



Draft Cork City Development Plan 2022-2028

A Submission on behalf of Tesco Ireland Limited

October 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 Cork City 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 Cork City, 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. Having regard to this, we welcome this opportunity to engage with the Local Authority in respect of the preparation of a new Development Plan for Cork City. We 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 both new investment to Cork City and also protect the viability and vitality of retail premises within towns and villages.

We take this opportunity to highlight the importance of convenience retail facilities throughout Cork City, their contribution to Town Centre regeneration and the requirements to locate and operate such stores. On this basis, we respectfully request that, following this submission, Cork City Council provides policies that support existing retail stores and promote the development of new retail stores of an appropriate scale, at suitable locations across Cork City, in accordance with their respective projected population growth.

2. Background

As stated previously, Tesco is one of the primary convenience retailers in Ireland and operates 151 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 7 no. stores in Cork City and given the projected population growth for Cork City it is considered that there is scope to provide additional stores at appropriate locations to serve the City'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 City.

The Draft Development Plan projects a significant increase in population of 260,194 persons, an increase of 24% for the City during the Development Plan period. The City suburbs are projected to have the highest increase of 160,289 persons during the Plan period.¹ The proposed population figures for the City align with the National Planning Framework (hereafter 'NPF'), the Regional Spatial and Economic Strategy for the Southern Region (hereafter 'RSES') and the Cork Metropolitan Area Strategic Plan (hereafter 'MASP') population targets.

Taking this into consideration, it is important that the new Development Plan for Cork City 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 the support for 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 policies to ensure that these facilities can continue to provide for the needs of expanding catchment areas.

¹ Cork City Council, 'Draft Cork City Development Plan 2022-2028', pg. 49

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. It is also set out within the Act 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, 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. In addition, it is considered that there is potential for additional convenience retail in some of the settlements in Cork City, given their projected population growth over the lifetime of the Plan.

3.1 Strategic Narrative

The Draft Development Plan projects a significant increase in population of 260,194 persons, an increase of 24% for the City during the Development Plan period. The projected population growth demonstrates that Cork City will continue to grow at a rapid rate. Such increases in the City's future population also bring with them an increased demand for associated services including housing, education, community and retail. The new Development Plan, as well as future City Development Plans, must ensure that the policies and objectives in place are sufficiently strategic and robust in nature in order to appropriately accommodate an increasing population and to provide for the increasing demand for services.

Tesco occupies an established position within the retail sector as one of the Ireland's leading convenience retailers. 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 City that could serve the ongoing rise in population both over the lifetime of the new Development Plan and beyond.

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

Tesco considers that a range of formats 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 while also providing grocery home shopping hubs and Click and Collect facilities. Larger store formats can provide customers with the opportunity to avail of a range of shopping channels while also promoting sustainable modes of transport through 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 nationwide store network 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 Cork City 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 City 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. Appropriate Zoning Objectives & Retail Policies

Given the projected population increase of Cork City 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 Development Plan. 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.

4.1 Additional Retail Development in North Cork City

Tesco would like to take this opportunity to express their support for the additional retail development as proposed within the Draft Development Plan. Cork City Council's stance, which firmly promotes additional retail development in the City, will prove to be hugely beneficial in the medium to long term, in supplying settlements that are currently experiencing rapid population growth, and those with future predicated population growth, with much needed retail services.

As illustrated by Figure 4-1, Tesco is well represented in the southern part of the city with 7 no. stores situated south of the Lee in Cork City Centre, Wilton, Douglas, Mahon and Ballincollig. With regards to facilitating new retail development, we would respectfully request that potential development sites are suitably zoned, specifically in the North City, to accommodate new retail stores of an appropriate size. We would also request that consideration is given to allow for the provision of Grocery Home Shopping operations at these sites and that the sites are not constrained in terms of spatial or access requirements.

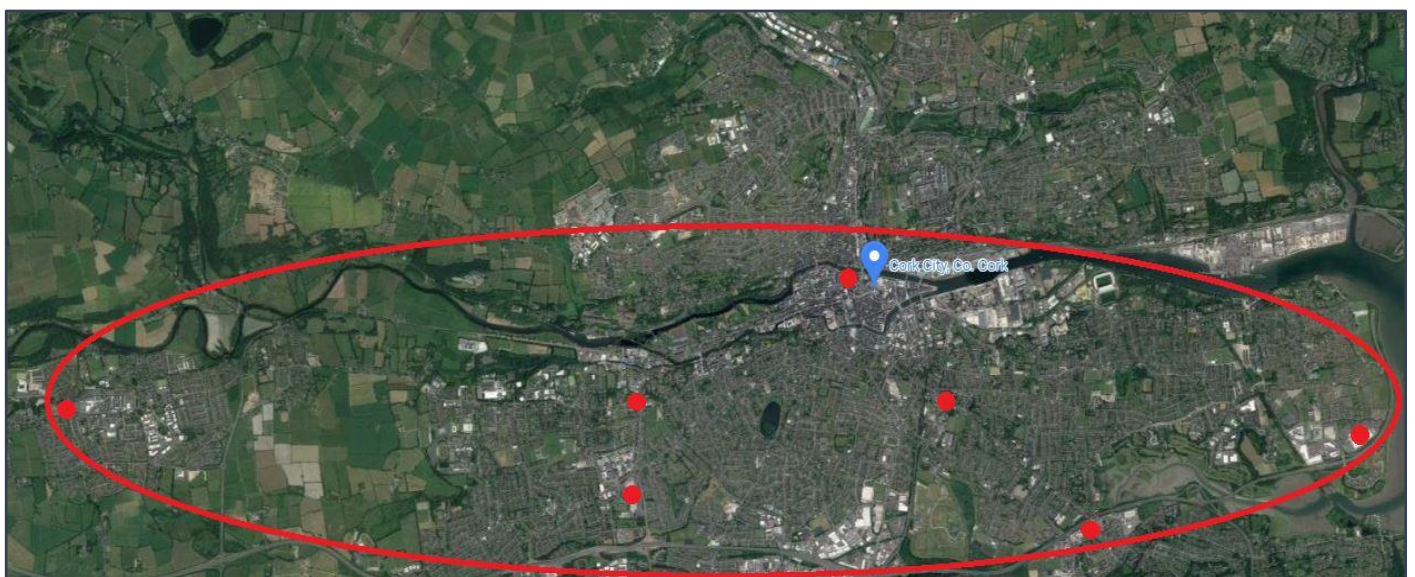


Figure 4-1: Existing Tesco Store Locations in Cork City

In respect of facilitating new retail development, it is important that when sites are not available in the retail core areas, due consideration is given to edge of centre sites, as the City / town centre cannot always accommodate 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 City / 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. Taking cognisance of same, we request that the Local Authority adopts a flexible approach to allow for the development necessary to provide important local services and amenities for the growing population across settlements in Cork City.

4.2 Supporting Existing Retailers

The importance of supporting existing retail operators in the City must be considered as part of the new City 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.

Having regard to this, 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 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. An approach such as this will promote retail development in the City and 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. Having regard to this, it is noted that, characteristically, town centre areas are comprised of historic buildings, many of which often consist of irregular floor layouts or are subject to changes in floor levels. Generally, modern larger retail convenience layouts require unobstructed and level floorplates. Where sites with these characteristics become available in or around town centre areas, it is important that the Local Authority recognise these sites as being 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 a feasible option.² 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.

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 for the City. These factors include, *inter alia*:

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

- 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 take cognisance of 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 below. For example, while it is not strictly required to have an enclosed cage marshalling area within the footprint of a building, it is often enclosed when adjacent to residential areas to ensure that there is little visual, or noise impact associated with the movement of roll cages within the service yard.

Table 1: Needs of a Modern Retail Convenience Store

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

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 City fully recognise these detailed requirements.

6. Click and Collect and Grocery Home Shopping

As referred in 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, 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 the largest such infrastructure in Ireland, experiencing a high level of demand. Unlike most online retail, Tesco's GHS service is supported by local employees 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 adopted Development Plan:

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

7. Conclusion

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

As the City'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. Having regard to this, it is respectfully requested that as part of the Cork City's Development Plan 2022-2028, the Council undertakes the following:

1. Provide flexible land use zoning objectives that will allow sites to be brought forward in the City's towns and settlements for convenience retail development over the lifetime of the Plan.
2. Provide for flexible zoning objectives at appropriate sites for development in the North City.
3. Include 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 City that have been identified in the Plan.
4. Acknowledge the requirements of modern retailers including appropriate floorplates, car parking and servicing access, where possible, and in the Cork City Development Plan.
5. Support and accommodate 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 finalisation of the Cork City 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

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