

**From:** [REDACTED]  
**Sent:** 31 March 2017 11:25  
**To:** National Planning Framework  
**Subject:** Submission on behalf of client

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir / Madam,

I outline below the submission on behalf of Subway.  
Could I ask please for a confirmation of receipt of the submission.

Kind regards,  
Alan Tyrrell  
Divisional Director  
PSG PLUS  
Tel. [REDACTED]

### **The SUBWAY® brand's submission re the National Planning Framework**

In response to the request for submissions to the National Planning Framework, SUBWAY franchisees on the island of Ireland own and operate more than 260 stores and collectively employ over 1800 people. On the island of Ireland SUBWAY is one of the food industry's biggest customers, and the supply chain from producer to retailer further supports the economy. For example, 25% of the bread made in Evron Foods in Portadown, which employs 165 people, is supplied to Subway, and food producers and suppliers in Ireland provide produce to 3400 SUBWAY stores across Europe.

SUBWAY® welcomes the Government's plans to encourage greater regional growth in the National Planning Framework. As such, we would encourage providing incentives for SME operation in small to medium towns, such as business rate reliefs and exemptions.

The SUBWAY® brand, on behalf of SUBWAY® franchisees, plans to continue growing in Ireland with store locations in a wide range of areas. In this context, and considering the National Planning Framework, Subway recommends consideration by government of the needs of entrepreneurs who locate stores in locations across the country. Specifically, we would like the government to consider:

1. fiscal exemptions and higher thresholds for SMEs with regard to the application of business rates, and corporation, capital gains and dividend tax
2. businesses that employ less than 25 people should face fewer employment regulations that otherwise impose a higher and disproportionate compliance cost on SMEs so as to encourage increased employment in a wider variety of locations
3. support for organisations that promote a healthier eating and active lifestyles through both improved education and via the tax system, rather than fiscal penalties which merely distort the market
4. improved access to finance for business start-ups, particularly in areas outside of main urban conurbations
5. undertaking reform of the planning system, ensuring the planning process is simplified and streamlined and not muddled with other areas of public policy
6. recognising franchises as individual business rather than aggregating them for fiscal and regulatory purposes and incentivising SME growth in struggling economic areas, such as regional centres

Likewise, SUBWAY® would encourage the Irish government to advocate for continuity between Northern

Ireland and the Republic of Ireland to continue as much as possible a seamless operation in labour and immigration markets in a post-Brexit environment.

### **Planning reform and the need to enforce best practice and simplify the system**

It is widely considered that planning policy needs root and branch reform to tackle issues like the housing crisis. But planning policy has an important influence on local economic development.

SUBWAY® franchisees believe that in reforming planning policy, simplification of regulations and a positive bias in favour of granting building permissions and business applications should be at the fore. We believe that mixing social policy concerns with the planning system will only distort the market and add to an uneven interpretation of policy by different local authorities. In the Ireland 2040 National Planning Framework, SUBWAY would support incentivising SME growth in rural areas via business rate reliefs and exemptions.

Ends.

**Alan Tyrrell / Agency Director**

**PSG Plus**

E: [REDACTED]

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