



Planning Department,
Galway County Council,
Áras An Chontae,
Prospect Hill,
Galway City.

29th July 2021

Re: Draft Galway County Development Plan 2022-2028

A Chara,

I have been instructed by my client **Joyces Supermarkets**, to prepare a submission in relation to the proposed Draft County Development Plan 2022-2028 (Draft CDP). In particular, this submission relates to **Parking Standards** for Retail Development as set out in "Volume 1" of the Draft CDP.

This submission essentially requests the Council to;

- (1) **Amend "Table 15.5: Car Parking Standards" to apply a car parking standard for Shops at the rate "1 car space per 20sqm net floorspace."**

In essence, it is considered that the car parking requirements for Shop Units as set out in the Draft CDP are excessive. Put simply, the current provisions in the Plan require too many car parking spaces to be provided as part of Shop Units. These requirements exceed customer needs and would result in the inefficient use of development land.

At present, Table 15.5 of the Draft CDP requires the following;

- 1 car space to be provided for every 24sqm of gross floorspace for shop units sizes less than 250sqm
- 1 car space to be provided for every 18sqm of gross floorspace for shop units sizes between 250sqm and 1,000sqm
- 1 car space to be provided for every 12sqm of gross floorspace for shop units sizes greater than 1,000sqm

It is considered that the varied parking requirement for shop units of different size should be standardised, especially as there is a disproportionately high parking requirement for shop units over 1,000sqm. For example, if a supermarket unit of 2,500sqm were to be proposed as part of a planning application, this would require 208 no. spaces to be provided (at the rate 1 space per 12sqm of gross floor area). Such a requirement is utterly excessive and is contrary to the principles of compact growth, sustainable mobility and modal shift. Whilst it is acknowledged that DM Standard 32 of the Draft CDP allows for a certain level of flexibility with respect to infill sites and the potential for dual use parking, it is still considered that the base parking requirement is unnecessarily too high.

As an alternative it is considered that car parking requirements for Shop units should be based on the Net Retail Floor area. In this regard, we refer to the definition of Net retail Floorspace as set out in Annex 1 of the Retail Planning Guidelines (2012). This refers to *"the area within the shop or store which is visible to the public and to which the public has access including fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff, areas occupied by retail concessionaires, customer service areas, and internal lobbies in which goods are displayed, but excluding storage areas, circulation space to which the public does not have access to, cafes, and customer toilets."*

Accordingly, the Net Retail Area refers to the functional shopping/trading areas used by customers within the shop, and excludes areas which are inaccessible to the public. Therefore, as the net retail area/trading area of the shop is where customer/car parking demand is generated, it follows that the net retail area should inform the car parking requirement for the shop.

It is not unusual for the Net Retail area to account for 80% of the gross floor area of a supermarket unit, with 20% made up of "back of house" ancillary/storage areas. However, using the Net Retail area as a basis for parking is much more reasonable, than using the gross floor area.

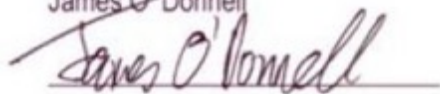
Furthermore, it is considered that a reduced standardised requirement of *"1 space per 20sqm net floor area"* is more appropriate. In this regard we refer to the above example of a planning application supermarket unit of 2,500sqm (gross floor area) were to be proposed. On the basis that the Net Floor Area amounted to 80% of the floorspace (i.e. 2,000sqm), and on the basis that the requested *"1 space per 20sqm net floor area"* car parking standard were to be applied, this would result in a car parking requirement of 100 spaces being required. The latter amount of spaces would be more than sufficient to meet the needs of the retail unit, and would result in a more efficient use of land.

In addition, the request to apply a car parking standard for Shops at the rate *"1 car space per 20sqm net floorspace."*, would be consistent with the provisions of Policy Objective *"NNR8 - Car parking" of the Draft CDP*, which sets out to *"Provide/improve parking facilities in towns and villages in a manner which supports policies relating to promotion of sustainable transport choices and modal shift."*

Finally, it is noted that a *"net floorspace"* standard is recommended for *"Retail Outlets within Petrol Stations"* under the provisions of Table 15.5 of the CDP. As such, in the interest of consistency, the request for a *"net floorspace"* car parking standard for "shops" is required.

On behalf of my client we now look forward to both a detailed and favourable consideration of this submission by Galway County Council. If you wish to clarify any items raised in this submission please do not hesitate to contact me. I would be grateful if you could acknowledge in writing receipt of this submission.

Yours faithfully,

James O'Donnell


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