



**Submission to Draft Development
Plans: Kilkenny County Development
Plan 2014-2020**

Party	Signed	Date of Final Version
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1.0 Introduction

This submission is made on behalf of Tesco Ireland Ltd. As the Council will be aware, Tesco has yet to gain a presence in Kilkenny City and County despite a number of attempts over the past 10 years to achieve planning permission.

This has partly been as a result of the lack of planning friendly sites and moreover relatively unclear retail planning policy. Many of the key points that inform this submission were made in the Company's pre-draft submission summarised below:

Tesco Ireland is a major investor and job creator within the Irish economy. Retail has sustained jobs over the past 5 years and suitable weight must be attributed to this fact, as highlighted in the Retail Planning Guidelines 2012, when considering the merits of planning applications.

Tesco Ireland remains committed to seeking a presence in Kilkenny with priority for investment focused on the City. However, the viability of delivering a new foodstore in the City will require practical, commercially aware solutions when allocating sites for retail and other commercial uses in the Development Plan. *Clarity of Vision* is also critical. A realistic assessment of where certain retail formats should be located is essential.

The Key Message

The Retail Planning Guidelines is clear that Council's must be *realistic* and ensure that they approach this task paying due regard to typical retail formats: retailers are only required to make "*reasonable compromises*" in their formats according to the Retail Planning Guidelines.

Therefore, it will be imperative that the retail potential of lands are discussed with retailers/developers. Failing to engage proactively, in our experience will lead to lost investment further down the line.

In this regard, potential retail site must be *suitable, available and viable*. In particular if a site is *no viable* (under the new tests introduced in the 2012 Retail Planning Guidelines) it will not be developed for retail purposes. These matters have to be investigated fully at the Development Plan allocation stage.

Other touchstone issues for retailers include *suitable car parking and accessibility*. Put simply, Kilkenny does not have and will not have the ability to allow for a substantial move away from the private car. Therefore, the aim of Smarter Travel is to locate development where it can best encourage the use of other modes of transport. However, the private car will still be needed for work, leisure and shopping and to that end; sites must be accessible by this critical means of transport.

Finally, the floorspace committed at Ferrybank should not penalise the capacity assessment. At present this Level 2 District Centre has removed all capacity for new convenience floorspace by 2014 in the Level 1 Kilkenny City. That is not a sustainable position. Its floorspace should be discounted at this time as it unnecessarily deflates the capacity assessment.

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¹ Please note that this submission has been made to both the City and County Development Plans given the level of cross over in the retail issues contained within both documents.

2.0 Background – Population Growth/Retail

The Draft Plan indicates the relatively high incidence of population increase in the county and city since 2006 with an overall growth of 10%, a rate higher than the State average and other counties in the South East region.

Although population growth between 2006 and 2011 was greater than the national average it did not outstrip Regional Population Targets (included in the Regional Planning Guidelines) so these have been adjusted to account for the 2011 Census results (Table 1.1).

	2011	2012	2014	2016	2020	2022
Kilkenny county	95,419	96,873	99,781	105,598	109,802	111,903
Kilkenny City	24,423	24,723	25,323	25,800	27,400	28,200

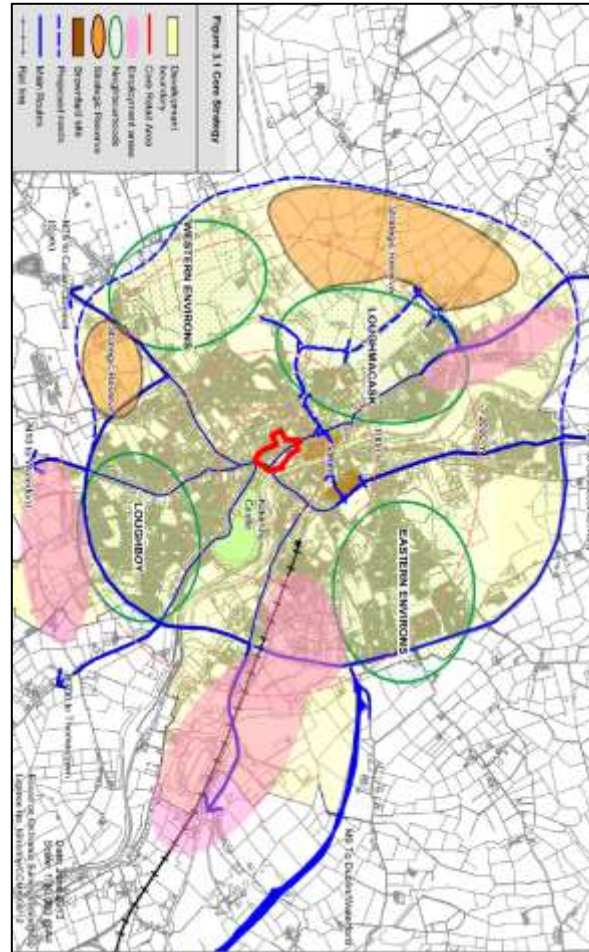
Between 2011 and 2020, the total population allocation for the city and its environs will be 2,977 persons generating a housing land requirement of 57.9hectares.

Distribution of Housing land Requirement

The established pattern of growth in the City has consistently been based on the ‘four neighbourhood model’ established in the 2008 Development Plan. These neighbourhoods are:

1. Loughboy /Archer Street

2. Newpark Upper/Eastern Environs
3. Poulgour/Wetlands/Western Environs
4. Loughmacask



Retail and the City Centre

The Draft Plan indicates its intention to retain and continue to apply some aspects of the 2005 City Centre Local Area Plan including the inclusion of an extended strategy for the development of the Bateman Quay site alongside the Diageo lands to its west which have only recently become available.

The overall intention for the city centre is to place greater emphasis on the central core in maintaining the vitality and viability of the City².

Retail Strategy

The original retail strategy of 2002 has been reviewed a number of times in 2005 and 2008 and has been updated again to ensure it is consistent with the 2012 Retail Planning Guidelines and includes:

- Confirmation of the retail hierarchy,
- Definition of the core retail area of town centres
- A broad assessment of the requirement of additional retail floorspace
- Strategic guidance and action initiatives to encourage the improvement of town centres, and
- Identification of criteria for the assessment of retail developments³.

² Page 15

³ Page 45

Retail Hierarchy

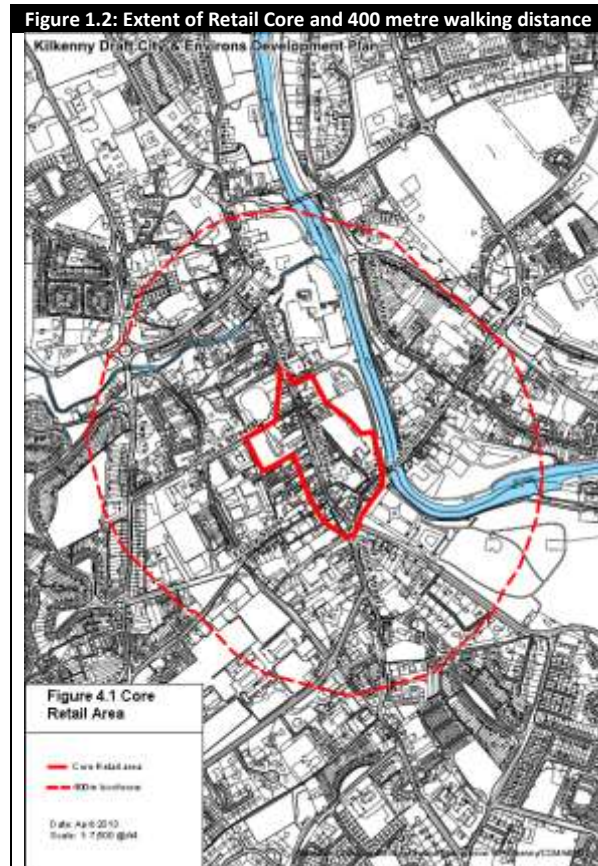
The City and County Plans confirm the Retail Hierarchy for the area set out in table 1.2 overleaf.

Level	Retail Function	Centre
Level 1:	Major Town Centre/County Town	Kilkenny City and Environs
Level 2:	District Centre	Ferrybank (part of Waterford environs)
Level 3:	District/Sub county town	Callan, Thomastown, Castlecomer, Graiguenamanagh
Level 4:	Neighbourhood Centre	As designated for Kilkenny City and Environs (Newpark, Loughboy, Loughmacask, Western Environs) and Ferrybank/Belview area in the Environs of Waterford City
Level 5:	Small Town/Village centre/rural area	Various

City Retail Core

The defined retail core of the city is illustrated at Figure 1.2 below and includes High Street, Market Cross Shopping Centre, Roselyn Street, and St Kieran's Street. The purpose of the area is to:

- Provide greater scope to diffuse the retail floorspace around a wider area⁴



Retail Capacity

A review of the retail capacity has been undertaken for the eight years between 2012 to 2020, for the entire County, including the city and environs.

The final figures are presented at page 50 of the Development Plan repeated below at Table 1.3:

	2012 (sqms)	2014 (Sqms)	2020 (sqms)
Convenience	3,497	-1,409	1,599
Comparison	11,587	8,525	16,502
Bulky Goods	-6,820	-5,992	-4,391

Noting the figures apply to the entire county and city, they illustrate the relative lack of capacity for new convenience retail in contrast to the relatively substantial levels of comparison floorspace capacity. Indeed, once a number of convenience extant come on line in 2014 capacity for new space is reduced to a negative residual figure of -1,409sqm.

The granting of permission for two ALDI stores in the city and one in Callan and a further LIDL store in the city area (total net sales of 4,533sqms) does impact on the final quantitative figures but it is unclear how these deducted from the final totals of available expenditure. For example if too high a sales density was applied to this discount space, residual capacity may have been impacted.

We note that in the detailed retail study that informed the strategy a sales density (SD) of €13,000/sqms has been applied to new floorspace. It is not explicitly stated that this SD was applied to the net sales space of the four discounters but it does appear high given that most stores of this nature trade (accepted by both planning authorities and the Board) around the €7500-€8000/sqm mark.

The difference with the lower sales density is that they would turnover at roughly €36m as oppose to €58m a large difference of some €22m. To further compound this assessment Ferrybank shopping centre is then deducted at 2014 resulting in

⁴ Page 46

negative, residual, convenience capacity (see Table 1.3 above).

Retail Spending Leakage - City

Appendix A⁵ notes the growing level of convenience leakage in 2002 rising from 19% to 30%. It comments that *“as it is generally accepted that convenience shopping is undertaken locally, with leakage in urban areas being more of the order of 10%, the level of convenience expenditure leakage (30%) is still significant”*.

The opening of a large modern format convenience floorspace in the Ferrybank District Centre and the opening of additional discount retailers in the city will serve to help redress the issue but, even with these emerging developments, the facts indicate that the City and County require further enhancement and strengthening of their main food convenience offers”.

Retail Spending Leakage - County

In the context of County towns, Callan is underperforming substantially relative to the other designated level 3, District towns with at least 60% outflow of main food shopping trips. The small ALDI store at Chapel Lane, will certainly help to reduce leakage to Kilkenny (Table 3, Appendix 1) but at best that will remain at circa 30-40% compared to the recommended 10%⁶.

Sequential Location Issues

⁵ Page 21

⁶ Page A21, Appendix 1.

The development Plan considered the potential for new retail in a sequential manner noting that:

Core Retail Area

There are few opportunities in the core retail area for new retail development save for reuse of vacant properties.

Edge of Centre

The established retail strategy promoted the Mart Site. The new strategy points to the recent opportunity at the Diageo lands and permission in 2011 for the Central Access Scheme.

Although noting the potential of both these edge of centre sites, the plan highlights the particular importance of the Diageo lands:

“Having regard to the sequential approach to retail development, the potential synergy between the Smithwick site and the existing retail core area, the potential to deliver other planning objectives linked to the public realm and tourism and the potential to contribution of the site to the vitality and vibrancy of the city centre area generally, it is considered that the Smithwick’s site should be the focus for retail expansion in the city and environs over the plan period”⁷.

Joint Retail Strategy (Ferrybank Shopping Centre)

Kilkenny has committed to engaging with Waterford, Tipperary and Wexford with a view to preparing a joint retail strategy for the region.

⁷ Page 52.

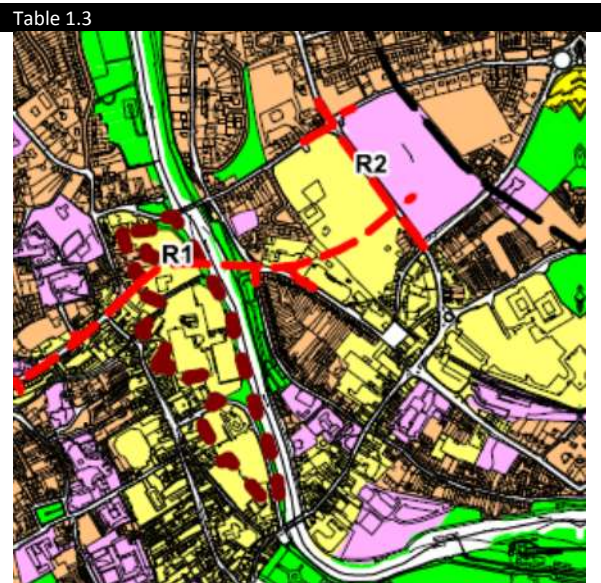
Within the context of its discussion on the joint strategy the plan is clear that Ferrybank is a designated district centre and notes its scale: 4577sqms net convenience and 4341sqms comparison. The plan supports its potential function as a community service for the north Waterford suburb.

3.0 Other Issues

Zoning

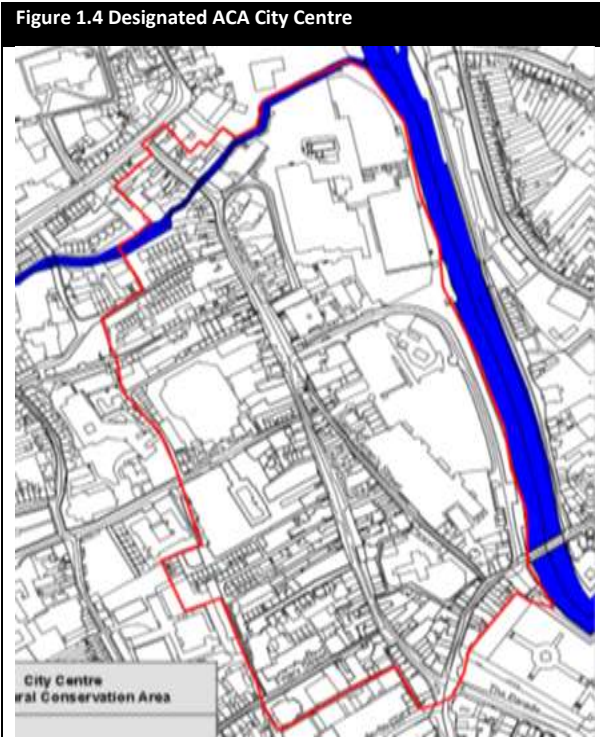
Both the Mart and Diageo sites are zoned “**general business**”. The objective of this zone is to: *provide for general development*. Multiple uses are permitted in this zone.

The dashed (dark) red line is the extent of a proposed masterplan covering the Diageo and Dunnes car park sites. We understand work is progressing quickly on this masterplan with consulting Architects/Urban Designers already appointed.



Conservation

Part of the Diageo site falls inside the City Centre Architectural Conservation Area.



Car parking

The standard proposed for shopping centres and supermarkets is 1space/25sqms gross floor area derived in the case of the City from the Kilkenny City Centre Local Area Plan⁸.

That Local Area Plan also advocates replacing free parking with paid parking⁹.

Plot Ratio/Site Coverage

Set as a maximum of 2.0 in City Centre and 1.0 in the rest of the city.

Site coverage will be 85% in the City Centre and 65% elsewhere.

⁸ Page 25

⁹ Section 2

4.0 Recommendations – Kilkenny City Draft Development Plan

Deriving from the above review we set out a series of broad recommendations. Additions are highlighted in green.

Recommendation TBP 1: Determining level of retailers demand and operational

The Diageo site has been given priority as a location for mixed use development including retail ahead of the Mart site. However, the nature of that retail offer has not been specified.

Specifically, the demand by high end comparison and convenience retailers should be considered as well as their respective floorspace requirements. We would suggest the following addition to paragraph 4.7.1.2 of the City Development Plan:

“Having regard to the sequential approach to retail development, the potential synergy between the Smithwick site and the existing retail core area, the potential to deliver other planning objectives linked to the public realm and tourism and the potential to contribution of the site to the vitality and vibrancy of the city centre area generally, it is considered that the Smithwick’s site should be the focus for retail expansion in the city and environs over the plan period.

A review will be undertaken as part of the preparation of the Masterplan for the Diageo site to determine the level of interest from high end comparison and convenience retailers. This will

specifically seek to understand their respective floorspace and operational requirements”

Recommendation TBP2: Consultation with developers and retailers

The Retail Planning Guidance 2012 (‘RPG’) advocates the sequential approach when locating new retail development; the preferred location is the town/city centre. Tesco Ireland supports this approach. The sequential approach applies at both the Development Management and Development Plan making stages and when reviewing their Plans, Councils’ are charged with allocating suitable sites for new retail floorspace.

However, a major concern for retailers, such as Tesco, has been the historic approach taken by Councils when allocating or designating sites for retail development. Often sites have been allocated without any real appreciation for the operating requirements of the retailer or the differences in format within the retail market. The result is an undesirable scenario where the developer or retailer must attempt to “make their retail format fit the site” creating unnecessary delay, diverted investment and lost job opportunities. To this end the RPG notes that applicants’ should be flexible when assessing central sites but also points to the role of the Council when allocating sites for retail:

“The application of the sequential approach requires flexibility and realism on the part of both retail developers and planning authorities, to ensure that the various forms of retailing are developed in the most appropriate locations. Planning authorities

*must therefore carefully consider the retailing needs of their cities and towns through the policies and objectives in a development plan and relevant retail strategies if appropriate. They should address matters such as how to broaden the retail offer of the city/town centre and identification of opportunity sites of varying sizes. Planning authorities should establish implementation teams to **proactively engage with landlords, tenants’ retailers, chambers of commerce etc. to bring forward/amalgamate sites for development which have been identified as suitable.** In so doing planning authorities must be mindful of their role in deciding on any future application on such sites”. (RPG Section 4.5, emphasis added)*

The concept of ‘realism’ is foremost when developing public retail policy and most importantly when allocating lands, especially for larger store formats, designed to cater for weekly food shopping.

Tesco Ireland will consider sites in central locations but only if their allocation and subsequent promotion through public policy is based on a realistic appreciation of their format. In our experience, detailed ‘urban design’ led strategies with little commercial input are usually redundant documents and result in inevitable lost investment. We would refer the Council for example to the recent acceptance by Clare County Council that the Masterplan for Shannon was grossly over designed resulting in a commercially unviable strategy that has now been shelved with only its broad policy sentiment retained.

In support of our position, the RPG notes that retailers are only required to make “reasonable compromises”¹⁰, in their standard formats when assessing potential sites, so there is a genuine imperative to ensure plots are suitable and viable for purpose. Factors that need to be reviewed with developers and retailers include:

- Access by HGVs and cars
- Safe pedestrian movement
- Single level retailing
- Accessibility for less mobile shoppers
- Easy access between car park and shop
- Adequate parking

At the most basic operational level, there are two types of retailer: those that operate from single purpose structures, on one level, with dedicated parking and those operating from smaller “high street” units often with shared parking. Attempting to ‘shoehorn’ the former into medieval street patterns is extremely difficult

Furthermore, part of the assessment of a site’s viability for retail is to understand whether it can be brought forward to market in a reasonable timeframe, taking account of the actual need for additional floorspace at the time of the assessment. If it cannot, then other options that pose fewer barriers to delivery (including edge of centre and potentially out of centre locations) should be considered.

The following recommendation should be inserted as a new section 4.7.1.4 under the sub section entitled “Review of Retail Potential”:

“In promoting central locations for new retail development the Council recognises the inherent difficulties of introducing retail formats into historic, confined locations. To this end, the Council will seek to proactively engage with developers and retailers to understand their requirements when allocating sites for new retail floorspace”.

Recommendation TBP 3 – The Sequential Approach

The City Development Plan does not fully quote the Sequential Approach. The approach does not exist only to ensure that central sites are developed. It allows other sites to be considered where central or edge of centre sites are not **Suitable, Viable or Available**. To this end, it is important that the Development Plan recognises how these three tests are applied and measured. The following text should be included after bullet point No.2 at section 4.8.2.1:

In relation to whether sites can demonstrate suitability, availability and viability, the following should be taken into account in implementing the sequential approach.

- a) Suitability: Matters to be considered include whether or not the development is consistent with development plan objectives, in particular zoning objectives, current land use activity in the vicinity of the site, size, capacity to accommodate development, traffic and transportation issues; and/or;*

b) Availability: this criterion relates to site ownership, ease of assembly and timing. Sites must be genuinely available for development at the time that site acquisition/assembly begins or within a reasonable time-frame; and/or;

c) Viability: the financial viability of a development is also a key consideration. The cost of site acquisition in the town centre may make a proposal unviable and force investors to look elsewhere in the area. Excessive development costs relative to values are also a consideration. For example, the requirement to deal with remediation for a brownfield site may have the potential to make a proposal unviable.

Recommendation TBP 4: Car Parking and Accessibility:

One particular operational requirement for food retailers will be access to adequate adjacent car parking. The proposed standard for foodstores is 1 space per 25sqms gross floor area.

This in itself is relatively conservative standard compared to other county councils with large car dependent rural populations, as demonstrated by the household survey carried out as part of the preparation of this Draft Plan. Likewise, the Shopper Surveys conducted as part of the Retail Study (Appendix 1) illustrates the two main improvements required are more free parking and more parking generally.

¹⁰ RPG Section 4.5

“We would request that the Council considers a less conservative standard for supermarkets of 1 space per 14 sqms. This should be separated out as a unique category in Table 10.5 “Car Parking Standards”.

As an alternative a caveat should be inserted as a foot note to the table reference back to the appropriate standard, noting the following:

“The Council recognises the importance of parking to the investment decisions of the retail market and car dependent nature of the City and County. The standard for Shopping Centres and Supermarkets will be applied flexibly”.

Accessibility

Kilkenny will continue to be dependent upon the private car as the main mode of transport for work, leisure and retail trips. Therefore, whilst it is important to ensure that new development is located in such manner as to ensure the potential of other modes are realised the balance must continue to favour the private car for the time being. In so far as parking is critical to attract retailers to locations such as the Mart and Diageo so the level of accessibility by private car will also be important.

Access to the Mart and Diageo sites should be reviewed to ensure they allow adequate access for the private car. The proximity of possible retail sites, especially for food retailing should also be considered.

Recommendation TBP 5: The Diageo Site and Car Parking

Car Parking

A decision has yet to be made regarding the treatment of parking at the Diageo site and the Mart site. Significant emphasis is placed on the walkability of Kilkenny’s compact urban centre. That is reasonable, but the city must still attract shoppers to the centre and invariably those trips will be done by car.

Placing further limitations on parking, for example at the Diageo site, will actively discourage retailers from locating there. Investment simply will not be progressed by some parties. As noted in the Retail Planning Guidelines (section 2.5.4) the aim is to get the right location to *encourage smarter travel*. It does not advocate forced or compulsory change but acknowledges that some shopping trips are difficult to make without the car. Rather it promoted the integration of alternatives modes of transport.

“As part of the preparation of the Masterplan for the Diageo site, consideration should be given to ensuring there is adequate car parking for the potential end retail users”.

TBP 6 – Ferrybank Shopping Centre

There has been extensive debate on the future of the Ferrybank shopping centre. Likewise, the capacity assessment provides for relatively limited retail capacity convenience floorspace. Part of the reason for that the Ferrybank floorspace has effectively

penalised the capacity figures for the entire Kilkenny area leaving a negative, convenience, residual in 2014 of -1409sqms.

Noting what we said about the methodology used to deduct the permitted discount retailers from headline capacity, further reducing capacity by subtracting Ferrybank will create a very substantive headline issue for retailers moving forward.

For example, the Board will look to this sort of information when making their decisions on new retail development especially on edge and out of centre sites. If they observe conclusions in the County Retail Strategy such as negative, residual capacity, it could be used to refuse planning permission.

Committed retail space at Ferrybank District Centre should be removed from the capacity assessment. This would assist in releasing additional spending power for Kilkenny City which sits above Ferrybank in the Retail Hierarchy.

5.0 Recommendations – Kilkenny County Draft Development Plan

The following recommendations relate to the Kilkenny County Development Plan. We note that the retail strategy section of the Plan has essentially been replicated in the County Plan so there is overlap between these and recommendations in the preceding chapter.

Recommendation TBP1 Consultation with developers and retailers

The Retail Planning Guidance 2012 ('RPG') advocates the sequential approach when locating new retail development; the preferred location is the town/city centre. Tesco Ireland supports this approach. The sequential approach applies at both the Development Management and Development Plan making stages and when reviewing their Plans, Councils' are charged with allocating suitable sites for new retail floorspace.

However, a major concern for retailers, such as Tesco, has been the historic approach taken by Councils when allocating or designating sites for retail development. Often sites have been allocated without any real appreciation for the operating requirements of the retailer or the differences in format within the retail market. The result is an undesirable scenario where the developer or retailer must attempt to "make their retail format fit the site" creating unnecessary delay, diverted investment and lost job opportunities. To this end the RPG notes that applicants' should be flexible when assessing

central sites but also points to the role of the Council when allocating sites for retail:

"The application of the sequential approach requires flexibility and realism on the part of both retail developers and planning authorities, to ensure that the various forms of retailing are developed in the most appropriate locations. Planning authorities must therefore carefully consider the retailing needs of their cities and towns through the policies and objectives in a development plan and relevant retail strategies if appropriate. They should address matters such as how to broaden the retail offer of the city/town centre and identification of opportunity sites of varying sizes. Planning authorities should establish implementation teams to proactively engage with landlords, tenants' retailers, chambers of commerce etc. to bring forward/amalgamate sites for development which have been identified as suitable. In so doing planning authorities must be mindful of their role in deciding on any future application on such sites". (RPG Section 4.5, emphasis added)

The concept of 'realism' is foremost when developing public retail policy and most importantly when allocating lands, especially for larger store formats, designed to cater for weekly food shopping.

Tesco Ireland will consider sites in central locations but only if their allocation and subsequent promotion through public policy is based on a realistic appreciation of their format. In our experience, detailed 'urban design' led strategies with little commercial input are usually redundant documents and result in inevitable lost investment. We would

refer the Council for example to the recent acceptance by Clare County Council that the Masterplan for Shannon was grossly over designed resulting in a commercially unviable strategy that has now been shelved.

In support of our position, the RPG notes retailers are only required to make "reasonable compromises", in their standard formats when assessing potential sites, so there is a genuine imperative to ensure plots are suitable and viable for purpose. Factors that need to be reviewed with developers and retailers include:

- Access by HGVs and cars
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At the most basic operational level, there are two types of retailer: those that operate from single purpose structures, on one level, with dedicated parking and those operating from smaller "high street" units often with shared parking. Attempting to 'shoehorn' the former into medieval street patterns is extremely difficult

Furthermore, part of the assessment of a site's viability for retail is to understand whether it can be brought forward to market in a reasonable timeframe, taking account of the actual need for additional floorspace at the time of the assessment. If it cannot, then other options that pose fewer barriers to delivery (including edge of centre and

potentially out of centre locations) should be considered.

The following recommendation should be inserted as a new section 4.8.1.4 under the sub section entitled “Review of Retail Potential”:

“In promoting central locations for new retail development the Council recognises the inherent difficulties of introducing retail formats into historic, confined locations. To this end, the Council will seek to proactively engage with developers and retailers to understand their requirements when allocating sites for new retail floorspace”.

Recommendation TBP 2 – The Sequential Approach

The County Development Plan does not fully quote the Sequential Approach. The ‘approach’ does not exist only to ensure that central sites are developed. It allows other sites to be considered where central or edge of centre sites are not **Suitable, Viable or Available**. To this end, it is important that the Development Plan recognises how these three tests are applied and measured. The following text should be included after bullet point No.2 at section 4.9.2.1:

In relation to whether sites can demonstrate suitability, availability and viability, the following should be taken into account in implementing the sequential approach.

a) Suitability: Matters to be considered include whether or not the development is consistent with development plan objectives, in particular zoning objectives, current land use activity in the vicinity of

the site, size, capacity to accommodate development, traffic and transportation issues; and/or;

b) Availability: this criterion relates to site ownership, ease of assembly and timing. Sites must be genuinely available for development at the time that site acquisition/assembly begins or within a reasonable time-frame; and/or;

c) Viability: the financial viability of a development is also a key consideration. The cost of site acquisition in the town centre may make a proposal unviable and force investors to look elsewhere in the area. Excessive development costs relative to values are also a consideration. For example, the requirement to deal with remediation for a brownfield site may have the potential to make a proposal unviable.

Recommendation TBP 3: Leakage in Level 3, District Towns.

The household survey illustrates the continued dependence by Level 3, District Towns on Kilkenny’s main food offer. This position will require continued monitoring to ensure unsustainable shopping patterns are not allowed to persist over time. This especially true of Callan, Castlecomer and potentially Thomastown.

In accordance with the objective for District towns set out at section 4.8.3 we would recommend the following addition:

“Objective: To sustain and enhance the vitality and viability of the role and potential of the four District

Towns”. Specific emphasis will be placed on encouraging new convenience floorspace in appropriate locations within District towns”.

Recommendation TBP 4: Car Parking:

One particular operational requirement for food retailers will be access to adequate adjacent car parking. There has been significant focus on whether or not to allow parking level in line with wider standards in the Development Plan. The County Plan intends to replicate the City parking standard for foodstores at 1 space per 25sqms gross floor area.

This is a very conservative standard compared to other county councils with a large dependent rural population who have a significant dependence on the private car for shopping¹¹ as demonstrated by the household survey carried out as part of the preparation of this Draft Plan. The Shopper Surveys conducted as part of the Retail Study (Appendix 1) illustrates the two main improvements required are more free parking and more parking generally.

We would request that the Council considers a less conservative standard for supermarkets of 1 space per 14 sqms. This should be separated out as a unique category in Table 11.2 “Car Parking Standards”.

¹¹ The incidence of which will be higher in the dispersed settlement pattern of rural areas than in Kilkenny city.

