



**Heritage Council's Submission
in relation to the Draft Retail Planning Guidelines (November 2011)**

Introduction

The unique value of [historic] towns and urban areas is recognised in international conventions and charters including UNESCO's 1976 *Recommendation Concerning the Safeguarding and Contemporary Role of Historic Areas* and 2011 *Recommendation on the Historic Urban Landscape*. In addition, best practice charters such as ICOMOS' 1987 *Charter for the Conservation of Historic Towns and Urban Areas* ('Washington Charter') - recognise the value of the economic functioning of historic towns, villages and urban areas. These international best practice charters establish that towns and urban areas have a value as part of our common inheritance in and of themselves, and that the character and qualities that are valued include the functions, traditions and economic activities which take place in urban areas – 'dwelling, making and selling'.

Retail is an intrinsic part of what makes and creates our towns. If urban areas, including and especially our small towns, are to remain economically relevant and are to be given a role and vitality into the future, the functions of the town must be considered as an aspect of their character worth enhancing and conserving. The Heritage Council welcomes in particular the pro-active, planned approach being suggested in the draft guidelines. The provision of retail space has been one of the more obviously rampant forms of development of the recent past, and a more careful and informed approach is now essential, particularly if sustainable development is to be achieved in the long term.

One of the critical resources we possess as a nation is our urban places and spaces, and if we are to send them into the future with their values intact, we must plan and manage them effectively to ensure that they continue to function and to thrive both economically and culturally.

Key Observations and Recommendations:

1. **Management of [historic] Urban Centres** - consideration should be given to the establishment of an Irish Branch of the *International Downtown Association* and/or the *Association of Town Centre Management (ATCM)* – there is no national organisation to support the effective and sustainable strategic management of our [historic] towns and cities - the Heritage Council would be happy to assist in this regard – see Heritage Council's all-island Irish Walled Towns Network initiative (IWTN) and *National Public Realm Plan Programme for Historic Towns* established in 2005 and 2006, respectively - ultimately, the emphasis should be on enhancing **the vitality, vibrancy and viability of our historic city, town and village centres**;
2. **'Sequential Test'**- Consideration should be given to **linking the 'sequential test' to 'vacancy rates'** established through a Town Centre Health Check (TCHC) - where there is a high vacancy rate in the 'historic core/centre' – i.e. **>20%** (in a recession) - development proposals should be steered to town centre sites only;

3. **Town Centre Health Checks (TCHCs)** should be mandatory for the proposed first Tier settlements on an annual basis – support should be provided in this regard – the Heritage Council has started promoting TCHCs in historic towns as a precursor to preparing collaborative Public Realm Plans (PRPs) - see Wicklow TCHC, Balbriggan TCHC, Kilrush TCHC;
4. **Town Centre Health Checks** should be undertaken as part of Retail Impact Statements (RISs) – vacancy rates should be established by a recognised third party and there is a potential role for Irish Universities to support this work;
5. The **'Tipping Point' for Town Centres** should be explored and acknowledged - we now have several towns which have more out of centre retail floorspace than exists in the traditional town centre – e.g. Drogheda and Balbriggan- the role of traditional retail units and independent retailers needs to be protected and enhanced otherwise we will end up with the same high streets as Britain – the guidelines need to protect historic centres where the units have evolved over time as they are now facing fierce competition from purpose built centres and units;
6. **National Town Centre Manager Programme** – should be considered to promote and effectively manage all the stakeholders involved in the management of our [historic] town and city centres – see *NI Town Centre Managers Initiative and NI Branch of ATCM* – various models can be applied – HC would be pleased to assist in this – see also IPI Conference papers from 2010;
7. **National Retail Database (GIS)**– a quality GIS database should be established to provide a robust and reliable 'baseline' for retail planning (convenience, comparison, bulky comparison and empty space) in the State- this database could be utilised by LAs, semi-state orgs, NGOs, Universities, private sector, etc. The cost of running the database could be off-set by an annual Membership fee or linked to the above TCM Programme;
8. **National Retail Ranking Report** – there should be an annual system whereby retail centres (traditional centres and shopping centres) are 'ranked' in terms of their size and performance – similar to other EU countries – for example, please see **Experian Retail Rankings Reports** – can this initiative be expanded into Ireland? – the towns in the UK have a healthy competition each year to try and enhance their 'ranking' – this is also extremely useful in terms of retail planning – in addition, the retail rankings report is the bible in the UK in terms of retail media;
9. **Universities and Urban Studies** – urban studies (including but not limited to retail planning) should be promoted in the universities and should assist and support the regional and local authorities operating within the surrounding area of the university – potential exists whereby universities in the proposed First Tier settlements could be brought together to create an **Urban Taskforce** for the regeneration of those city centres- e.g. Dublin city centre is facing significant pressure from Dundrum Shopping Centre. The impact and projections for shopping on the web should also be assessed.
10. **The Economic Theory on 'Incentives'** needs to be explored in relation to shopping centres v town/city centres – should local authorities build and operate multi-storey parking, what would be the likely impact on rates, etc?...What are the incentives to shop at shopping centres, particularly out-of-town shopping centres – the ESRI and other economic research organisations should be utilised in terms of providing research to inform quality retail planning policies – who is providing the research in Ireland?;
11. **Retail Operators** - the type of retailer operator should also be assessed in depth within Retail Strategies and RISs in terms of the social groups that they target – i.e. ABC1C2DE – information on the 'market position' of retail centres should be explored – a Town Centre Manager Programme would assist in repositioning centres that are struggling or under pressure;

12. **Regional Planning Guidelines** – RPGs should promote the agreed retail hierarchy and propose re-imaging and regeneration strategies for traditional/historic town centres, if required;
13. **County Development Plans** – plans should establish the '*retail hierarchy*' based on sound statistics and data (Retail Strategies) – retail information is in the 'system' somewhere so there should be no excuse for non-evidence based plans any longer – i.e. see recent draft Donegal CDP. Also, the retail strategies should enhance proposed First Tier settlements – i.e. A1 'high-order' retail comparison operators were allowed to go into Dundrum (Harvey Nichols) when ideally they should have only been allowed to trade in Dublin City Centre – retail strategies should be more informed and intellectual...;
14. **LA Retail Strategies** should go further and should promote the preparation and delivery of quality public realm plans, reimagining strategies, where required, etc.
15. **Retail Policy** should feed into a wider *National Urban Policy* which is needed asap, as discussed previously in December 2010.

If you have any queries regarding the above submission, please contact Alison Harvey, Heritage Council, Tel 056 7770777 or aharvey@heritagecouncil.ie.