings in the county's main towns, villages and smaller centres. The Council will use its statutory powers, including the Derelict Sites Act (as amended), the Vacant Site Levy ⁴ and/or Compulsory Purchase Order, where necessary.

⁴ Action 15.2 of Housing for All identifies the introduction of a new tax to activate vacant land for residential purposes as part of the pathway to increasing new housing supply, which will in time replace the Vacant Site Levy. The Residential Zoned Land Tax (RZLT) was introduced by the Finance Act 2021 and will come into effect from 2024. The principal purpose of the residential zoned development land tax is to encourage the timely activation of serviced lands zoned for residential or mixed-use purposes.

8.14 Retailing in Tourism and Leisure

Kildare is rich in its tourism potential through its natural assets, rivers and canals, built heritage, equine industry and internationally important racecourses, recreational assets, visitor attractions (such as Castletown House, the Japanese Gardens, the National Stud and the Newbridge Silverware Visitor Centre, Burtown House), excellence in its hospitality sector and, more recently, the introduction of the mass appeal of the Kildare Tourist Outlet Village. It is a key priority of the Council to further enhance the attractiveness and competitiveness of Kildare as a tourism and leisure destination.

Objectives

It is an objective of the Council to:

RET O78	Encourage and facilitate the development of retailing in the tourism and
	leisure sectors at appropriate and sustainable locations, subject to
	protecting tourism and leisure amenities from insensitive and
	inappropriate development.

8.15 Garden Centres and Agri-Business Diversification

The profile and mixed-use diversification of existing and new garden centres and agribusinesses has been an increasing trend over the last decade in the county. The Council in principle supports the contribution of such enterprises to the economies of Kildare's rural areas. However, through their expansion and diversification, care must be taken in order to ensure that such developments do not negatively impact the vitality, vibrancy and offering of the county's small towns and village centres.

Objective

It is an objective of the Council to:

RET 079 Require the undertaking of a Retail Impact Assessment/Retail Impact Statement and/or other appropriate studies, for all proposals for new garden centres or agri-businesses or extensions to either (which include retail and restaurant/cafe floorspace) to enable an assessment of their potential impact on nearby small towns and villages, in particular. In addition, such proposals may also require the submission of a Traffic and Transport Assessment, under the TII Traffic and Transport Assessment Guidelines (2014) or any update to same. Where ancillary uses are proposed and where it is considered that such uses would negatively impact upon the vitality and vibrancy of nearby towns and villages, these uses (either in whole or in part) may not be permitted as part of the overall development scheme.

8.16 Casual Trading

The Council will carry out its statutory functions under the Casual Trading Act 1995 and European Union (Casual Trading Act 1995) Regulations 2018, including the issuing of permits and the designation of Casual Trading areas where the Council considers these to be necessary.

Objectives

It is an objective of the Council to:

RET O80	Take cognisance of the proper and sustainable development of the county's towns and villages, including the preservation and improvement of amenities, the safety and convenience of pedestrians and the traffic likely to be generated by Casual Trading and the promotion of tourism.
RET O81	Encourage, support and promote the development and attraction of quality town markets selling artisan food and craft produce in centres at all levels of the County Retail Hierarchy, in recognition of their potential to sustain and increase the attractiveness of town centres and to promote local and more sustainable food sources. The Council will work with SME's in particular to promote/support the provision of such markets in town centre locations over out-of-town locations.
RET O82	Actively and appropriately manage and control temporary, commercial activity involving mobile retail/ café/ food vendor units save where permission has been granted for consent provided by relevant bye-laws.

8.16.1 Outdoor Dining: Section 254 License application

Outdoor dining is an important contributor to the vitality and vibrancy of town and village centres, especially during the Covid-19 pandemic. When assessing license applications, the council will have regard to Section 254 of the Planning and Development Act 2000 (as amended) and the Licensing Outdoor Dining and Seating Guidance Document August 2021 by Kildare County Council. In keeping with Circular Letter PL 06/2021, due consideration must be given at a local level to the principles of Universal Design when assessing a Section 254 licence application to ensure that the wider area is accessible, useable, and convenient to all those who wish to use or pass through it. Every effort must be made to ensure that the design and layout for outdoor seating proposals are universally accessible where practicable.

Objectives

It is an objective of the Council to:

RET 083 Encourage, support and promote outdoor dining facilities that contribute to vitality and vibrancy of centres at all levels of the County Retail Hierarchy, while ensuring these facilities have appropriate layouts, adequate management and contain high quality design components in line with Section 254 of the Planning and Development Act 2000 and the Licensing Outdoor Dining and Seating Guidance Document August 2021 by Kildare County Council.

8.17 Non-Retail Uses in Core Retail Areas and Other Main Streets While the retail offer and attraction of Kildare's main centres has witnessed a significant improvement over the last few decades, the parallel introduction of nonretail and non-desirable retail uses/ lower grade retail uses in Core Retail Areas and other main streets has changed the characteristics and ambience of these centres. These uses may include (but not limited to) amusement/gaming arcades, bookmakers, fast food outlets, budget shops, vape shops, charity shops, telephone/ mobile shops. It is recognised that in the majority of the county's main centres the retail footprints do not meet the requirements of national and international operators and the space provides the opportunity for the introduction of alternative occupiers, often without a planning application for a change of use being required. To maintain the integrity, critical mass of quality retail activity, viability and vitality of Core Retail Areas and other main streets, the Council will seek to discourage an overconcentration of the aforementioned uses in prime retail areas.

Objectives

It is an objective of the Council to:

RET O84	Discourage the proliferation of non-retail uses in Core Retail Areas and other streets, in the interests of maintaining and sustaining the retail attraction of the county's centres.
RET O85	Prevent an over-supply or dominance of fast-food outlets, takeaways, off licences and betting offices along the main streets of the county's towns and villages, within shopping centres and local centres in order to ensure that a balance of all retail services is provided in creating sustainable and vibrant centres.

8.18 Criteria for Assessing Retail Proposals

In accordance with the requirements of the Retail Planning Guidelines 2012, all applications for significant development should be assessed against a range of criteria. These criteria are provided in Chapter 15 of the Plan. As a general rule, developments in excess of 1,000m² (gross) of convenience floorspace and 2,000m² (gross) of comparison will be assessed against the established criteria.

Where an application is made within existing defined Level 2 Major Town or County Town Centres it will not always be necessary to demonstrate the quantitative need for retail proposals. In setting out the retail impact, the focus should be on how the scheme will add/detract from the quality of the town centre in respect of improving the retail offer, urban design, integration with the built fabric and quality of life within the town/centre. An additional consideration should be whether the proposed development has the potential to result in displacement of retail activity from established areas of the town centre. However, this approach only applies to town centres and edge of centre sites.

Objective

RET O86	Assess all applications for all retail development in accordance with the criteria set out above and in Chapter 15, Development Management Standards of this Plan.
RET O87	Note all proposals not in compliance with the County Retail Hierarchy should have a full assessment, specifically in respect of the tests of the Sequential Approach. This guidance is in accordance with that provided in the Regional Retail Strategy 2008.
RET O88	Require applicants to ensure that proposal for retail development which are above the Plan's assessment criteria thresholds demonstrate compliance with the assessment criteria of both the Regional Planning Guidelines 2012 and the Regional Retail Strategy.
RET O89	Require applicants to demonstrate convincingly that their proposal is in compliance with the development plan. Where there is doubt on any aspect of a planning application, the Council will require a detailed justification related to the matter that is not wholly in compliance.