

2 – 4 Merrion Row Dublin 2 D02 WP23

T: +353 (0)1 661 8500

avisonyoung.com



7th October 2020

Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore,
County Offaly.

Dear Sir/Madam

Re: Draft Offaly County Development 2021-2027

## 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 Offaly County Development Plan 2021-2027 (hereafter, Draft Offaly CDP). Tesco Ireland, being one of the primary convenience retailers in Offaly, welcomes the opportunity to make a submission on the preparation of the Draft Offaly CDP.

The retail sector makes a major contribution to Offaly's urban areas by increasing their vitality and viability and acting as an economic anchor, creating significant employment and indirect economic and social activity. In this regard, we welcome this engagement by Offaly County Council. We would encourage the Local Authority to continue to engage with stakeholders in the retail sector to ensure that there are appropriate polices in the Offaly CDP to attract new investment in the county, protect the viability and vitality of existing retail premises and accommodate refurbishment and expansion of the older premises.



We would like to take this opportunity to identify the importance of convenience retail facilities in Offaly and request that Offaly County Council includes appropriate retail policies and land use zoning objectives in the Offaly CDP 2021 that will protect the important function of these retail facilities as urban areas continue to expand over the plan period.

## Background

Tesco Ireland is one of the primary convenience retail operators in Offaly and one of the largest private sector employers in the State. Tesco currently operates three stores in the County at Birr, Edenderry and Tullamore. Each of these stores are well established retail facilities that provide an important service to their respective communities. To ensure these facilities can continue to provide for the needs of local customers, it is imperative that the Offaly CDP 2021 acknowledges their importance as part of the zoning objectives and general retail policy.

The Draft Offaly CDP targets a population growth of 9,239 people during the lifetime of the Plan. This would represent an 11% increase in the population (based on 2016 Census figures) over a 6-year period and it is considered that the majority of this growth would be accommodated in the existing urban centres of Tullamore, Edenderry and Birr. As existing residential areas in these settlements expand and new residential areas are developed, it is imperative that established retail facilities are protected and that the sustainable growth of these centres is accommodated in line with the Retail Planning Guidelines (2012).

## **Appropriate & Relevant Zoning Objectives**

It is noted that as part of the Draft Offaly CDP, the 'Commercial' zoning objective previously set out under the Birr and Tuliamore Town Development Plans, has been replaced by an 'Enterprise and Employment' zoning objective. While the uses stated as being permitted in principle under this new zoning are generally in line with the previous 'Commercial' zoning, the stated objective of the 'Enterprise and Employment' zoning varies quite considerably from that of the 'Commercial' zoning.

The relatively large-scale Tesco foodstores in Birr and Tullamore are both now designated under the 'Enterprise and Employment' zoning as part of the Draft Offaly CDP. This zoning objective

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appears to conflict with this established foodstore use at these locations in that it promotes "research and development, light industry, retail warehousing, car showrooms, offices, employment and enterprise related uses". Given the importance of these large-scale retail convenience facilities to established local communities, it is requested that the Local Authority carefully considers whether these facilities should be located within the 'Enterprise and Employment' zoning or whether an 'Existing Retail', 'Neighbourhood Centre' or a general 'Commercial' zoning objective would be more appropriate to secure the long term viability of these facilities which provide an important local service to neighbourhoods that are likely to expand over the plan period.

Should retail facilities become non-conforming under future planning policy, it has the potential to stagnate their sustainable growth in line with changing customer needs and their long-term commercial viability could be threatened. Providing a more appropriate and relevant zoning objective will provide certainty for the retail sector and could help spur investment in these existing centres that would improve the service, offer and experience for existing and future customers.

## Conclusion

Our Client welcomes the publication of the Draft Offaly County Development Plan 2021-2027 and the opportunity to engage with the Local Authority in relation to same prior to the finalisation of the Plan. Tesco Ireland is an established retail operator in the County and is committed to providing the best possible service to its customers. There is concern that the zoning objectives, which have been designated to the areas where Tesco Ireland's established stores are located in Birr and Tullamore, do not accord with the established uses at these locations. It is, therefore, requested that the Local Authority carefully considers the zoning objectives set out as part of the Draft Offaly CDP and the potential impact these zoning objectives could have on important retail facilities in the future.

We trust that the matters outlined above will be taken into consideration as part of the finalisation of the Offaly County Development Plan 2021-2027. 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.

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Yours sincerely,

Muirenn Duffy

Associate Director (01) 661 8500

For and on behalf of Avison Young Planning and Regeneration Limited