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# **Draft Limerick Development Plan 2022-2028**

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

August 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 Limerick Development Plan 2022-2028 (hereafter 'Draft Development Plan'). Tesco, being one of the primary convenience retailers in Ireland, welcomes the opportunity to make a submission on the Draft Development Plan.

The retail sector makes a major contribution to Limerick County, by increasing the vitality and viability of its towns and villages, and acts as an economic anchor, creating significant employment and indirect economic and social activity. In this regard, we welcome this opportunity to engage with Limerick City and County Council. We would encourage the Local Authority to continue to engage with stakeholders in the retail sector to ensure that appropriate policies and objectives are brought forward in the new Development Plan that will attract new investment to the County and protect the viability and vitality of retail premises within towns and villages.

We take this opportunity to identify the importance of convenience retail facilities in Limerick County and their contribution to town centre regeneration, and to highlight the requirements needed to locate and operate such stores. On this basis, we would therefore request that, following this submission, Limerick City and County Council provides policies that support existing retail stores and promote the development of retail stores of an appropriate scale, at suitable locations across the County, in accordance with the projected population growth of the County.

## 2. Background

As stated previously, Tesco Ireland is one of the primary convenience retailers in Ireland with over 150 no. stores in cities and towns nationwide. The Tesco business model includes 'bricks and mortar' stores, Grocery Home Shopping and Click and Collect services, with a supporting distribution network. Tesco currently operates 6 no. stores in Limerick and given the projected population growth for the County - it is considered that there is scope to provide additional stores at appropriate locations to serve the County's increasing population and to improve and expand existing retail facilities.

New and existing retail locations are a key consideration for the new Development Plan, particularly in terms of serving its large and increasing population, providing employment, contributing to placemaking and attracting additional investment into the County.

The Draft Development Plan projects both a low and high population growth scenario in Limerick, increasing from 195,000 persons in 2016 to 246,000 (low) or to 256,500 (high) persons by 2031, an increase of up to 61,500 persons.<sup>1</sup> The proposed population figures for the County align with the National Planning Framework (hereafter 'NPF') and the Regional Spatial and Economic Strategy for the Southern Region (hereafter 'RSES') population targets. In accordance with the objectives of the NPF as well as the RSES, the Draft Development Plan sets out that it is likely that a significant portion of the growth will be experienced in the Limerick City Metropolitan Area including Annacotty and Mugret with an increase of 34,177 persons by 2028. The key town of Newcastle West is expected to see a population growth of 2,455 persons by 2028 (30% growth over the 2016 population). Furthermore, the Level 3 (Abbeyfeale, Castleconnell, Rathkeale, Caherconlish) and Level 4 Towns are to account for 28% of the total population growth.<sup>2</sup>

Taking this into consideration, it is important that the new Development Plan for Limerick accommodates this 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, retail and specifically new convenience retail floorspace at suitable locations across its administrative area.

Of equal importance is to support established retail facilities that provide an important service to their respective communities. It is imperative that the new Development Plan 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.

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<sup>1</sup> Draft Limerick Development Plan 2022-2028, Chapter 2: Core Strategy, pg. 20

<sup>2</sup> Draft Limerick Development Plan 2022-2028, Chapter 2: Core Strategy, pg. 24

### 3. Planning & Vision

As part of the Planning and Development Act 2000 (as amended) (hereafter 'the Act'), it is necessary to provide policies and objectives relating to the management of retail development in a County/settlement. The Act also sets out that a Development Plan should accord with any guidelines issued under Section 28 of the Act. The relevant guidelines in this case are the Retail Planning Guidelines, 2012. These guidelines are common for all Local 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 or that the allocation of retail floorspace to a settlement or a County needs to be reviewed so as to reduce the leakage.

From a high level comparative analysis of a number of the County's settlements, it is considered that some settlements are currently underserved by convenience retail floorspace and that, in some instances, trade may be lost to neighbouring larger settlements. In addition, it is clear that there is potential for additional convenience retail in some of the settlements in the County, given their projected population growth over the lifetime of the Plan.

A Draft Retail Strategy for the Limerick-Shannon Metropolitan Area and County Limerick 2022-2028 is included in the Draft Development Plan. The Draft Strategy sets out that there is a requirement for an additional c.18,583m<sup>2</sup> of convenience retail floorspace up to 2028 for the City and County of Limerick.<sup>3</sup> As per the advice provided within the Retail Planning Guidelines, the Draft Retail Strategy recognises that the estimates provided will act as broad guidelines on the allocation of additional floorspace and not as 'caps'. This is welcomed, as quantitative limitations can be undermined by a range of factors which can change significantly over the short to medium term.

While it is acknowledged in the text that the figures presented guide the general scale of retail provision, rather than acting as a cap on retail floorspace provision, it is requested that the Local Authority ensures that clarity is provided within the new Development Plan so that the aforementioned floorspace figures are considered as estimates and that future convenience retail proposals in Limerick City and County will be assessed on their individual merits. As such, it is imperative that a prescriptive cap is not placed on additional retail convenience floorspace over the Plan period.

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<sup>3</sup> Draft Limerick Development Plan 2022-2028, Volume 6: Draft Retail Strategy for Limerick, pg. 137

### 3.1 Strategic Narrative

The Draft Development Plan sets out that the County's population figure is projected to grow by over 30% to c.256,500 persons (high scenario) to 2031. The projected levels of population demonstrate that the County will continue to grow at a rapid rate. Such increases in the County's future population also bring with them an increased demand for associated services including housing, education, community and retail. The new Development Plan coming forward for the County and City, as well as future Development Plans, must ensure that its policies and objectives are sufficiently strategic and robust in nature in order to appropriately accommodate its increasing population and to provide for the increasing demand for services.

As one of Ireland's leading convenience retailers, Tesco occupies an established position within the retail sector. Given its importance within the retail sector, particularly convenience retailing, Tesco is suitably positioned to bring forward an increased level of convenience retail floorspace within the County that could serve the ongoing rise in population both over the lifetime of the new Plan and beyond.

As part of its ongoing store location programme, Tesco is reviewing opportunities to sustainably grow its business at appropriate locations within the County across a range of formats. Such opportunities, and attendant investment would positively contribute to the overall development of the County.

Tesco is reviewing opportunities within the County in a range of formats that would support positive planning, economic and regeneration outcomes, in accordance with both national and regional policy. New convenience retailing can help to enhance the vitality and viability of Town Centres by complementing the overall business mix in such centres. It can assist with physical regeneration through the redevelopment of vacant and/or under-utilised sites, thereby contributing to the aims of compact urban forms and providing attractive townscapes. Retail stores that are located adjacent or in proximity to Town Centres can also positively assist with urban regeneration, for example, through the development of strategically located sites. Larger format stores have the advantage of offering a greater product range, provision of grocery home shopping hubs and Click and Collect facilities along with the opportunity to avail of a range of shopping channels. Larger store formats also promote sustainable modes of transport such as electric vehicle charge points and cycle parking for customers.

Economic and community benefits are very much interlinked with the delivery of convenience retail through job creation and community supports. For example, Tesco donates up to €1,000 every 8 weeks to 3 local charities/causes through its Community Fund, and works with FoodCloud, and local charitable groups, to redistribute surplus food at the end of each day to families in need. Tesco's store network nationwide also creates significant indirect benefits at a local level, including supporting local food and drink suppliers and service providers, and increasing footfall in settlements.

The Draft Development Plan can facilitate the delivery of new store locations, investment and job creation throughout the County through the implementation of a suitably robust retail policy framework that would promote store locations both within town centres and on the edge of settlements. This policy approach will, in turn, help to contribute to the economic growth of the County over the lifetime of the Plan, while also aligning with overarching national and regional planning policy objectives such as compact growth and revitalising urban areas.

## 4. Supportive Retail Policies

Given the projected population increase of the City and County, 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 Development Plan for Limerick. It is important that new residential growth areas are adequately served by retail facilities and as such, it is requested that the Local Authority provide flexibility with regard to zoning policies in order to facilitate the provision of scale-appropriate retail floorspace at appropriate locations.

In respect of facilitating new retail development, it is important that when sites are not available in town centre locations that consideration is given to edge of centre sites, as the town centre cannot always accommodate the new retail development due to site constraints such as plot size, site layout, parking requirements, delivery access etc. When suitable sites are not available in the town centre, edge of centre sites must be considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorplate.

Tesco currently has a store location at Coonagh Cross Shopping Centre and we take this opportunity to highlight that there appears to be an anomaly within the Draft Development Plan in respect of this location/zoning. The Draft Development Plan text as refers to Coonagh Cross Shopping Centre as being a 'District Centre' at Section 4.6.4 'District Centres' (Page 70) with Policy ECON 03 applicable. However, the associated Land Use Zoning Map provided within the Draft Development Plan designates Coonagh Cross as being a 'Local Centre' as illustrated by the zoning map extract at Figure 1 (Coonagh Cross Shopping Centre circled).

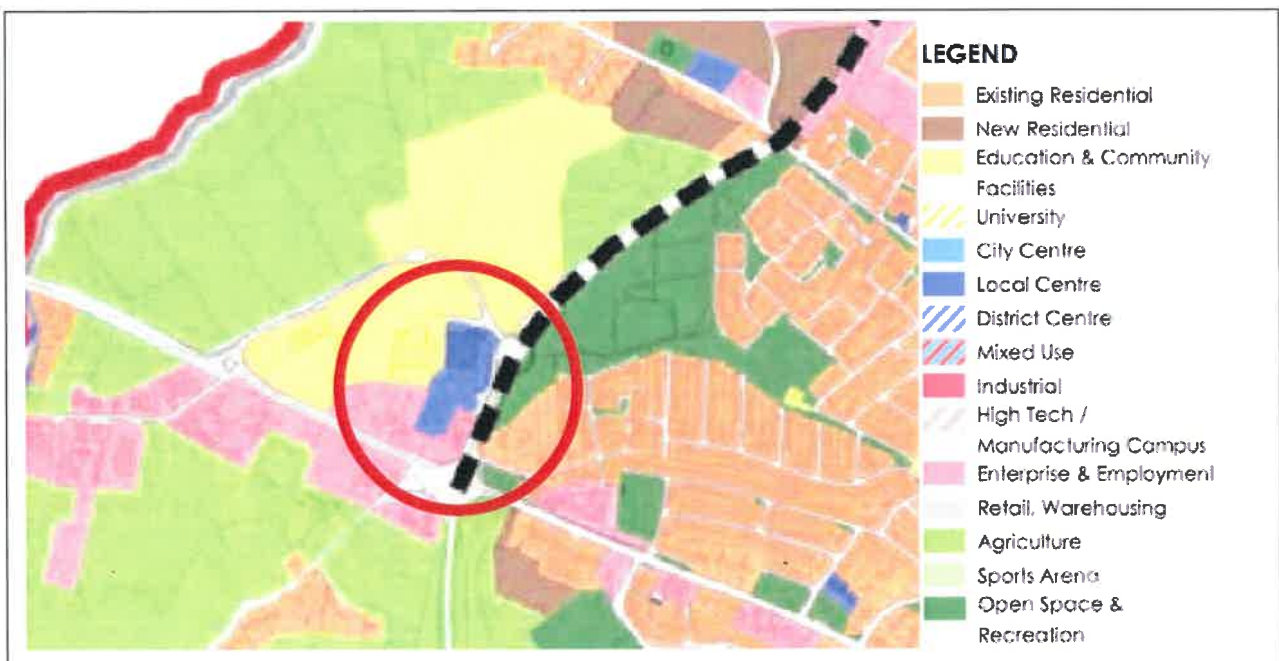


Figure 1 – Draft Land Use Zoning for Coonagh Cross Shopping Centre



In this instance, Tesco fully supports the designation of Coonagh Cross Shopping Centre as a 'District Centre' as referred to within the Draft Plan text, and would request that the Land Use Zoning Map is amended to reflect same. It is considered the Centre is well placed to support policy objectives of ECON 03 particularly through the protection and enhancement of the mix of services and facilities in this existing District Centre which provide for the day-to-day needs of local communities in accordance with the Draft Retail Strategy.

#### **4.1 Supporting Existing Retailers**

The importance of supporting existing retail operators in Limerick City and throughout the County must be considered as part of the new Development Plan. 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 to ensure the commercial viability of retail premises. A failure to accommodate deliveries could have a detrimental impact on such premises.

In this regard, we respectfully request that no policies are introduced that could lead to any restrictions on deliveries as part of the new Development Plan and that the Local Authority engage with retail operators as part of any future public realm or transportation strategies. Furthermore, we would request that the delivery requirements of convenience food store operators are acknowledged and that policies providing for deliveries, including early morning deliveries, should be encouraged. Such an approach will promote retail development in the County and will ensure that stores can offer their customers a high quality product.

## 5. Requirements of Retailers

Retailing and convenience retailing in particular have 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 Limerick'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 buildings 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 such 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 option.<sup>4</sup> Furthermore, as outlined previously in this submission, the delivery process typically undertaken by large convenience retailers involves large goods vehicles which are generally not 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 highest 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>4</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 new Development Plan. These factors include, *inter alia*:

- 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 new Development Plan to ensure 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 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 area often required to ensure the efficient operation of a modern supermarket is outlined in Table 1. 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"> <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 access limited 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 often provided complete with ovens, storage and manufacturing area in compliance with various Environmental Health requirements.</li> </ul>

In addition, it is also worth highlighting the changing nature of retailing in general with movement towards more online shopping. This change has been accelerated in recent months, with more people choosing online shopping and delivery solutions. Convenience retail operators have experienced a significant increase in online sales over the last 12 months with Tesco anticipating further growth in this area.

As referred to, the design of modern retail formats is dictated by retailers' requirements, current Building Regulations, Fire Safety and Disability Access requirements. Each of these regulations necessitates additional space requirements (circulation space, staff facilities, service yard/layout requirements etc.) which traditionally would not have been required in similar type retail stores. Having regard to these matters, it is requested that the policies in the new Development Plan for the County and City fully recognise these detailed requirements.

## 6. Click and Collect and Grocery Home Shopping

As referred to within this Submission, the nature of retailing in general is changing, with movement towards more online shopping. While convenience shopping continues to be focused on in-person shopping due to the nature of the service being provided, it is noted that the role of 'Click and Collect' and home deliveries has increased.

Having regard to this, it is worth highlighting the important role of Click and Collect facilities. Such facilities offer an extremely efficient and important service, which allows customers to collect their shopping at a time that suits them and without the requirement to enter the store.

Click and Collect facilities have a relatively small spatial requirement, are usually located within dedicated areas of the customer car park, and typically in the most easily accessible locations e.g., adjacent to mobility impaired and parent and toddler spaces. Click and Collect is a highly efficient service providing grocery/convenience offering to all persons, reducing both 'downtime' for customer journeys and the overall requirement for car parking, resulting in more efficient use of land.

Tesco's Grocery Home Shopping service is a rapidly growing area of the business and the largest such infrastructure in Ireland, experiencing a high level of demand and take up. Unlike most online retail, Tesco's online service is supported by local colleagues to service the fulfilment, which is picked in store, and then delivered by its team of drivers. The online grocery retail model also provides a platform for Tesco's Irish supply base which is in excess of 490 Irish food and drink suppliers.

Click and Collect convenience shopping, in addition to Grocery Home Shopping, provides an important retail service. We therefore respectfully request that the new Development Plan has due regard to the recent growth of both Click and Collect and Grocery Home Shopping services and to provide support for same in the new Plan. Having regard to the above, Tesco would welcome the addition of the below policy in the finalised Development Plan:

***"To support and accommodate the growth of 'Click and Collect' retail services and grocery home shopping."***

## 7. Conclusion

Tesco welcomes the ongoing review of the Limerick Development Plan and the opportunity to comment on the published Draft Development Plan. Tesco, as a primary convenience retailer in the County, is committed to meeting the needs of its customers and positively contributing to the physical and social environment of the County's primary settlements.

As the County's population continues to increase over the next decade, it is important that the Local Authority supports existing retailers and provides for additional retail convenience floorspace at appropriate locations that serve the needs of current and future residents. In this regard, it is respectfully requested that as part of the Limerick Development Plan 2022-2028, the Council:

1. Provides flexible land use zoning objectives that will allow sites to be brought forward in the County's towns and settlements for convenience retail development over the lifetime of the Plan.
2. Amend the Land Use Zoning map for the 'District Centre' at Coonagh Cross Shopping Centre in order that Policy ECON 03 of Draft Development Plan text and the associated zoning objective are fully aligned.
3. 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 that have been identified in the Plan.
4. Acknowledges the requirements of modern retailers including appropriate floorplates, car parking and servicing access, where possible, and the Limerick Development Plan and associated Retail Strategy should include reference to these requirements.
5. Supports and accommodates the growth of 'Click and Collect' retail services and Grocery Home Shopping.

We trust that the matters outlined within this Submission will be taken into consideration as part of the preparation of the Limerick 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.

# Contact Details

## Enquiries

[Redacted contact information]

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