

**Submission on behalf of Tesco Ireland Limited
Draft Galway County Development Plan 2022-
2028**

September 2020

Contents

1.	Introduction	1
2.	Background	2
3.	Retail Policies	3
4.	Requirements of Retailers	4
5.	Conclusion	7

Prepared By: Muirenn Duffy

Status: Final

Date: September 2020

For and on behalf of Avison Young Planning and Regeneration Limited

1. Introduction

This submission has been prepared by Avison Young on behalf of Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, Co. Dublin in response to the publication of the Issues Paper in preparation of the Galway County Development Plan 2022-2028 (hereafter, Galway CDP). Tesco Ireland, being one of the primary convenience retailers in Ireland, welcomes the opportunity to make a submission on the preparation of the Galway CDP.

The retail sector makes a major contribution to Galway County by increasing the vitality and viability of towns and villages and acting as an economic anchor, creating significant employment and indirect economic and social activity. In this regard, we welcome this engagement by Galway County Council. We would encourage the Local Authority to continue to engage with stakeholders in the retail sector to ensure that there are appropriate policies in the Galway CDP to attract new investment to the county and protect the viability and vitality of existing retail premises within towns and villages.

We would like to take this opportunity to identify the importance of convenience retail facilities in Galway County and highlight the difficulties that can be faced in operating and locating such stores. On this basis we would, therefore, request that, following this submission, Galway County Council provide policies that would promote the development of retail stores of an appropriate scale, at suitable locations across the county.

2. Background

As stated previously, Tesco Ireland is one of the primary convenience retailers in Ireland with 151 stores in cities and towns all across the country. Tesco operates 2 no. stores in the Galway County administrative area and is keen on expanding their presence at appropriate locations across the county. In this regard, this submission is being made to set out the requirements of modern convenience retail operators such as Tesco and set out how the new Galway CDP could attract additional investment in the county in terms of convenience retailing.

The recently published Regional Spatial and Economic Strategy 2020-2032 for the Northern and Western Region (hereafter RSES) identifies a projected population of c. 325,000 for the County of Galway County by the year 2031¹. This would represent a population increase of c. 25% over a 15 year period (2016-2031) with the majority of this increase forecast to be achieved by 2026. In accordance with the objectives of the National Planning Framework as well as the RSES, it is likely that much of this growth will be experienced in urban areas such as the county's settlements with a population greater than 1,500 people. Taking this into consideration, it is important that the Galway CDP accommodates growth by not only providing supportive policies and objectives to provide for residential and employment lands but also the supporting infrastructure and services such as education, commercial, and retail and, specifically in relation to this submission, new convenience retail floorspace at suitable locations.

¹ Regional Spatial and Economic Strategy 2020-2032, Northern and Western Region, pg 17.

3. Retail Policies

As part of the Planning and Development Act 2000, as amended, (hereafter 'the 2000 Act') it is necessary to provide policies and objectives relating to the management of retail development in a county/settlement. It is also a requirement of the 2000 Act that a development plan should accord with any guidelines issued under Section 28 of the 2000 Act. The relevant guidelines in this case are the Retail Planning Guidelines, 2012. These guidelines apply to all planning authorities and seek to ensure that each county and settlement provides an adequate quantum of retail floorspace in their own boundaries, so as to avoid retail leakage to other counties/settlements. Retail leakage can indicate that there is either an impact from a significantly higher order centre (i.e. Galway City) or that the allocation of retail floorspace to a settlement or a county needs to be reviewed so as to reduce the leakage.

Given the predicted growth of urban areas during the lifetime of the new Galway CDP, it is possible that retail leakage could occur and as such it is considered vital that Galway County Council provide policies and objectives as part of the Plan to spur new retail investment in the County's settlements. Retail leakage not only negatively impacts the vitality and vibrancy of communities but can also result in unsustainable travel patterns as people travel, typically by car, to neighbouring settlements for a service that could be offered in closer proximity to their home. As urban areas continue to expand, it is important that the Galway CDP provides guidance on the potential location of convenience retail facilities and provides for flexibility in this regard. Overly prescriptive retail policies, floorspace requirements and zoning objectives can deter potential investment in towns and villages and lead to a scenario whereby a town is underserved by important retail facilities.

As noted in the Galway County Development Plan 2022~2028 Issues Paper, Galway County had a total population of 179,390 in 2016, 2.4% higher than at the last Census (2011). Galway County's population was 12.6% higher than a decade earlier (2006), a greater increase than occurred nationally (12.3%). It is therefore important that Galway County Council considers the existing provision of retail floorspace and considers how additional retail floorspace could be sustainably provided to meet the needs of growing populations and communities.

The National Planning Framework seeks to establish self-sustaining communities throughout the country, and it is considered that the adequate provision of services such as retail will be central to the fulfilment of this objective. The provision of self-sustaining communities throughout the Galway County area can generate employment growth, invigorate town centre areas, promote sustainable travel patterns and contribute to an improved quality of life for residents. In this regard, we would request that the Local Authority considers the future provision of retail convenience floorspace holistically and ensures that settlements are adequately served by such floorspace. The inclusion of supportive policies and flexible land use zoning objectives would be welcomed by retail operators such as Tesco Ireland.

The preparation of a retail strategy for the county in accordance with Objective R3 of the Galway County Development Plan 2015-2021 would also be welcomed. A retail survey and strategy could assess current retail provision in the county and explore ways to enhance the retail environment in a sustainable manner. Such a strategy could also consider the requirements of modern convenience retail operators, current trends in the retail market and new policy objectives that will spur growth in the sector whilst protecting the viability of existing Centres.

4. Requirements of Retailers

Retailing, and convenience retailing in particular, has very specific requirements relating to the access, servicing, shape, size, and morphology of sites. Typically, convenience retailers will require extensive open areas of floorspace with associated car parking. In this regard, it is noted that many of Galway's primary settlements are made up of historic buildings, many of which are often comprised of irregular floor layouts or are subject to changes in floor levels. These units are, therefore, not consistent with modern retail convenience layout requirements, which typically require large unobstructed and level floorplates. Where sites with these characteristics become available in or around town centre areas, it is important that the Local Authority considers the provision of convenience retailing facilities on these sites. Where no such sites are available or they are designated for other uses, alternative lands that are sequentially appropriate should be identified for retail convenience uses. Flexible land use zonings should also be considered, when identifying potential sites for retail convenience developments.

Additionally, convenience retail stores typically require a large quantum of car parking spaces to serve customers who are doing their weekly shop and are, therefore, unable to transport their goods without the use of a private motor vehicles. This is acknowledged in the Retail Planning Guidelines as the weight of a weekly convenience shopping results in public transport or walking not being an option². Furthermore, the delivery process typically undertaken by large convenience retailers, involves large goods vehicles which would generally not be suited to using roads in tight urban grain areas. On this basis, a town centre location may not always be a viable option for commercial retailers when they are pursuing a new site and other locations such as edge of centre sites may have to be considered.

Whilst a retailer must of course comply with the requirements of planning legislation/guidance and those of a Local Authority, it is also important to consider and facilitate the requirements of the customer which includes providing a site layout/design that is efficient and welcoming. To ensure the best quality products are available for customers, particularly fresh food, it is also important that an efficient back of house area is provided.

Many modern retailers operate to an established business model that is capable of delivering competitive goods to customers at accessible locations. These models have some flexibility with regard to the overall scale of the store and the physical layout of the building. However, certain aspects of this model such as accessibility and retailer profile are fundamental to successful operation.

An array of factors will determine the attractiveness of a location for new retail development and these should be considered as part of the Galway CDP. These factors include:

- Quality of the public realm;
- Retail layout achievable;
- Traffic management & movement strategy;
- Servicing / deliveries & accessibility;
- Height /mix of uses;
- Car parking;

² Guidelines for Planning Authorities: Retail Planning, April 2012, Section 4.11.1, pg. 35.

- Health and safety; and,
- Planning policy restrictions.

In order to attract retailers, it will be important for the Galway CDP to reflect the fact that modern stores are designed to be efficient, spacious and provide a pleasant environment for both colleagues and consumers alike.

The standard back of house requirements, for convenience retailers in particular, that are necessary to ensure the efficient operation of a supermarket include, *inter alia*, a cage marshalling area, bulk storage, staff facilities, offices and administration areas. In addition to these requirements, the design of any building must also have regard to the current Building Regulations, Disability Access and Fire Safety Requirements, underpinned by the principles of Universal Design.

Back-of-house areas are now designed to minimise the need for multiple deliveries per day by providing adequate chilled and ambient storage areas for holding stock before it reaches the store shelves. In addition, central distribution systems remove the need for individual suppliers to visit stores (rather their products are delivered to a central warehouse where the products are organised and redistributed to individual stores) thereby reducing the number of deliveries to a store. This system is environmentally sustainable as it allows for a single truck to provide multiple stores with a range of products, which in the absence of this system would require several separate truck deliveries.

The necessary back-of-house areas often required to ensure the efficient operation of a modern supermarket is outlined in Table 2 below. For example, while it is not strictly required to have an enclosed cage marshalling area within the footprint of a building, it is often enclosed when adjacent to residential areas to ensure that there is little visual or noise impact associated with the movement of roll cages within the service yard.

Table 1: Needs of a modern retail convenience store

Description	Reason for Requirement
Cage Marshalling Area	<ul style="list-style-type: none"> • To facilitate the safe unloading of a full HGV directly undercover. • To avoid stock being exposed to the elements. • To reduce noise levels normally associated with this activity. • To provide Health & Safety benefits for staff. • To provide an area for sorting and recycling waste and packaging. • To facilitate speedy offloading and HGV turn-around.
Back-up Chiller	<ul style="list-style-type: none"> • To ensure continuity of chill chain. • To ensure that chilled products are maintained at the correct temperature after delivery and before packing out on the sales floor. • The size is designed to meet seasonal peaks.
Fresh Meat Chiller	<ul style="list-style-type: none"> • Required by trading law. • A back-up freezer is provided for frozen food products. • The size must meet the requirements of seasonal peaks.
Alcohol Storage Area	<ul style="list-style-type: none"> • To ensure that alcohol is stored in a secure area with access limited to specific staff.
Ambient Food and Non-	<ul style="list-style-type: none"> • To provide sufficient space to facilitate sorting of deliveries and storage per

Food Storage Area	<p>category.</p> <ul style="list-style-type: none"> • This is essential to prevent cross contamination. • A separate clothing storage area is provided. • A separate secure storage area is provided to protect high value goods.
Cleaner's Room	<ul style="list-style-type: none"> • Provided in line with Environmental Health requirements. • To accommodate all cleaning machines, equipment and chemicals. • To avoid any potential cross contamination.
Staff Kitchen, Restaurant, Lockers, Changing Areas	<ul style="list-style-type: none"> • In the interest of staff amenity.
Ladies' & Gents' WC, Accessible WCs	<ul style="list-style-type: none"> • All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design.
Store Manager's Office	<ul style="list-style-type: none"> • In the interest of staff amenity.
Staff Training Room	<ul style="list-style-type: none"> • To facilitate on-site training and up-skilling.
General Office	<ul style="list-style-type: none"> • General office to facilitate IT, stock and ordering and general administration.
Lifts and Access Stairs	<ul style="list-style-type: none"> • All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design.
Circulation Areas	<ul style="list-style-type: none"> • All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design.
Fresh Food Counter	<ul style="list-style-type: none"> • To comply with various Environmental Health requirements. • This includes physical separation between cooked and uncooked food. • This includes direct access to back-up chiller.
Bakery	<ul style="list-style-type: none"> • An in store bakery is provided complete with ovens, storage and manufacturing area in compliance with various Environmental Health requirements.

In addition to the above, it is also worth highlighting the role 'click and collect' facilities are likely to play in the near future. Such facilities have relatively small spatial requirements, usually within dedicated areas of the customer car park, but provide an important service that is likely to become increasingly popular to customers, particularly as health and other concerns continue to influence people's shopping habits.

Having regard to the above, it is requested that the policies in the Galway CDP recognise that the design of modern retail formats are dictated by retailer's requirements, current Building Regulations, Fire Safety and Disability Access requirements. Each of these regulations necessitates extra space requirements (circulation space, staff facilities, service yard/layout requirements etc.) which traditionally would not have been required in similar type retail stores.

In this regard, policies which provide flexibility and allow for the development of modern convenience retail unit s should be included in the Galway CDP. Such policies would be particularly relevant in the larger settlements of the county and would attract modern format retailers, thus providing an essential local service for the community. Such an approach will provide for the needs of the Local Authority, the retailer and the public. Furthermore, they would also ensure that retail leakage into neighbouring counties or larger settlements is reduced as well as making towns more sustainable and attractive to prospective employers and residents.

5. Conclusion

Our Client welcomes the ongoing review of the Galway County Development Plan and the opportunity to comment on the preparation of a new Plan for the County. Tesco Ireland, as a primary convenience retailer in the county is committed to meeting the needs of its customers and contributing to the physical and social environment of the county's primary settlements. As the county's population continues to expand over the next decade, it is important that the Local Authority provides for additional retail convenience centres at appropriate locations that serve the needs of current and future residents. In this regard, it is requested that as part of the Galway County Development Plan 2022-2028, the Local Authority:

1. Provides Flexible land use zoning objectives that will allow sites to be brought forward for convenience retail development over the lifetime of the Plan.
2. Includes policies and objectives that can spur investment in the convenience retail sector and provides for adequate convenience floorspace to be allocated in settlements across the county.
3. The requirements of modern retailers including appropriate floorplates, car parking and servicing access should be acknowledged and where possible, the Galway CDP and associated Retail Strategy should include reference to these requirements.

We trust that the matters outlined above will be taken into consideration as part of the preparation of the Galway County Development Plan 2022-2028. We are available for discussion on any of the matters referred to above and would also appreciate if you could confirm receipt of this submission by return.

Yours sincerely,



Muirenn Duffy
Associate Director
(01) 661 8500
For and on behalf of Avison Young Planning and Regeneration Limited

Contact Details

Enquiries

Muirenn Duffy

(01) 661 8500

muirenn.duffy@avisonyoung.com

Visit us online

avisonyoung.com