



GVA Planning

2 – 4 Merrion Row
Dublin 2
D02 WP23

T: +353 (0)1 661 8500

gva.ie

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Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin,
D09 C8P5.

Dear Sir/Madam,

Submission on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region

This submission has been prepared by GVA, 4th Floor, 2-4 Merrion Row, Dublin 2 on behalf of our Client, Tesco Ireland Limited, Gresham House, Marine Road, Dun Laoghaire, Co. Dublin. Tesco Ireland generally welcomes the publication of the Draft Regional Spatial and Economic Strategy (hereafter referred to as the Draft RSES) by the Eastern and Midland Regional Assembly (EMRA), and the opportunity to provide comment on same.

The Draft RSES is a strategic plan which identifies regional assets, opportunities/pressures and provides appropriate policy responses in the form of Regional Policy Objectives. The RSES, once finalised, will replace the current Regional Planning Guidelines for the Greater Dublin Area (GDA), the Border region and the Midland region. It is submitted that retailing, in general, is an important source of direct employment in the Region, where significant numbers of people are employed in the industry. In this regard, retailing is a key strength (both in terms of investment and employment) for the Region. Tesco Ireland has retail operations in every county in the Eastern and Midland Region and, as such, is a key retail employer that forms a large part of the retail environment in the Region.

Tesco Ireland therefore welcomes the opportunity to provide comments on the publication of the Draft RSES. It is submitted that:

- Prioritisation must be given to the preparation of a new Retail Strategy for the region, as the previous Retail Strategy for the GDA is over 10 years old.
- It is important that an appropriate level of flexibility is incorporated into the RSES in terms of the designation of settlements, allocation of growth and the designation of hierarchies, in order to respond to potential changes in the economic environment which may impact upon retailers.
- The requirements of retailers must be taken into consideration in terms of the location of commercial uses, inconsistent car parking standards as well as matters such as deliveries and distribution not being adequately considered.

GVA Planning is the trading name of GVA Planning and Regeneration Limited registered in the Republic of Ireland number 409687. Registered office, 2-4 Merrion Row, Dublin 2, D02 WP23. Directors of the Company: Robert McLoughlin, Gerard Hughes (British), Simon Miller (British), Stephen Brown (British), Paul Holcombe (British).

Grounds of Submission

Requirement of a Retail Strategy for the Region

The Draft RSES recognises the vital role that retailing plays in the Region. It recognises that retailing enables the provision of strong mixed-use commercial cores throughout the Region and can play a key role in the regeneration of areas. Despite this, a Retail Strategy has not formed part of the Draft RSES. The Retail Strategy for the Greater Dublin Area (2008) was prepared by the Dublin and the Mid-East Regional Authorities (now since dissolved and replaced by the EMRA). This Retail Strategy is more than 10 years old and as a result is out-of-date. The economic climate of the country has significantly changed during the course of the Strategy's lifetime and, as such, an updated Retail Strategy for the Region must be a priority under the RSES.

The Draft RSES recognises that the floorspace thresholds detailed in the GDA strategy were prepared in a different economic climate and in many cases are still to be reached. In this regard, it is stated that the EMRA will support the preparation of a new Retail Strategy for the Region and update the hierarchy for the Region including outlining floorspace requirements. Tesco Ireland would request that the update of the Retail Strategy is a priority of the EMRA and that the population figures outlined in the National Planning Framework should be considered when preparing this strategy. It is imperative that an updated retail hierarchy and floorspace requirements are provided as a matter of urgency, as such details are important to retailers. Additionally, a Retail Strategy should be provided for the whole EMRA area and not simply the GDA area.

The Draft RSES has two Regional Policy Objectives in relation to Retail Strategies and Retail Planning Guidelines. These are detailed in Table 1 below, with a submission response also detailed.

Regional Policy Objectives: Retail Strategies and Retail Planning Guidelines¹	Comment
RPO 6.9: <i>EMRA will support the preparation of a Retail Strategy/Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2012 to update the retail hierarchy and apply floorspace requirements for the Region.</i>	Tesco Ireland supports the full implementation of these objectives, but it is submitted that the preparation of a retail strategy/strategies for the Region is made a priority for the EMRA. The last retail strategy for the region was published in 2008 and is therefore considerably dated. It is vital to the future development of the region that an updated strategy is provided to retailers who may be developing stores in this commercially important region.
RPO 6.10: <i>Future provisions of significant retail development within the Region shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012 and the retail hierarchy for the Region, expressed in the RSES, until such time as this hierarchy is updated.</i>	

Table 1: Regional Policy Objectives and Submission Comments.

Settlement Structure

Additionally, it is submitted that the requirements of retailers are considered as part of both the RSES and the future Retail Strategy. The proposed RSES will cover a significant timeline, which may include changes in the national or regional economic environment, such as increased growth or an economic downturn. Such variations in the pattern of economic activity have previously resulted in the development of settlements that have not aligned with their hierarchical role. An example of this is the growth of Co. Laois and particularly Portlaoise Town. The growth of this town and the wider county was far greater than that predicted in the Midlands Regional Planning Guidelines 2010-2022.

As such, there is a need for greater flexibility in the Regional Strategy regarding the designation of settlements and the allocation for growth. The changing role of settlements is particularly important when considering the types of economic activity that is planned for the region. The importance of retailing and particularly convenience retailing is vital to the function of a number of settlements in

¹ EMRA Draft Regional Spatial & Economic Strategy, page 98.

the region. In this regard, the ability of convenience retailers to contribute to economic growth both directly and indirectly should be recognised.

Needs of Retailers

As part of the Draft RSES and the future retail strategy, the matters associated with retail operations should also be considered. As the NPF has moved towards increasing densities, it is likely that there will be a greater proportion of the population living in urban areas. As such, consideration must be given to any potential barriers to retail investment in the Regions urban areas, such as overly restrictive car parking standards, inflexible zoning matrices, floorspace caps and inappropriate zoning designations. These barriers can be responsible for the movement of retail investment from one jurisdiction to another.

Furthermore, other matters need to be taken into account when considering where to designate retail development. It is important to ensure that retailers can locate and operate efficiently at appropriate urban sites. As noted above, restrictions on sites can lead to them not being viable and these can come in the form of overly restrictive policies or conditions attached to planning permissions. In this regard, it is important for a convenience retailer to undertake deliveries and other operational requirements at certain times so as to ensure that the store operates in a sustainable and efficient manner.

For example, 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 such a system is an exemplar in terms of transportation management and environmental sustainability. We would note that the central distribution system that Tesco currently operates is based on the most efficient and environmentally friendly delivery models and that altering this system could impact on its efficiency and sustainability.

As such, deliveries are an important part of the operational requirements for convenience retailers and in cases where convenience retail facilities are co-located with residential uses, a realistic understanding of the requirements of both uses is required. It should be accepted that retail convenience facilities are required in urban locations and while some operational undertakings may result in short-term disruptions, the overall benefit of a sustainable, mixed-use neighbourhood approach should be recognised. This approach would ensure that urban areas can be developed in an efficient/compact manner whilst providing residents with all of the services that they require. We would highlight that the benefits of the convenience retail facilities far outweigh any perceived impact on residential amenity. In this regard, it is submitted that careful consideration needs to be given to the location of commercial uses and any restrictions which may impact on retailers operational requirements.

As outlined above, Tesco Ireland welcomes the proposed RSES for the Eastern and Midland Region. The retail sector is a significant employer in the region, which also plays a key role for the region's economy and in creating liveable places. While the EMRA supports the preparation of a new retail strategy for the Region which is reflective of current economic conditions, it is submitted that this objective is a priority for the EMRA and it is requested that this strategy is prepared as soon as possible.

We would request that the above matters be considered during the finalisation of the RSES process. Should you have any queries on the above, please do not hesitate to get in contact with the undersigned.

Yours sincerely,



Simon Bradshaw
Principal Planner
For and on behalf of GVA Planning and Regeneration Limited

