

Submission on behalf of Tesco Ireland Limited

Draft Longford County Development Plan 2021-2027

January 2021

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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 Draft Longford County Development Plan 2021-2027 (hereafter, Draft Longford CDP). Tesco Ireland, being one of the primary convenience retailers in Longford, welcomes the opportunity to make a submission on the Draft Longford CDP.

The retail sector makes a major contribution to Longford by increasing its vitality and viability and acting as an economic anchor, creating significant employment and indirect economic and social activity. In this regard, we welcome this opportunity to engage with Longford County Council. In addition, we would encourage the Local Authority to engage with stakeholders in the retail sector to ensure that there are appropriate policies in the Longford CDP to attract new investment in the county, protect the viability and vitality of existing retail premises and accommodate refurbishment and expansion of the older premises.

We would like to take this opportunity to identify the importance of convenience retail facilities across the county and request that Longford County Council includes appropriate retail policies and land use zoning objectives in the Longford CDP 2021.

2. Background

Tesco Ireland is one of the primary convenience retail operators in Longford Town and one of the largest private sector employers in the State. Given the projected population growth in the County's primary towns, it is considered that there is scope over the period of this plan and to enhance and expand existing retail facilities.

As highlighted in the Draft Development Plan, the population of County Longford is expected to increase from the 2016 figure of 40,873 to 43,187 by 2021 and then to further increase to 45,800 by 2027. Longford Town, which is recognised as a Key Town in the RSES Settlement Hierarchy, is identified within the Draft Plan as the settlement targeted for the most growth over the Plan period. It is noted that a key principle of the Settlement Strategy, is the need for a more balanced network of higher-order towns in the Settlement Hierarchy to support the role and function of Longford Town as the principal economic driver and focus of investment for the county. In this regard, the Draft Plan notes that growth is expected for the settlements of Edgeworthstown and Ballymahon, both denoted as Self-Sustaining Growth Towns in the Settlement Hierarchy, with each growing in population terms by c. 25% of Longford Town's equivalent population growth up to 2027. Lanesborough and Granard are both also designated as Self-Sustaining Towns and are each expected to grow by c. 15% of Longford Town's population growth over the same period.

Taking the above into consideration, it is important that the Longford CDP accommodates growth in these settlements 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, retail and specifically scale-appropriate new convenience retail floorspace at suitable locations across its jurisdiction.

Of equal importance is to support established retail facilities that provide an important service to their respective communities. It is imperative that the Longford CDP 2021 acknowledges their importance through supportive zoning objectives and general retail policy, to ensure that these facilities can continue to provide for the needs of expanding catchment areas.

3. Supportive Retail Policies

Given the projected population increase of county Longford and its key settlements, it is submitted that the future provision of retail facilities and enhancement of existing centres should be considered and facilitated as part of the new Longford CDP. It is important that new residential growth areas are adequately served by retail facilities and as such it is requested that Longford County Council provide flexibility with regard to zoning policies to facilitate the provision of scale-appropriate retail floorspace at appropriate locations.

A key objective of the NPF is to establish self-sustaining communities throughout the country and it is considered that the adequate provision of services, such as convenience retail and ancillary retail services, will be central to the fulfilment of this objective. The provision of self-sustaining communities throughout the County 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 to ensure 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 importance of supporting existing retail operators should also not be overlooked as part of the finalisation of the Longford CDP. This includes the safeguarding of delivery and access routes and spaces to undertake deliveries. Tesco currently operates a central distribution system for deliveries, which involves the consolidation of individual supplier products at a central warehouse where the products are organised and redistributed as part of a complete delivery. This form of delivery system is currently operated by all the main supermarket chains and is an exemplar in terms of transportation management and environmental sustainability.

Tesco supports urban renewal, public realm and transport improvement schemes and encourages sustainable modes of transport, from customer and staff journeys to HGV deliveries. However, deliveries and in particular early morning deliveries, are an important aspect of the central distribution system and must be protected. Such deliveries not only ensure consistent product quality and availability but also reduce the number of delivery trucks on the road network at peak times, when traffic congestion is at its highest. In order to accrue all the benefits of the central distribution system, from product availability to a reduction in the number of delivery vehicles on the roads, restrictions on deliveries must be avoided. Additionally, adequate loading bay facilities and access routes should be maintained, particularly in dense urban areas, to ensure the commercial viability of retail premises. A failure to accommodate deliveries could have a detrimental impact on such premises.

We would request that the delivery requirements of convenience foodstore operators are acknowledged and that policies providing for deliveries, including early morning deliveries should be provided. Such an approach will promote the likelihood of retail development in the County and will ensure that existing stores can continue to offer their customers a high-quality product.

In addition to the above, the preparation of an updated Retail Strategy for Longford is welcomed. The Draft Strategy notes that there is a requirement for at least an additional 4,067m² of convenience retail floorspace between 2021 and 2027. The Draft Strategy notes that the healthcheck analysis appear to indicate that, in spite of obvious and substantial difficulties in retail sector over the last 6 years relating to vacancy rates and an underdeveloped market, the main settlements in County Longford continue to provide the necessary retail services required by their communities.

As part of the Draft Retail Strategy, an initial baseline projection for additional floorspace requirements for the period to 2030 for the County is provided and has been formulated to include adjustments for existing vacancy levels, as well as a frictional vacancy rate of 10% to ensure vital choice and competition in the market. In keeping with advice provided in the Retail Planning Guidelines, it is welcomed that the Draft Retail Strategy recognises that the estimates provided will not act as caps on the provision of future floorspace or be treated in any way prescriptively, but rather be used to guide the general scale of overall retail provision. This is welcomed, as quantitative limitations can be undermined by a range of factors which can change significantly over the short to medium term, and so it is important that these figures are not interpreted as caps.

In this regard, while it is acknowledged in the text that the figures presented guide the general scale of retail provision rather than act as a cap on retail permissions, it is requested that the Local Authority makes it clear on the tables provided that these figures are 'best estimates' and that future convenience retail proposals in the County will be assessed on their merits, with the primary considerations being their location, potential local impact and whether they accord with relevant planning policy such as the site's zoning.

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, larger convenience retailers will require extensive open areas of floorspace with associated car parking. In this regard, it is noted that, characteristically, town centre areas are comprised of historic buildings, many of which are often comprised of irregular floor layouts or are subject to changes in floor levels which may be more appropriate for smaller format convenience retail stores. Generally, modern larger retail convenience layouts require unobstructed and level floorplates and where sites with these characteristics become available in or around town centre areas, it is important that the Local Authority recognise these sites are suitable for accommodating the provision of convenience retailing facilities, rather than having to rely on consolidating the existing urban fabric to try and achieve a suitable conforming site. 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 option¹. Furthermore, as outlined previously in this submission, the delivery process typically undertaken by large convenience retailers, involves large goods vehicles which are 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 larger convenience 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 and 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.

¹ Guidelines for Planning Authorities: Retail Planning, April 2012, Section 4.11.1, pg. 35.

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

- Quality of the public realm;
- Retail layout achievable;
- Traffic management & movement strategy;
- Servicing / deliveries & accessibility;
- Height /mix of uses;
- Benefits of an improved locale through the development of a site;
- Car parking;
- Health and safety; and,
- Planning policy restrictions.

In order to attract retailers, it will be important for the Longford CDP to reflect 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, colleague 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 1 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.

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 limited access to specific staff.
Ambient Food and Non-Food Storage Area	<ul style="list-style-type: none"> To provide sufficient space to facilitate sorting of deliveries and storage per category. 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 Longford CDP recognise that the design of modern retail formats are dictated by retailers' 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 and land use zonings which provide flexibility and allow for the development of modern convenience floorspace and enhancement of existing retail units should be included in the Longford CDP. Such an approach will provide for the needs of the Local Authority, the retailer and the public.

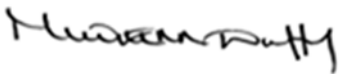
5. Conclusion

Our Client welcomes this opportunity to comment on the Draft Longford CDP and looks forward to the publication of the finalised Longford County Development Plan 2021-2027. Tesco Ireland is committed to meeting the needs of its customers and contributing to the physical and social environment of Longford Town. As the population of Longford's settlements continue to expand over the next decade, it is important that enhancements to existing stores and new convenience retail floorspace are accommodated at appropriate locations by the Local Authority to serve the needs of current and future residents.

Furthermore, this submission requests that flexible zonings be provided to ensure the retail function of Longford's primary settlements can be strengthened. In addition, the requirements of modern retailers should be acknowledged where possible, with the Longford CDP and associated Retail Strategy including references to these requirements.

We trust that the matters outlined above will be taken into consideration as part of the finalisation of the Longford County Development Plan 2021-2027. We are available for discussion on any of the matters referred to above and would appreciate if you could confirm receipt of this submission by return.

Yours sincerely,



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