

# **Submission on behalf of Tesco Ireland Limited**

## **Draft Louth County Development Plan 2021-2027**

December 2020

# Contents

1.	Introduction .....	3
2.	Background.....	4
3.	Supportive Retail Policies.....	5
4.	Appropriate & Relevant Zoning Objectives .....	7
5.	Requirements of Retailers .....	8
6.	Conclusion.....	12

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**Status: Final**

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

The retail sector makes a major contribution to Louth's urban areas by increasing their 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 Louth 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 Louth 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 Louth County Council includes appropriate retail policies and land use zoning objectives in the Louth CDP 2021.

## 2. Background

Tesco Ireland is one of the primary convenience retail operators in Louth and one of the largest private sector employers in the State. Tesco currently operates 4 no. stores between Drogheda and Dundalk. 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 National Planning Frameworks Implementation Roadmap provides that Louth's projected population, in conjunction with the permitted 25% headroom, will be in the range of 141,500 – 148,375 persons by 2026. Using the higher projected growth rate and factoring into the equation that this Plan runs from 2021 to 2027, the population projection for the County in 2027 is 149,966 persons, representing an increase in population of 21,082 on the 2016 Census figure. It is further noted that the strategically located settlements of Drogheda and Dundalk will continue to grow into centres of scale and create a critical mass of population that will enable them to fulfil their function as regional drivers of economic and population growth, with a targeted population 50,000 by 2031.

Taking the above into consideration, it is important that the Louth 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 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. To ensure these facilities can continue to provide for the needs of expanding catchment areas, it is imperative that the Louth CDP 2021 acknowledges their importance through supportive zoning objectives and general retail policy.

### 3. Supportive Retail Policies

Given the projected population increase in Louth's primary 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 Louth CDP. It is important that new residential growth areas are adequately served by retail facilities and as such it is requested that Louth 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 Louth 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, in relation to deliveries, and in particular early morning deliveries, these 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 occurring 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 Louth is welcomed. As part of the Draft Strategy, a quantitative analysis of the estimated amount of retail floorspace required for Drogheda, Dundalk and Ardee is provided. The Retail Strategy notes that the estimates of future requirements for retail floor space provided by the strategy are intended to provide broad guidance as to the additional quantum of convenience and comparison goods floor space provision. As noted in the Draft Strategy, it is important that the estimates provided do not act as caps on the provision of future floorspace or be treated in any way prescriptively. Quantitative limitations can be undermined by a range of factors which can change significantly over the short to medium term and as such it is important that these figures are not interpreted as caps.

In this regard, while it is acknowledged that the figures are indicative, it is requested that the Local Authority makes it clear 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 sites zoning.

## 4. Appropriate & Relevant Zoning Objectives

It is noted that as part of the Draft Louth CDP, the 'Town Centre Retail' zoning objective previously set out under the Dundalk and Environs Development Plan 2009-2015 for the Longwalk Shopping Centre site, is proposed to be replaced by 'D1 Regeneration' zoning objective.

The Draft Louth CDP notes that the objective for Regeneration (D1) zoned lands is;

*"to facilitate social, economic and physical regeneration and/or rejuvenation of an area or specific lands".*

However, given the importance of the subject site, its established use, and location within the retail core area, it is requested that the Longwalk Shopping Centre be included within the B1 zoning objective 'Town or Village Centre', with a specific local objective which seeks to promote the regeneration of the lands rather than the proposed rezoning of the site.

In terms of the proposed Regeneration zoning, the Draft Plan notes that the potential uses of the lands in these zones are specific to the location of each area or piece of land and can include residential, commercial, business, retail, employment or community uses. Given the wide-ranging nature of the Regeneration zoning objective, specific permitted in principle uses have not been provided in the Draft CDP. A list of uses considered to be 'open for consideration', are however included, and it is noted that this list does not provide for uses such as Off-licence or Supermarket/Shop (Convenience)  $\leq 1500\text{m}^2$ / Shop (Convenience)  $\geq 1,500\text{m}^2$ .

While the overall aim of to encourage the regeneration of the Longwalk Shopping Centre is welcomed, it is considered that the objectives of the D1 Regeneration zoning could also be promoted under the B1 Town Centre zoning objective.

In light of the above and given the importance of large-scale retail convenience facilities to established local communities such as Dundalk, it is considered that the Local Authority should ensure that policies provided in the Louth CDP support any existing uses at key locations such as Longwalk Shopping Centre and we request that the Town Centre zoning objective for this site be maintained.

## 5. 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 typically 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. Typically 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 option<sup>1</sup>. Furthermore, as outlined previously in this submission, 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 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.

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<sup>1</sup> 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 Louth 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 Louth 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"> <li>To facilitate the safe unloading of a full HGV directly undercover.</li> <li>To avoid stock being exposed to the elements.</li> <li>To reduce noise levels normally associated with this activity.</li> <li>To provide Health &amp; Safety benefits for staff.</li> <li>To provide an area for sorting and recycling waste and packaging.</li> <li>To facilitate speedy offloading and HGV turn-around.</li> </ul>
Back-up Chiller	<ul style="list-style-type: none"> <li>To ensure continuity of chill chain.</li> <li>To ensure that chilled products are maintained at the correct temperature after delivery and before packing out on the sales floor.</li> <li>The size is designed to meet seasonal peaks.</li> </ul>
Fresh Meat Chiller	<ul style="list-style-type: none"> <li>Required by trading law.</li> <li>A back-up freezer is provided for frozen food products.</li> <li>The size must meet the requirements of seasonal peaks.</li> </ul>
Alcohol Storage Area	<ul style="list-style-type: none"> <li>To ensure that alcohol is stored in a secure area with limited access to specific staff.</li> </ul>
Ambient Food and Non-Food Storage Area	<ul style="list-style-type: none"> <li>To provide sufficient space to facilitate sorting of deliveries and storage per category.</li> <li>This is essential to prevent cross contamination.</li> <li>A separate clothing storage area is provided.</li> <li>A separate secure storage area is provided to protect high value goods.</li> </ul>
Cleaner's Room	<ul style="list-style-type: none"> <li>Provided in line with Environmental Health requirements.</li> <li>To accommodate all cleaning machines, equipment and chemicals.</li> <li>To avoid any potential cross contamination.</li> </ul>
Staff Kitchen, Restaurant, Lockers, Changing Areas	<ul style="list-style-type: none"> <li>In the interest of staff amenity.</li> </ul>
Ladies' & Gents' WC, Accessible WCs	<ul style="list-style-type: none"> <li>All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design.</li> </ul>
Store Manager's Office	<ul style="list-style-type: none"> <li>In the interest of staff amenity.</li> </ul>
Staff Training Room	<ul style="list-style-type: none"> <li>To facilitate on-site training and up-skilling.</li> </ul>
General Office	<ul style="list-style-type: none"> <li>General office to facilitate IT, stock and ordering and general administration.</li> </ul>
Lifts and Access Stairs	<ul style="list-style-type: none"> <li>All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design.</li> </ul>

Circulation Areas	<ul style="list-style-type: none"> <li>All sized in order to comply with Building Regulations, Disability Access requirements and the principles of Universal Design.</li> </ul>
Fresh Food Counter	<ul style="list-style-type: none"> <li>To comply with various Environmental Health requirements.</li> <li>This includes physical separation between cooked and uncooked food.</li> <li>This includes direct access to back-up chiller.</li> </ul>
Bakery	<ul style="list-style-type: none"> <li>An in store bakery is provided complete with ovens, storage and manufacturing area in compliance with various Environmental Health requirements.</li> </ul>

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 Louth 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 Louth CDP. Such an approach will provide for the needs of the Local Authority, the retailer and the public.

## 6. Conclusion

Our Client welcomes this opportunity to comment on the Draft Louth CDP and looks forward to the publication of the finalised Louth County Development Plan 2021-2027.

In relation to the proposed rezoning of the Longwalk Shopping Centre site from Town Centre to Regeneration, it is considered more appropriate that the Town Centre zoning objective be maintained in recognition of the established uses and location within the retail core and a site specific local objective be included to promote the regeneration of the Centre. In this regard, it is requested that the Local Authority carefully considers the zoning objectives set out as part of the Draft Louth CDP and that established uses are recognised in planning policies to ensure the long term viability of uses, which provide an important local service.

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

We trust that the matters outlined above will be taken into consideration as part of the finalisation of the Louth 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,

**Muirenn Duffy**  
**Associate Director**

**For and on behalf of Avison Young Planning and Regeneration Limited**