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Email: [admin@rmla.ie](mailto:admin@rmla.ie)  
Date: 9<sup>th</sup> December 2024

Dear Sir/Madam,

**Re: Draft Carrick-on-Suir Local Area Plan 2025-2031.**

We, RMLA Limited, are acting for our Client, Tesco Ireland Limited, Gresham House, Marine Road, Dún Laoghaire, County Dublin in response to the publication of the Draft Carrick-on-Suir Local Area Plan 2025-2031 (hereafter, the Draft LAP).

Please note all correspondence in relation to the submission should be sent to the Agents, RMLA Limited, Unit 3B, Santry Avenue Industrial Estate, Santry Avenue, Santry, Dublin 9, D09 PH04. We would request that the Local Authority keep us informed of any updates relating to this public consultation.

The retail sector makes a major contribution to Ireland, by increasing the vitality and viability of its town centres and villages. It also 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 Draft LAP.

**Background**

Tesco Ireland is one of the primary convenience retailers in Ireland with 179 stores in cities and towns across the Country. Tesco operates 6 no. stores across Tipperary, which provide essential retail services to local communities. While Tesco does not currently operate a store in Carrick-on-Suir, Tesco are continuously reviewing opportunities to sustainably grow its business and it is requested that the Draft LAP adopt retail policies that support future opportunities for retail development, ensuring that both existing and future facilities can adequately meet local demand.

The Draft LAP projects a population increase of c. 1,154 persons from 2016, bringing the total to c. 6,925 persons by 2031. The proposed population increase figures for Carrick-on-Suir align with the Core Strategy of the Tipperary County Development Plan 2022-2028 (hereafter 'Development Plan'). Taking this into consideration, it is important that the Draft LAP accommodates this growth by not only supportive policies and objectives to provide for residential and employment lands, but also the necessary supporting infrastructure and services such as education, commercial, retail, and specifically new convenience retail floorspace within the town to meet future demand.

As Carrick-on-Suir's residential areas expand and new residential developments are brought forward, it is imperative that the town's retail offering and in particular the opportunity for new retail development is supported.

## Planning and Vision

As outlined above, as part of its ongoing store location programme, Tesco is reviewing opportunities to sustainably grow its business at appropriate locations within the Country across a range of formats. Such opportunities, and associated investment would positively contribute to the overall development of the towns and villages across Ireland; and 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 and 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.

The Draft LAP can facilitate the delivery of new retail floorspace, investment and job creation within Carrick-on-Suir through the implementation of supportive retail policies. Such policies, in turn, help to contribute to the economic growth of the town 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.

## Supportive Retail Policies

Given the projected population increase of the Draft LAP, it is submitted that the future provision of retail facilities should be considered and facilitated as part of the Draft LAP. It is important that new residential growth areas are adequately served by retail facilities and as such, it is requested that the Local Authority provide flexibility with regard to zoning policies in order to facilitate the provision of scale-appropriate retail floorspace at appropriate locations.

In relation to new convenience retail development, the Draft LAP states it will only be acceptable where there is a demonstrated need, and where it supports the town centre. Furthermore, under the Draft LAP Section 3.7 Policy and Objectives, Policy 3.1 states:

*“Enhance the quality of the Town Centre by supporting the **collaborative redevelopment and reuse of vacant and underused sites** and areas in the ‘Urban Core’ and ‘Compact Growth’ area, in particular, to support the redevelopment of Town Centre ‘Regeneration Sites’ and areas zoned for ‘Regeneration’.”*

Tesco Ireland supports the objective outlined above in the Draft LAP while also advocating for the inclusion of flexibility for retailers within the Draft LAP to address the evolving needs of modern convenience retailers.

## Importance of Local Retailing

While town centres are commonly the primary location for retail uses, it is important to recognise that town centres cannot always accommodate new retail development due to site constraints such as plot size, site layout, parking requirements, delivery access, flooding etc. When suitable sites are not available in the town centre, edge-of-town centre sites must be considered with flexible zoning objectives to accommodate a modern convenience retail store with an appropriately sized floorspace.

Following initial feasibility assessments, it is considered that there are limited sites that can facilitate a modern convenience retail floorplate within the town centre and it would be beneficial if the Draft LAP could also identify appropriate edge-of-centre locations that can be developed for convenience retail use.

## Regeneration

The NPF seeks to establish self-sustaining communities throughout the Country through Town Centre regeneration and it is considered that the adequate provision of services such as retail will be central to the fulfilment of this objective.

The provision of self-sustaining communities throughout the County can generate employment growth, invigorate town centre areas, promote sustainable travel patterns and contribute to an improved quality of life for residents. Having regard to the projection population increase, we request that the County Council consider the future provision of retail convenience floorspace holistically and ensure that the settlement of Carrick-on-Suir is adequately served by such floorspace. The inclusion of supportive policies and flexible land use zoning objectives would be welcomed by retail operators such as Tesco.

## Requirements of Retailers

Retailing and convenience retailing, in particular, have, very specific requirements relating to access, servicing, shape and morphology of sites. Typically, convenience retailing, will require extensive, unobstructed floorspace with associated space for car and bicycle parking. Having regard to this, it is noted that, characteristically, town/village centre areas are comprised of historic buildings, many of which often consist of irregular floor layouts or are subject to change in floor levels. Where suitable sites with these characteristics become available in and around the town centre, 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 size. 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

Furthermore, convenience retail stores require car parking spaces to serve customers who are doing their weekly shop and unable to transport their goods without the use of a private motor vehicle. The Retail Planning Guidelines acknowledges that the weight of a weekly convenience shopping means public transport or walking are not feasible options. Having regard to this, it is worth highlighting the important role of Click + Collect facilities. Such facilities offer an extremely efficient and important service, which allows customers to collect their shopping at a time that suits them, without the requirement to enter the store. Click + Collect facilities have a small spatial requirement, are typically located in dedicated, easily accessible areas of customer car parks e.g., adjacent to mobility-impaired and parent-and-toddler spaces. These spaces offer a highly efficient grocery/convenience service that reduces customer downtime, minimizes car parking demand, and optimizes land use.

Modern retail models focus on delivering competitive goods at accessible locations, balancing flexibility with regard to the overall scale of the store and the physical layout of the building. Key considerations for new retail developments include public realm quality, retail layout, traffic management, servicing and deliveries, parking, health and safety, and compliance with planning policies. In order to attract retailers, it will be important for retail policies to support 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 in convenience retailers, include *inter alia*, a cage marshalling area, bulk storage, colleague facilities, offices and administration areas, to ensure the efficient operation of a supermarket. 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 designed to reduce delivery frequency by providing sufficient storage areas for holding stock and adequate chilled areas. 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.

### **Conclusion**

Our client welcomes the publication of the Draft Carrick-on-Suir Local Area Plan 2025-2031 and the opportunity to engage with the Local Authority prior to the finalisation of the Plan. Tesco Ireland is an established retail operator throughout Ireland and is committed to providing the best possible service to its customers.

Having regard to the points highted above, we respectfully request that the Local Authority continues to engage with retail operators to understand the operational and flexibility of modern retail convenience store. In particular, we highlight the importance of incorporating flexibility into the Local Area Plan to support future opportunities for retail development. This includes accommodating evolving retail formats, ensuring appropriately zoned lands, and fostering retail policies.

- Provide flexible land use zoning objectives that will allow sites to be brought forward in the town for convenience retail development over the lifetime of the Plan.
- Acknowledge the requirements of modern retailers including appropriate floorplates, car and bicycle parking and servicing access, where possible.
- Provide policies and objectives that can spur investment in the convenience retail sector and provide for adequate convenience floorspace within the town.

We trust that the points raised in this submission will be carefully considered by the Local Authority. Should you have any queries, please do not hesitate to contact us.

Yours Faithfully,



**Muirenn Duffy**

Director, For and on Behalf of RMLA Limited