



Pre-Draft Public Consultation-Kilkenny County Development Plan 2020-2026

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Kilkenny County Council, County Hall, John Street,
Kilkenny.**

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For and on behalf of GVA Planning and Regeneration Limited

1. Introduction

This submission has been prepared by GVA on behalf of Tesco Ireland Limited, Gresham House, Marine Road, Dun Laoghaire, Co. Dublin, in response to the publication of the Pre-Draft Issues Paper of the Kilkenny County Development Plan 2020-2026 (hereafter "*Issues Paper*"). Tesco, being a recognised part of the retail environment in the region and having stores located across the Country, welcomes the opportunity to make a submission on the preparation of the Draft Kilkenny County Development Plan 2020-2026 (hereafter "*Draft Plan*").

The retail sector makes a major contribution to the vitality and viability of settlements in counties by acting as an economic and social anchor for an area. In this regard, we would encourage the Local Authority to engage with stakeholders in the retail sector to ensure that there are appropriate policies in the Draft Plan to attract new operators to the County.

We would like to take this opportunity to identify the importance of convenience retail facilities in Kilkenny City and County, as well as highlighting the difficulties that can be faced in operating and locating such stores. On this basis our Client would, therefore, request that Kilkenny County Council include policies in the Draft Plan that would promote the development of retail stores at suitable locations, in accordance with the requirements of the Retail Planning Guidelines, April 2012.

2. Background

As noted above, Tesco Ireland is one of the main retailers in the country and has locations in nearly all of the main cities and towns in Ireland. Despite this, Tesco has no store in Kilkenny City despite this settlement having a significant population and being an important settlement in the south-east region.

Tesco Ireland have been interested in locating in Kilkenny for a number of years and there have been numerous consultations, meetings and discussions with the local authorities, either Kilkenny County Council or the Kilkenny Borough Council which was previously responsible for the spatial development of the City area. These meetings sought to identify a site in or around the centre of Kilkenny City which would be appropriate for developing a Tesco store. These consultations have included providing extensive advice on regeneration of sites, as well as actively engaging with public/stakeholder consultation processes with both the County and the Borough Council. To date this engagement has not led to the delivery of a Tesco store in the City despite our Client's best efforts. Given the recent publication of Ireland 2040: National Planning Framework and the impending publication of the Draft Regional Spatial and Economic Strategy for the region, it is suggested that it will be necessary for Kilkenny City to provide for an increased population as well as, all of the ancillary services such as water infrastructure, public transport and retail facilities. As such, it is important that the Draft Plan identifies an appropriate strategy for the development of urban areas including the provision and allocation of retail floorspace in or around designated centres. This is particularly important for the development of Kilkenny City being the largest settlement in the County and as such, it will be necessary to manage the expansion of the City as a driver for the County and the region.

3. Retail Policies

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/settlement¹. It is also highlighted in this document 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, April 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 i.e. Dublin City or that the allocation of retail floorspace to a settlement or a county needs to be reviewed so as to reduce the leakage.

Kilkenny City and its hinterland is an important part of the urban structure of the wider County and plays a key role in providing services for a significant proportion of the County's population. The history, status and scale of the City means that it is the primary urban settlement in the County, with the nearest significant settlements being Carlow to the north c. 37 km away, Thurles to the west c. 44 km away and New Ross c. 48 km to the south. This results in the City serving a large rural catchment and places an increased service requirement on this historic City.

In this case, it is important that adequate facilities are provided for in Kilkenny to restrict the possibility of retail leakage from the County. This can be achieved by ensuring that the primary centre for the County, being Kilkenny City, has the necessary facilities to not only serve the existing population but also any future growth that may occur in the settlement. In this regard, it is noted that Kilkenny has 8 no. convenience retail stores in the CSO boundary for Kilkenny City as indicated on Fig. 1. In order to consider if this level of retailing is sufficient to serve the population of the City, a comparison between Kilkenny and other settlements such as Athlone, Co. Westmeath, Ashbourne, Co. Meath, Killarney, Co. Kerry and Mullingar, Co. Westmeath has been undertaken and is outlined on the following page.

¹ Planning and Development Act 2000, as amended, Section (10)(2A)(e)

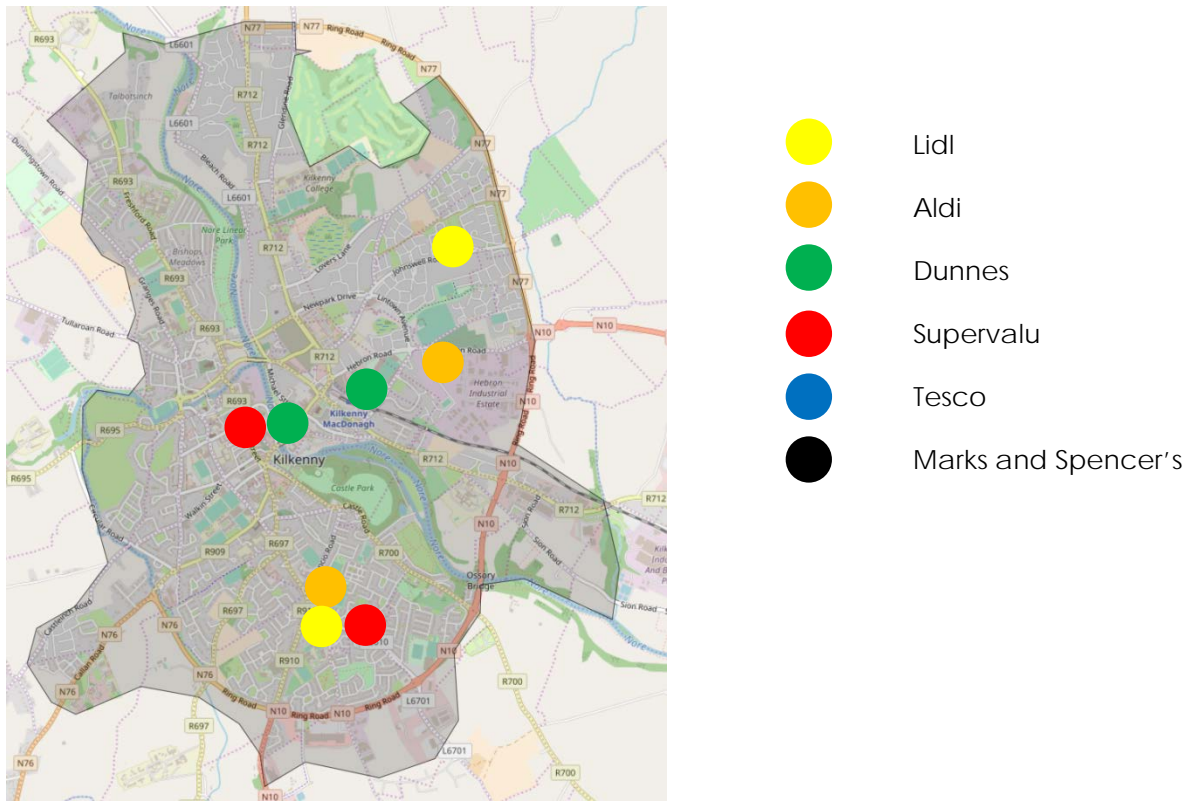


Fig. 1: Kilkenny CSO Boundary with existing retail facilities highlighted.

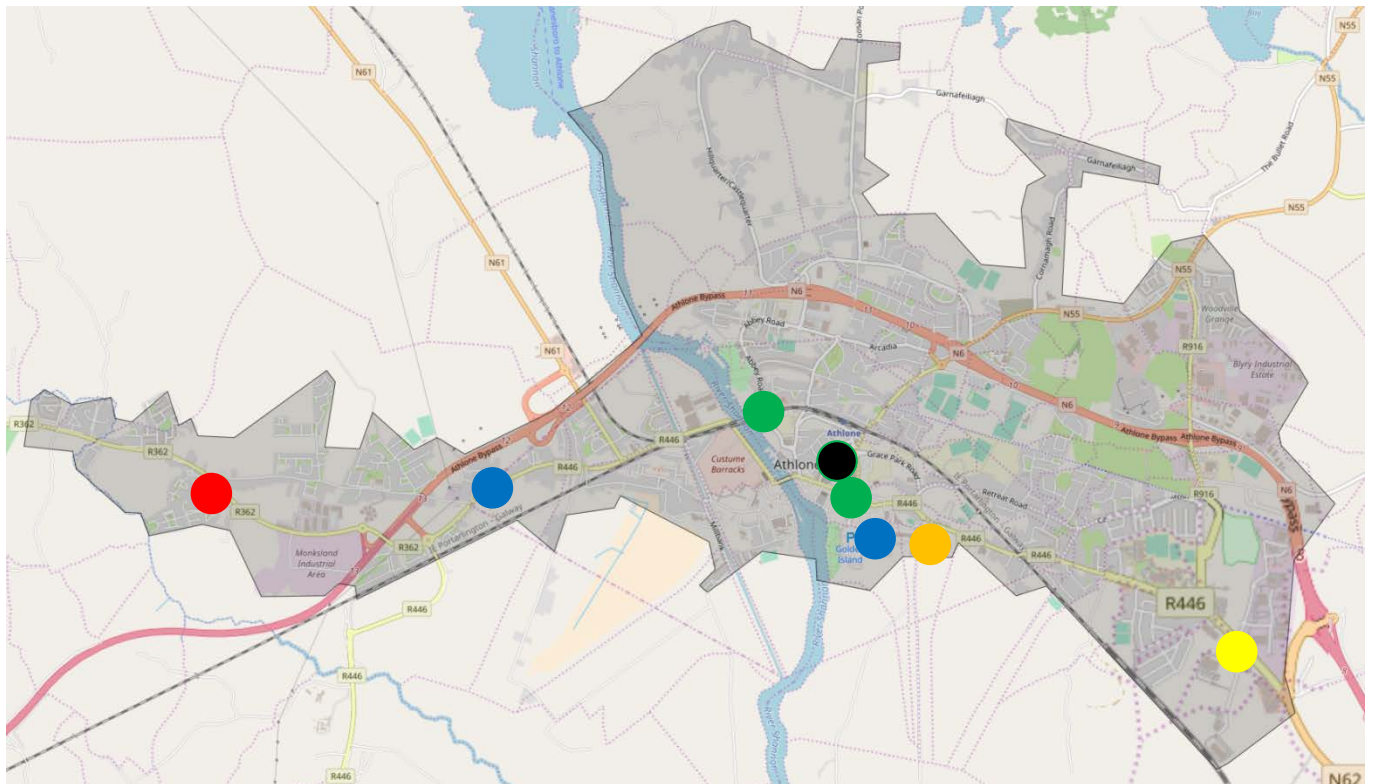


Fig. 2: Athlone CSO Boundary with existing retail facilities highlighted.

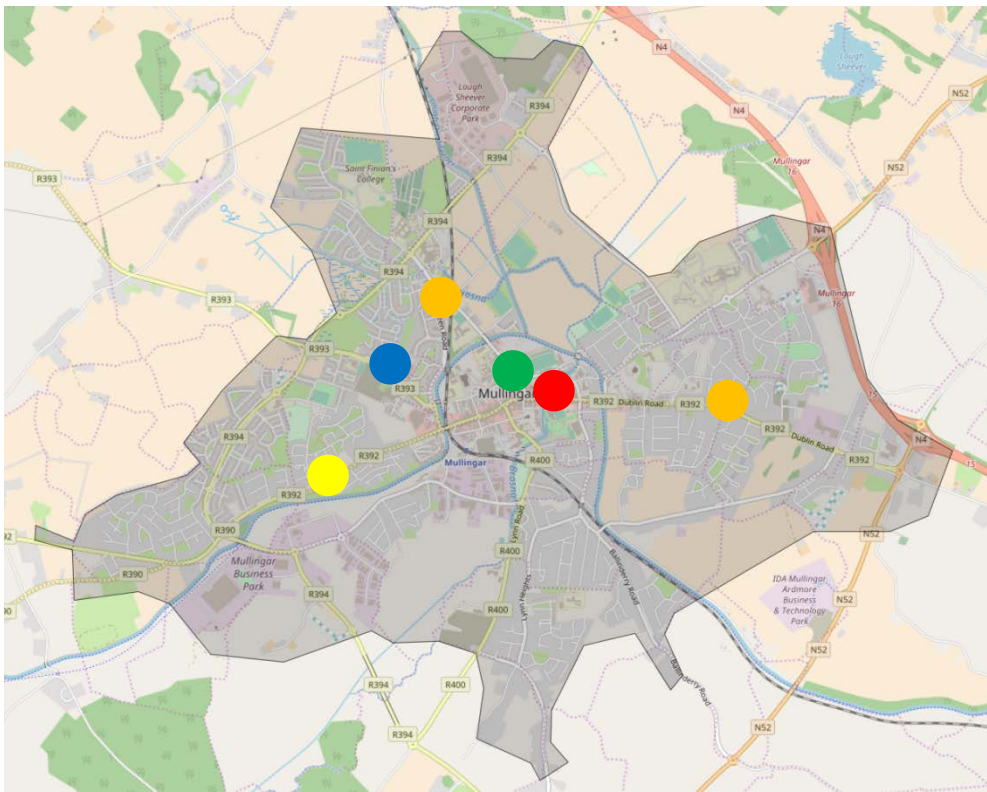


Fig. 3: Mullingar CSO Boundary with existing retail facilities highlighted.

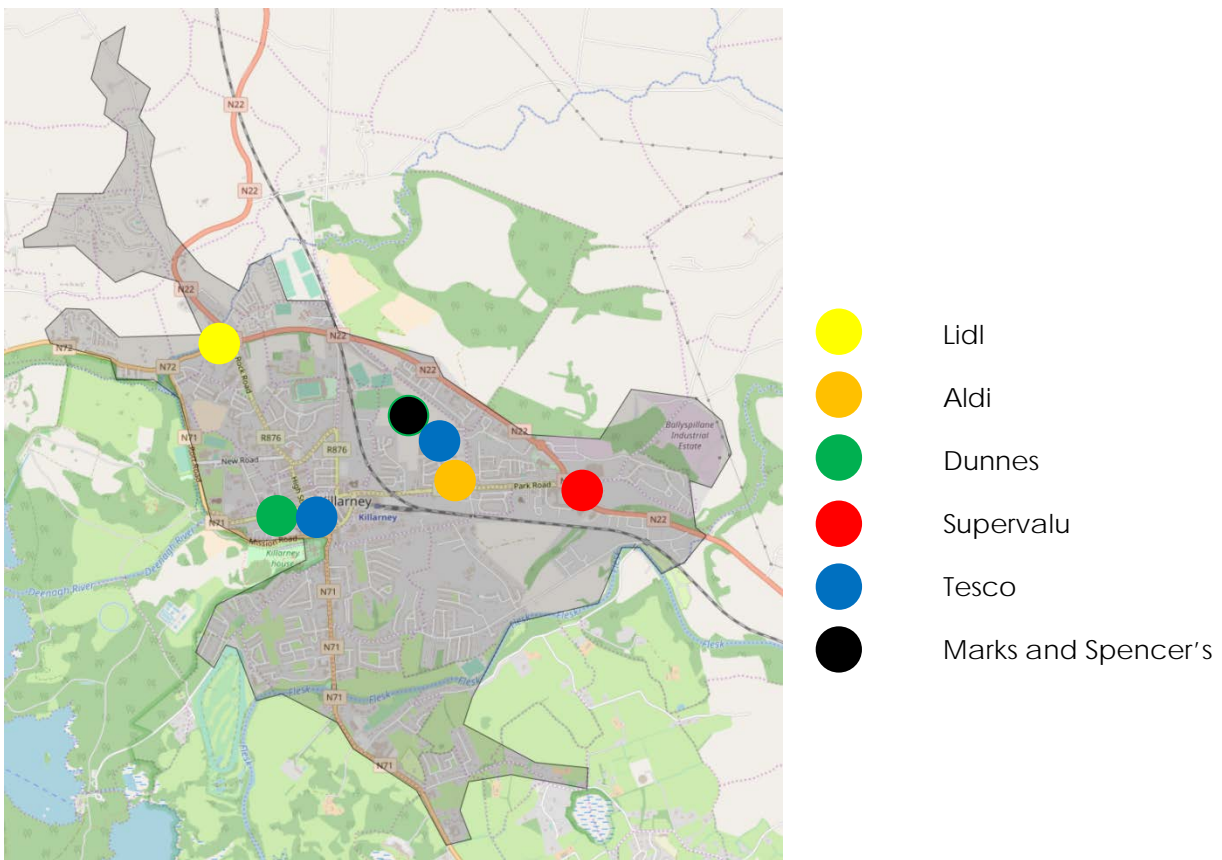


Fig. 4: Killarney CSO Boundary with existing retail facilities highlighted.

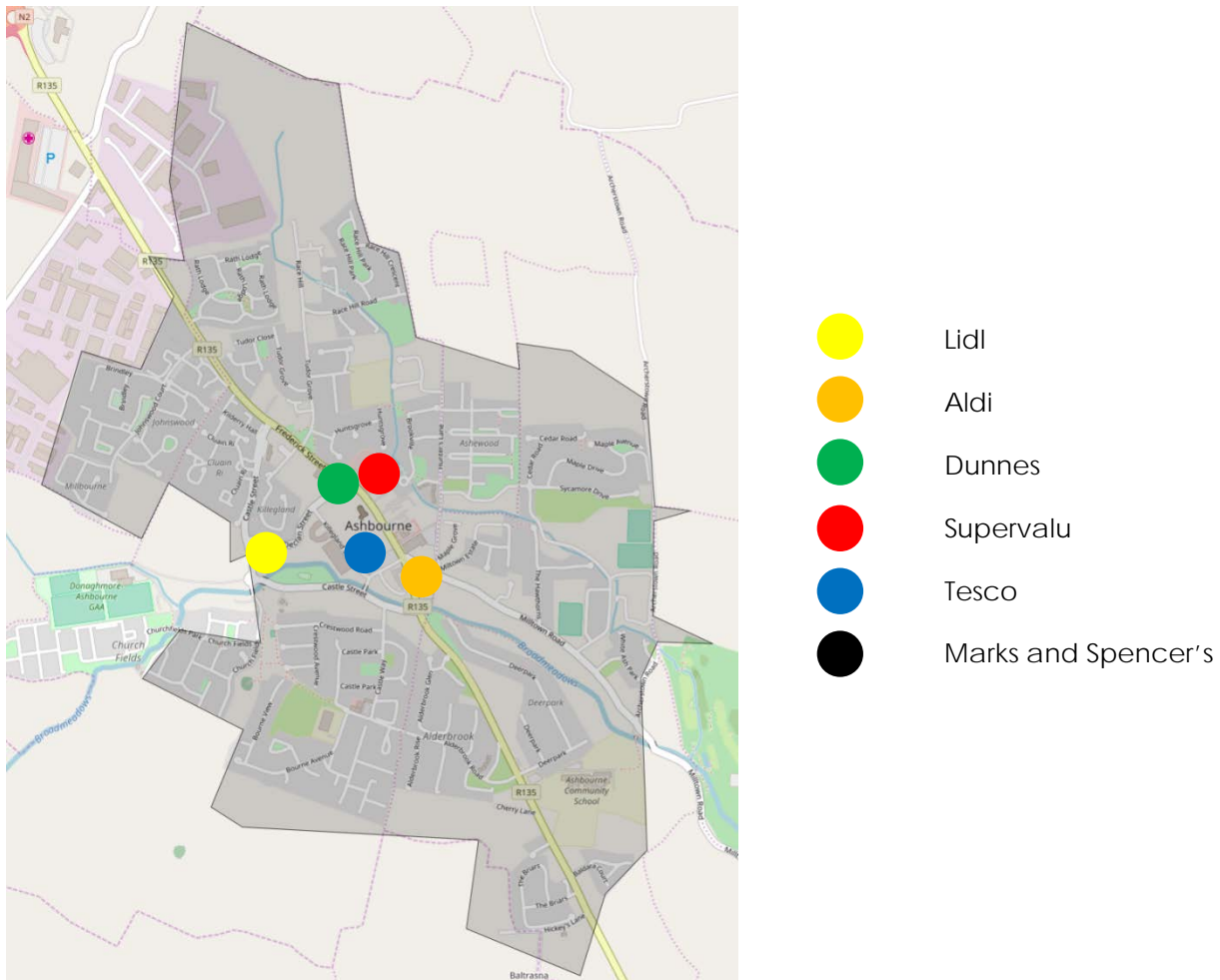


Fig. 5: Ashbourne CSO Boundary with existing retail facilities highlighted.

Settlement	Population (2016 Census)	No. of stores	Retailers represented
Kilkenny	26,512	8	SuperValu, Aldi, Dunnes, Lidl.
Athlone	21,349	9	Tesco, Aldi, Lidl, Marks and Spencer's, SuperValu, Dunnes Stores.
Mullingar	20,938	8	Tesco, Aldi, Lidl, SuperValu, Dunnes.
Killarney	14,504	9	Tesco, Aldi, Lidl, Marks and Spencer's, SuperValu, Dunnes.
Ashbourne	12,679	5	Tesco, Aldi, Lidl, Dunnes, SuperValu.

Table 1: Comparison of different settlements

As outlined in the images and the table above Kilkenny is the largest settlement of all of those considered, with a population of 26,512 no. people. Despite this Kilkenny city has fewer retail convenience stores than smaller

settlements such as Athlone and Killarney, whilst it has the same number of stores as Mullingar which has a population that is c. 20% smaller than Kilkenny City. It is also notable that there is lack of competition in the Kilkenny convenience retail market. When Kilkenny is compared to all of the other smaller settlements, it is noticeable that Kilkenny is the only one which doesn't have a store operated by all of the five largest national convenience retailers (Supervalu, Tesco Dunnes, Lidl and Aldi). This is particularly noticeable when compared to Ashbourne, Co. Meath as this location has less than half of the population of Kilkenny but has stores operated by all of five of the largest national retailers.

The above, therefore, indicates that there is a lack of retail facilities in Kilkenny compared to other settlements and that there is also lack of competition. As it is intended that the population of Kilkenny will grow over the coming years it is important that this matter is considered as an increased population will expect greater competition as well as an adequate quantum of retail locations. Based on the above analysis it appears that this is not currently provided for and could impact on the expansion of the City and the County.

In this regard, it should once again be noted that Tesco Ireland has been trying to locate in Kilkenny for some time but have been prevented by a lack of adequate sites. Should an appropriate site be available and the development of a convenience store is consistent with the Development Plan, then Tesco Ireland would be interested in locating in Kilkenny City. However, this will be dependent on the Draft Plan acknowledging the need for additional retail convenience facilities in Kilkenny City, providing appropriate zonings for same and providing policies that will be consistent with the needs of retailers. All of these matters and how this can be achieved, are addressed in the subsequent sections of this submission.

4. Retailing in Kilkenny

As noted above, it appears that, there is a lack of retail convenience facilities in Kilkenny City and it is important that this is addressed in the context of providing for an expanding population. This lack of retail facilities is not just evident from the analysis above but is also highlighted in the current Kilkenny County Development Plan 2014-2020. It is noted that the level of convenience expenditure leakage from the County is “*significant*”, with the level of leakage in some urban areas being above 10%². With the combination of an increasing population creating further demand for convenience retail floorspace, as well as the existing level of retail leakage and the apparent lack of competition in Kilkenny City, it is submitted that there is a requirement for additional land to be zoned for convenience retail use.

The Kilkenny County Development Plan 2014-2020 noted that there is limited floorspace available for retailing in Kilkenny City Centre³. This is a matter of concern as it is submitted that the development of Kilkenny City is not only important for the growth of the County but also for the development of the region. The current allocation of retail floorspace in the County provides for some development in the City area, however, a significant proportion of the retail floorspace for the County has been allocated to Ferrybank. Ferrybank, is located on the border of Waterford City and seeks to be an extension of Waterford City. The allocation of retail floorspace to a settlement that is reliant on a neighbouring authority could be detrimental to Kilkenny City, as the population growth and expenditure that may occur in Ferrybank could be focused in Kilkenny City instead. This would allow for the City to consolidate and grow thus ensuring that the City is in a position to compete with other Irish and European cities for employment, funding, etc.

In this regard it is submitted that the Draft Plan is prepared with the intention of focusing on the growth of Kilkenny City including providing an improved convenience retail environment that will improve the number of facilities in the City, as well as providing improved competition for the market.

This can be achieved in a number of ways but it is important that appropriate locations are designated for the provision of additional convenience facilities. Different approaches that could be adopted would include;

- Allocating sites in or around the City Centre or;
- Through the use of flexible zonings which will have convenience retail facilities open for consideration, provided that they can comply with the sequential test that is outlined in the Retail Planning Guidelines, April 2012.

Flexible land use zonings, which permit a variety of uses, will ensure that convenience retail floorspace can be developed at suitable locations, such as in or around the City Centre as well as new/existing residential areas that require additional retail services. By providing for the development of convenience retail floorspace in this manner it will help stem the leakage of retail expenditure into neighbouring counties. As the population of Kilkenny County continues to grow, particularly in urban centres such as Kilkenny City, additional convenience floorspace will be required as pressure mounts on existing centres/locations. A failure to acknowledge this future need and adopt solutions such as flexible land use zonings could further hinder the future development of convenience retail floorspace in Kilkenny City. This could ultimately make the location less attractive to prospective employers or potential residents.

² Kilkenny County Development Plan 2014-2020, Appendix A: Retail Strategy, page 20.

³ Kilkenny County Development Plan 2014-2020, page 49.

It is requested that the Local Authority consider the above and identify appropriate sites in or around the City Centre as well as providing flexible zonings on sequentially appropriate sites. This will ensure that the Draft Plan provides the opportunity for additional competition in the Kilkenny City retail convenience market provide for an improved urban environment and reduce the likelihood of retail leakage from the County.

5. Requirements of Retailers

The approach outlined above would also be consistent with the requirements of retailers when considering sites that may be suitable. 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 Kilkenny City Centre is made up primarily 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 the City Centre, 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 as outlined above 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 option⁴. 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 city 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 has to comply with the requirements of planning legislation/guidance and those of a Local Authority, it is also important that the needs of the customer are facilitated. Meeting the requirements of the customers includes providing a site layout/design that is efficient and welcoming. To ensure the best quality products are available, 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 in reviewing the designated centres that will be included in the County Development Plan. These factors include:

- Quality of the public realm;
- Retail layout achievable;
- Traffic management & movement strategy;
- Servicing / deliveries & accessibility;

⁴ Guidelines for Planning Authorities: Retail Planning, April 2012, Section 4.11.1, pg. 35.

- Height /mix of uses;
- Car parking;
- Health and safety; and,
- Planning policy restrictions.

In order to attract retailers, the Draft Plan must acknowledge that modern stores are designed to be efficient, spacious and provide a pleasant environment for both employees 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 has to 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 within 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 off loading 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 and direct 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

Table 2: Needs of a modern retail convenience store

Having regard to the above, it is requested that the policies in the Draft Plan must 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 units should be included in the Draft Plan. Such policies would be particularly relevant in the Kilkenny City area 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 that retail leakage into neighbouring counties is reduced as well as making the City more attractive to prospective employers and residents.

6. Conclusion

Our Client welcomes the publication of the Issues Paper as well as the opportunity to comment on the preparation of the Draft Plan. As noted above Tesco have engaged with the local authorities in Kilkenny for a number of years with the view to locating a store in the City. This has not come to fruition over the last number of years however, as part of this plan making process there is the opportunity and need for the Local Authority to provide for additional retail capacity/competition. We trust that the matters outlined above will be taken into consideration as part of the Draft Kilkenny County Development Plan 2020-2026. In conclusion this submission seeks the following;

1. That adequate convenience retail floorspace be allocated to Kilkenny City and that appropriate lands be zoned for such a development. It is also submitted that more flexible zoning should be provided to allow for sites to come forward over the life of the proposed Plan. This would be an appropriate solution provided the sites are consistent with the sequential test outlined in the Retail Planning Guidelines, April 2012.
2. That these zonings be considerate of the site requirements of retailers and ensure that a modern convenience store can be developed on such sites. As outlined above this includes ensuring that sufficient car parking and servicing access can be provided to the site.
3. That policy is provided to facilitate the delivery of a modern retail convenience unit including the provision of a modern back of house solution that will allow for a high quality store which will improve the attractiveness of the City.

We are available for discussion on any of the matters referred to above and we would also appreciate if you could confirm receipt of this submission by return.

Yours sincerely,



Simon Bradshaw
Principal Planner
For and on behalf of GVA Planning