June 2021

Retail Statement

Lucan Shopping Centre

Table of Contents

1.0	**Introduction**	3
2.0	**Site Description and Planning History**	4
3.0	**Proposed Development and Justification**	6
4.0	**Assessment of Local Retail Provision**	9
5.0	**Sequential Approach**	13
6.0	**Retail Impact Assessment**	18
7.0	**Summary and Conclusions**	30

Appendix 1 – Catchment Area Plan

1.0 Introduction

1.1 This Retail Statement has been prepared by Savills Commercial (Ireland) Ltd on behalf of ERF Lucan Investment DAC in relation to a planning application at the Lucan Shopping Centre, Newcastle Road, Co. Dublin.

1.2 It is intended to assist the Planning Authority's consideration of the suitability of the proposed development in relation to local, regional, and national retail planning policies and all other material considerations.

1.3 The application seeks planning permission for:

> *'a new two-storey commercial building providing two new units and ancillary accommodation (1,574 sq m gross floor area). Unit 1 will be used as a shop (1,057 sq m), Unit 2 will be used for professional services or health centre or office or gymnasium (517 sq m). The development will also consist of roof plant and PV panels; 'Lucan' advertising signage (50 sq m) and other indicative illuminated signage zones; extended service yard and new access gates; new pedestrian linkage to adjoining 'Somerton' site; reconfigured customer car park and new vehicle charging infrastructure; standalone substation / switch room (30 sq m); hard and soft landscaping, and pedestrian canopy; connection to services; and all associated site and development works.'*

1.4 The current proposal has been the subject of two pre-planning meetings with the Planning Authority on 26 November 2020 and 18 December 2020. These meetings explored the proposed development and the material planning considerations that should be address by the applicant in its submission.

1.5 To comprehensively assess the proposed development against relevant retail planning policies, the remaining sections of this Retail Statement are structured as follows:

- **Section 2** – Site Description and Planning History;
- **Section 3** – Proposed Development and Justification;
- **Section 4** – Assessment of Local Retail Provision;
- **Section 5** – Sequential Approach;
- **Section 6** – Retail Impact Assessment; and

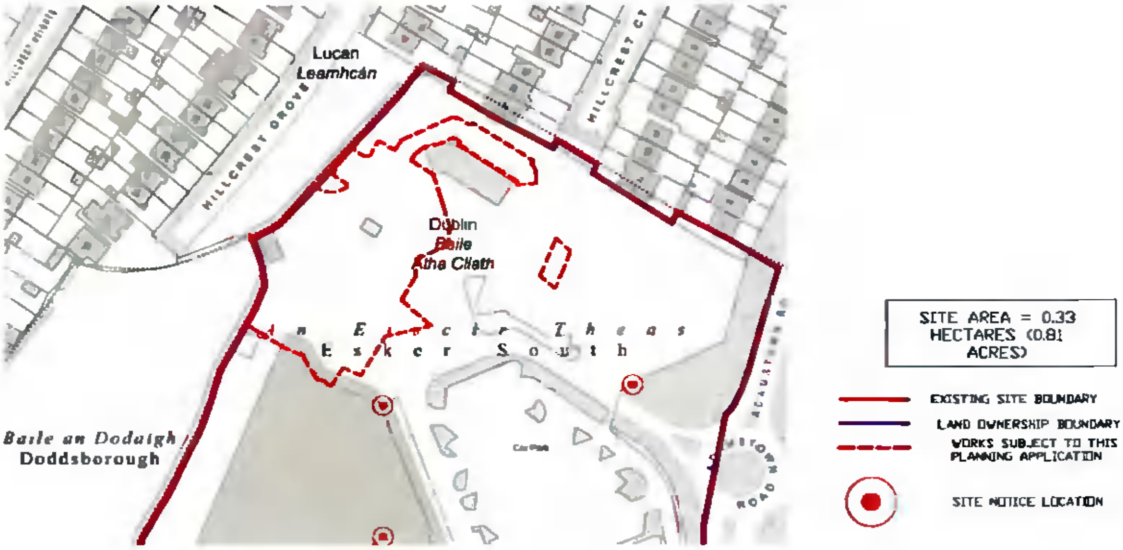
1.6 Finally, Section 7 sets out our summary and conclusions that the proposal accords with an array of national, regional, and local planning policies. It will have a positive impact on the vitality and viability of Lucan District Centre through significant private sector investment.

2.0 Site Description and Planning History

The Application Site

2.1 The application site is located on the Newcastle Road, 250m to the south of the N4. It comprises 0.33ha of lands within the existing customer car park at the Lucan Shopping Centre. The exact location of the Site is detailed on Drawing Reference: PL01-01 – 'Site Location Plan', and in Figure 1 below.

Figure 1: Site Location



2.2 The wider Shopping Centre provides variety of retail related land uses including food retail, café, restaurant, pharmacy and off-licence with a gross floor area (GFA) of ca. 12,192 sq m are currently operating onsite. In addition, Lucan Public Library and a medical practice are also located within the site, to the south side of the existing Shopping Centre building. A total of 702 no. dedicated car parking spaces are provided within the site's surface level (451 no.) and underground (251 no.) car park.

2.3 The Lucan Shopping Centre is a defined Level 3 District Centre in the Council's retail hierarchy. It forms part of the established convenience and comparison shopping patterns of the area.

Relevant Planning History

2.4 The original planning permission for the Lucan Shopping Centre was granted in 1990 (Ref: 89A/2258). The Shopping Centre was subsequently extended following the grant of planning permission on 28 November 1997 (Ref: S97A/0457).

2.5 More recent planning applications have related to small scale physical alternations and change of use proposals.

2.6 The current proposal has been the subject of two pre-planning meetings with the Planning Authority on 26 November 2020 and 18 December 2020. These meetings explored the proposed development and the material planning considerations that should be address by the applicant in its submission. These material considerations included a requirement for a Retail Statement, which this document seeks to satisfy.

3.0 Proposed Development and Justification

The Proposed Development

3.1 The application seeks planning permission for a significant new investment at an established district centre. This will be delivered through the creation of new floorspace on the existing customer car park to the north of the Shopping Centre building.

3.2 As stated in the newspaper and site notices, the application seeks permission for:

'a new two-storey commercial building providing two new units and ancillary accommodation (1,574 sq m gross floor area). Unit 1 will be used as a shop (1,057 sq m), Unit 2 will be used for professional services or health centre or office or gymnasium (517 sq m). The development will also consist of roof plant and PV panels; 'Lucan' advertising signage (50 sq m) and other indicative illuminated signage zones; extended service yard and new access gates: new pedestrian linkage to adjoining 'Somerton' site; reconfigured customer car park and new vehicle charging infrastructure; standalone substation / switch room (30 sq m); hard and soft landscaping, and pedestrian canopy; connection to services; and all associated site and development works.'

3.3 The proposal will result in the creation of 1,574 sq m of net additional floorspace to enhance the vitality and viability of Lucan District Centre. Discussions are ongoing with an operator. but it is anticipated that Unit 1 (1,057 sq m) will be occupied by a discount variety operator selling both convenience and comparison goods. An overview of the operator's core product offer is as follows:

- Food and non-alcoholic drink
- Non-durable household goods: These comprise cleaning and maintenance products for the home including soaps, washing liquids and powders, and disinfectants; articles for cleaning such as brushes, tea towels, and sponges; kitchen and bathroom paper, tablecloths, vacuum bags, and bin liners; clothes pegs and hangers; shoe cleaning products, etc.
- Health and beauty products: Haircare, beauty and skincare, dental supplies, and make up
- Home furnishings
- Electronic accessories for the car and home
- Pet food and products
- Stationery and crafts
- DIY and gardening products
- Clothing, footwear, and accessories

3.4 An operator for Unit 2 (517 sq m) has not been agreed therefore, the applicant is seeking flexibility for the proposed use of the floorspace. We anticipate it will be used for professional services or health centre or office or gymnasium. These uses are all 'permitted in principle' under the site's DC Zoning objective. Should the Council feel it suitable, a planning condition could be attached requiring the first occupier's land use to be confirmed prior to occupation.

3.5 Further details of the design and layout of the development are provided in the Planning Statement and Design Statement.

Justification for Proposal

3.6 The Lucan Shopping Centre is a defined 'District Centre' in the Regional and Local Retail Hierarchy. Planning policy confirms that new retail floorspace should be directed to existing defined and accessible town centres like Lucan.

3.7 The proposed development is at a scale suitable to the Lucan's position in the established Retail Hierarchy. The Retail Strategy for the GDA states that District Centres should provide between 10,000 sq m net and 20,000 sq m net of floorspace. The existing Lucan District Centre provides 12,192 sq m of retail, leisure, and other floorspace. Accordingly, there is ample scope to increase its offering while not altering its position within the Retail Hierarchy.

3.8 Furthermore, the SDCC Development Plan Retail Policy 2 'Sequential Approach' confirms that it is the policy of the Council to guide retail development to existing town, major retail, village, and district centres to sustain their vitality and viability. In accordance with Retail Policy 2 Objectives 1 and 2, the application directs new retail investment and facilities to a highly accessible existing district centre. It will provide a wider range of retail facilities in easy walking distance of existing residential communities.

3.9 The National Retail Planning Guidelines state that:

> *'Where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional retail impact studies* ***are not required.****' (Government Emphasis)*

3.10 It follows that the proposal is fully in compliance with the sequential test.

3.11 Similarly, the National Retail Planning Guidelines state that:

> *'Where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional <u>retail impact studies</u>* ***are not required.****' (<u>Applicant</u> &* ***Government*** *Emphasis)*

3.12 It follows that there is no formal requirement to assessment the retail impact of the proposed development. Irrespective of this, to ensure the Local Authority has all the information required to consider the application, we have undertaken an assessment in accordance with national and regional methodology in Section 6. This demonstrates that the proposal does not give rise to any material concern in respect of retail impact.

3.13 Conversely, there are several positive impacts that must also be considered. The proposal is a positive sign of investor confidence in the local area. One of the indicators that retailers consider when searching for new store locations is the number of existing national multiples present in the local area. The proposed development could attract additional requirements for floorspace and assist the Council in achieving economic and physical regeneration, as envisaged in the Development Plan. In addition, the proposal will:

- Enhance retail choice and diversity and facilitate private investment within the Lucan District Centre;
- Create economic benefits to the economy by creating jobs and other positive spin off benefits in the local area; and
- Demonstrate investor and operator confidence in the local area.

4.0 Assessment of Local Retail Provision

4.1 To assess the effect of new retail floorspace, we have undertaken a review of local retail provision in proximity to the Lucan District Centre. This includes a range of town centres, local centres, and large format retail warehousing facilities. This review confirms that existing retail facilities are well dispersed around the application site.

4.2 Existing convenience facilities allow for both weekly and day-to-day top-up shopping for nearby residents. In quantitative terms, most comparison goods floorspace is provided at the Liffey Valley Major Retail Centre. The Liffey Valley Shopping Centre provides an extensive range of clothing, footwear, and accessories in high quality shopping environment. Liffey Valley Retail Park, and the out-of-centre retail parks in Lucan and Fonthill Road provide a significant quantum of bulky comparison goods.

Lucan Village Centre

4.3 Lucan Village Centre is located 0.9km to the north of the Lucan District Centre. It is defined as a 'Village Centre' in the Urban Hierarchy and as a Level 4 centre in the Retail Hierarchy of the Development Plan. This places it below the Lucan District Centre in the Retail Hierarchy.

4.4 Lucan Village benefits from an existing residential population in the village core and well-established suburban dwellings to the south and east. The population of Lucan Village continues to grow with new residential development to the north of the River Liffey. This includes Laraghcon and Rokeby Park residential developments.

4.5 Lucan Village provides a good mixture of retail, leisure, services, and financial and professional facilities. This floorspace is provided in two principal locations within the Village. Most of the facilities are located around the Lucan Village Park and on Lucan Road. This comprises the Centra store and Post Office; AIB and Bank of Ireland branches; several public houses, restaurants, and cafes; pharmacies and dry cleaners; health surgeries; and a fuel station.

4.6 A second collection of facilities is situated on the north Main Street towards Chapel Hill. This includes financial and professional services; personal services; hot food takeaways; cafes, restaurants, and retail stores and services.

4.7 Lucan Village's convenience offer is anchored by the 270 sq m (gross) Centra store at the junction of Lucan Road and Main Street. This store provides a good selection of fresh fruit and vegetables; fresh and frozen meat, fish, and poultry; ambient food; non-durable household goods for cleaning and maintenance of the home; toiletries; etc. In addition to its convenience goods offer, the Centra store also accommodates a Post Office and Frank & Honest café. Other convenience facilities in Lucan Village include a greengrocer, butcher, fishmonger, newsagents, and service station stores. Lucan Village does not provide a large format supermarket.

4.8 Lucan Village's comparison goods offer includes pharmacies, charity shops, a bicycle store, bridal store, and vaping supplies.

Leixlip Town

4.9 Leixlip is located 3km to north west of the Lucan District Centre. It is defined as a Level 2 Town Centre in both the Kildare County and GDA Retail Hierarchy. The Kildare County Development Plan confirms that its defined 'Core Retail Area' is located along the Main Street and part of Captain's Hill. Leixlip is served by two rail stations at Louisa Bridge and Leixlip Confey.

4.10 Leixlip Town Centre's retail facilities are anchored by the new 940 sq m (gross) Aldi store on the western edge of the Core Retail Area. The store allows for full weekly food shopping to be undertaken in the Town Centre. Other convenience provision includes a Spar store, butchers, bakery, and newsagent. Its comparison goods offer is varied with several independent clothing boutiques, charity shops, DIY and home furnishing stores, and pharmacies. It also provides a good range of financial and profession services, and personal services such as barbers and salons.

4.11 To the north of Leixlip Town Centre is the Riverforest Neighbourhood Shopping Centre. Its convenience offer is anchored by a 1,495 sq m Supervalu store and off-licence, in addition to an independent butchers and newsagent. Finally, to the north west of Leixlip Town Centre is a 1,715 sq m Lidl store in Collinstown / Easton.

Adamstown Centres

4.12 The Adamstown Strategic Development Zone provides for the creation of a new sustainable residential led community to the south of the Lucan District Centre. It is anticipated to accommodate 7,010-8,905 residential units, and 22,500-127,000 sq m of commercial development over its lifetime.

4.13 The SDZ Planning Schemes states that the new residential community should be served by a district centre adjoining the train station and two local centres. One local centre has been constructed on Shackleton Drive, 1.4km to the west of the Lucan District Centre. It provides a 3,620 sq m Lidl store with undercroft car parking and ground floor coffee shop. An additional convenience retail facility is located on Adamstown Avenue, 1.2km to the south of the Lucan District Centre. This Londis store provides a good array of food, drink, and non-durable household goods. It also accommodates a hot-food counter and off-licence.

4.14 Planning permission was granted in 2020, with amendments approved in 2021, for the construction of the new Adamstown District Centre. This will comprise two foodstores providing 7,115 sq m of floorspace (gross) and 20 other retail, café, and restaurant units. In addition, it will include 275 new residential units, a multi storey car park, and extensive public realm.

Liffey Valley Major Retail Centre

4.15 Liffey Valley is located 4km to the east of the Lucan Shopping Centre. It is defined as a Major Retail Centre and Level 2 Retail Centre in the GDA Retail Strategy. It comprises a regional shopping centre and leisure uses, retail park, Tesco superstore, and other large format commercial uses.

4.16 The Shopping Centre provides approximately 80 stores, 20 restaurants, and cinema. It includes approximately 39,000 sq m of comparison goods floorspace with major occupiers including M&S, Penneys, and Dunnes Stores. Planning permission was recently granted by An Bord Pleanála for an extension that will provide 15,000 sq m of additional comparison goods sales floorspace and significant additional leisure floorspace.

4.17 Liffey Valley's convenience goods offer is anchored by the Tesco Extra superstore to the south of the Shopping Centre. Opened in 2018, it provides 7,935 sq m (gross) of floorspace and has an extensive convenience and comparison goods offer.

4.18 Further south is the Liffey Valley Retail Park and B&Q superstore. These provide an extensive range of large format bulky comparison goods. Occupiers of the Retail Park include The Range, Currys PC World, Argos, Harry Corry, and Halfords.

Retail Parks

4.19 The Lucan and Fonthill Road Retail Parks are located is 2km and 3km to the east of the Lucan District Centre respectfully. They are identified as 'Retail Warehousing' zones in the Development Plan but do not form part of the Retail Hierarchy.

4.20 Fonthill Road comprises the purpose-built Fonthill Retail Park and mixed industrial and retail warehouse buildings to the north. Its convenience offer includes Lidl and Aldi foodstores, Dealz, Eurasia supermarket, and Polonez Off Licence. It also has an extensive bulky comparison goods offer with Homebase, EZ Living, and Homestore + More. Other occupiers include Smyths Toys, Power City, and Intersport Elverys.

4.21 The Lucan Retail Park provides four comparison goods units. It is anchored by a Woodies store and garden centre, in addition to DID Electrical, Halfpenny Golf, and TC Mathews. The Lucan Retail Park benefits from good vehicular accessibility and high visibility from the N4.

Local Centres

4.22 The proposal's catchment area also includes several local centres that provide an important shopping function. The largest of these are Hillcrest and Ballyowen Road Local Centres. Both local centres provide supermarkets that allow residents to undertake full weekly or bi-weekly food shops. They are supported by small scale convenience occupiers, retail services, and leisure uses. They are purpose built local centres and benefit from convenient vehicular access and parking arrangements, and adjoining residential population

4.23 Other smaller local centres are well dispersed throughout the proposal's catchment area. These local centres in Finnstown, Dodsborough Road, Foxborough Crescent, Griffeen, and Balgaddy. They are typically anchored by a small convenience store of 200-300 sq m, with some additional nonretail services and leisure uses. The smaller local centres provide an essential service to local catchments for day-to-day convenience shopping requirements.

5.0 Sequential Approach

Introduction

5.1 The Retail Planning Guidelines (April 2012) set out the Government's policies and guidance on new and leisure development. Its *'key messages'* confirm that the development management process must support applications for retail development which:

- Are in line with the role and function of the city or town in the settlement hierarchy of the relevant development plan; and
- Accord with the scale and type of retailing identified for that location in the development plan and relevant retail strategy.

5.2 In accordance with Section 4.2 of the Retail Planning Guidelines, the applicant requested a pre-planning consultation meeting with the Planning Authority. This allowed for pro-active engagement and identification of the relevant policy tests to assess the proposed development. The analysis undertaken in this Retail Statement has been influenced by the feedback received from the Planning Authority.

Consistency with the Development Plan Framework

5.3 Section 4.3 of the Retail Planning Guidelines confirms that the location of retail development should be guided by polices, guidelines, and retail strategies for an area. New retail development should be appropriate to its location and its position within the established hierarchy of centres. Below we provide confirmation that the proposal is consistent with hierarchy established in the national, regional, and local planning policy and strategies.

National Planning Framework

5.4 The National Planning Framework (February 2018) (NPF) is the Government's high-level strategic plan for shaping growth and development of the country in the period to 2040. It is situated at the highest point of the Irish planning hierarchy and informs the preparation of regional and local planning policies.

5.5 The NPF has an aim to make urban places stronger. The National Strategic Outcomes (Chapter 1) and National Policy Objectives in Chapter 2 set out a framework for making places more attractive for more people as places to choose to live and visit by 2040.

5.6 Part of this strategy includes supporting future growth and success of Dublin and its surrounding suburban areas. It is important that Dublin's growth is managed as well as suburban areas to ensure it can accommodate an increasing resident population and provide economic development opportunities. The following policy objectives further emphasise the NPF commitment to this:

- **National Policy Objective 6 -** Regenerate and rejuvenate urban areas that can accommodate changing roles and functions in order to sustainably influence and support their surrounding area;

- **National Policy Objective 11 -** Presumption in favour of development that creates more jobs and commercial activity in existing urban areas; and

- **National Policy Objective 64:** Improving air quality through integrated land use and spatial planning that supports public transport, walking and cycling as preferred modes of transport.

Regional Planning Policy

5.7 The Regional Spatial and Economic Strategy for the Eastern and Midland Region came into effect June 2019 and sets out Regional Policy Objectives up to 2031. One of the key principles of this strategy is Economic Opportunity that promotes creating the right conditions and opportunities to realise sustainable economic growth and jobs that ensure a good living standard for all.

5.8 Section 6.5 of the RSES confirms that the retail sector is a significant employer and economic contributor to the Region. In addition, retail plays a key role in placemaking and creating liveable environments. Regional Policy Objective 6.11 states that *'future provision of significant retail development within the Region shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012 and the retail hierarchy for the Region'*.

5.9 Table 6.1 of the RSES sets out the Retail Hierarchy confirms that Lucan is defined as a 'Level 3 District Centre'. This is in addition to other nearby District Centres in South Dublin County Council including Adamstown and Clondalkin. Below these in the retail hierarchy are Level 4 Neighbourhood Centres and Level 5 Corner Shops / Small Villages.

5.10 The Dublin Metropolitan Area Strategic Plan (MASP) forms part of the RSES. It is an integrated land use and transportation strategy for the Dublin Metropolitan Area. It identifies several Guiding Principles to assist with the sustainable development of the Dublin, with the following of relevance to the proposal:

- **Compact Sustainable Growth:** Consolidated growth of the Metropolitan Area, including brownfield and infill development with improved local services

- **Integrated Transport and Land Use:** Focus growth along existing and proposed transportation corridors to reduce the reliance on private modes of transport

- **Increased Employment Densities:** Focusing employment growth in sustainable locations along transport corridors.

Retail Strategy for the Greater Dublin Area

5.11 The Retail Strategy for the Greater Dublin Area was prepared to guide the activities and policies for retail planning across all councils. It highlights the planning system's key role in facilitating and promoting sustainable patterns of development. This includes the need for vital and viable town centres to service the needs of surrounding developed areas. Vitality and viability of town centres should be promoted by:

- Planning for the growth and development of existing centres
- Promoting and enhancing existing centres, by focusing development in such centres and encouraging a wide range of services in good environments which are accessible to all
- Enhancing consumer choice by making provision for a range of shopping, leisure, and local services
- Supporting high quality, well designed efficient, competitive, and innovative retail in town centres
- Ensuring that new development is accessible and well served by a choice of means of transport and where possible within walking distance.

5.12 The Retail Strategy for the GDA identifies Lucan as a Level 3 District Centre. It also states that 'District Centres' usually comprise groups of shops often containing at least one supermarket and a range of non-retail services. Mirroring the Retail Planning Guidelines, the Retail Strategy states that District Centres should provide between 10,000 sq m net and 20,000 sq m net of floorspace.

5.13 In respect of South Dublin County Council specifically, the Retail Strategy seeks to:

> *'develop and consolidate a hierarchy of high quality, vibrant urban centres, supported by the development of a strong retailing sector that serves to enhance and develop the urban fabric of existing and developing centres in accordance with the principles of good urban design and sustainable development.'*

South Dublin Development Plan (2016-2022)

5.14 Table 5.1 of the Development Plan confirms that Lucan Shopping Centre is a District Centre within the retail hierarchy South Dublin. Lucan Village is defined below this in the hierarchy as a Level 4 centre. Urban Centres Policy 4 'District Centres' of the Development Plan states that:

> *'it is the policy of the Council to encourage the provision of an appropriate mix, range and type of uses in District Centres, including retail, community, recreational, medical and childcare uses, at a scale that caters predominantly for a district level catchment, subject to the protection of the residential amenities of the surrounding area.'*

5.15 Other key Development Plan policies and objectives of relevance to the consideration of the sequential approach are as follows:

- **UC4 Objective 1:** To support the revitalisation of district centres.
- **UC4 Objective 2:** To support the development of small-scale community facilities within accessible district centres.

- **UC4 Objective 3:** To encourage a broad range of facilities and services that are appropriate to serve a district catchment and fulfil a district function
- **Retail Policy 1 Overarching:** Ensure adequate retail provision at suitable locations in the County and protect the vitality and viability of existing centres.
- **R1 Objective 3:** To direct new retail floorspace in to designated retail centres.
- **R1 Objective 4:** To support the vitality and viability of existing retail centres.
- **R2 Objective 1:** To consolidate the existing retail centres in the County and promote town, village, district centre and local centre vitality and viability through the application of a sequential approach to retail development.
- **R2 Objective 2:** To direct new major retail floorspace in the County to designated centres of the appropriate level and the identified Retail Opportunity Sites, and to further direct retail development in designated centres into the Core Retail Areas and restrict retail development outside of the Core Retail Area to an appropriate level and form of retail development.
- **Retail Policy 6 'District Centres':** Maintain and enhance the retailing function of District Centres (Level 3 & Level 4).
- **R6 Objective 1:** To promote the development of District Centres as sustainable, multifaceted, retail led mixed use centres.
- **R6 Objective 2: To** ensure that the scale and type of retail offer in District Centres is sufficient to serve a district catchment, without adversely impacting on or drawing trade from higher order retail centres.

Sequential Review

5.16 The methodology in the application of the sequential approach is consistent across the Retail Planning Guidelines, RSES, Retail Strategy for the GDA, and the SDCC Development Plan. Principally, the Retail Planning Guidelines state that:

> *'Where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional retail impact studies* ***are not required.****' (Government Emphasis)*

5.17 As detailed previously in this section, the application site is a defined 'District Centre' in the retail hierarchy of the RSES, Retail Strategy for the GDA, and SDCC Development Plan. Policies contained in these documents confirm that new retail floorspace should be directed to existing defined and accessible town centres like Lucan.

5.18 The proposed development is also at a scale suitable to the Lucan's position in the established Retail Hierarchy. The Retail Strategy for the GDA states that District Centres should provide between 10,000 sq m net and 20,000 sq m net of floorspace. The existing Lucan District Centre provides 12,192 sqm sq m of retail, leisure, and other floorspace. Accordingly, there is ample scope to increase its offering while not altering its position within the Retail Hierarchy.

5.19 Furthermore, the SDCC Development Plan Retail Policy 2 'Sequential Approach' confirms that it is the policy of the Council to guide retail development to existing town, major retail, village, and district centres to sustain their vitality and viability. In accordance with Retail Policy 2 Objectives 1 and 2, the application directs new retail investment and facilities to a highly accessible existing district centre. It will provide a wider range of retail facilities in easy walking distance of existing residential communities.

5.20 It follows that the proposal is fully compliant with the sequential test.

Summary and Conclusion

5.21 This section confirms that the application accords with national, regional, and local planning policy framework. It is consistent with the scale and role of Lucan District Centre in the established Retail Hierarchy for South Dublin and the wider GDA. Accordingly, the application meets the requirements of the sequential approach.

6.0 Retail Impact Assessment

Introduction

6.1 As detailed in Section 5, the application site forms part of the Lucan District Centre. The District Centre is established in the Retail Hierarchy of the SDCC Development Plan and Retail Strategy for the GDA. Policies contained in national, regional, and local planning policy directs new retail investment to existing defined and highly accessible District Centre.

6.2 Furthermore, the scale of proposed retail floorspace is appropriate to Lucan District Centre's position in the Retail Hierarchy. The Retail Strategy for the GDA states that District Centres typically comprise groups of shops often containing at least one supermarket and a range of non-retail services. In addition, it confirms that District Centres should provide between 10,000 sq m net and 20,000 sq m net of floorspace. The existing Lucan District Centre provides 12,192 sqm of retail, leisure, and other floorspace. Accordingly, there is ample scope to increase its offering while not altering its position within the Retail Hierarchy.

6.3 The National Retail Planning Guidelines state that:

> *'Where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional <u>retail impact studies</u> **are not required**.' (<u>Applicant</u> & **Government** Emphasis)*

6.4 It follows that there is no formal requirement to assessment the retail impact of the proposed development. Irrespective of this, to ensure the Local Authority has all the information required to consider the application, we have undertaken an assessment in accordance with national and regional methodology.

6.5 It is also important to note that the proposal will also deliver significant positive impacts. This will include enhancement in the retail facilities available to local residents. It will make more efficient use of brownfield land in a location highly accessible by a range of sustainable modes of transport including walking, cycling, and public transport. In addition, it will make the Lucan District Centre more resilient to competition to out-of-centre retail destinations.

Methodology

6.6 The established methodology for assessing retail impact is set out in Annex 5 of the National Retail Planning Guidelines. These are:

1. Identification of catchment or study area;
2. Estimation of expenditure available within the defined catchment or study area;

3. Estimation of the turnover of existing centres within the catchment area which is likely to be affected by a new development;
4. Estimation of the turnover of the new development for which a planning application is being lodged; and
5. Estimation of the quantum of consumer retail spending available in the catchment area which will be diverted from existing centres to the new retail development.

6.7 In considering applications for retail development, the Retail Planning Guidelines emphasise that:

> *'the assessment of retail impact **is not intended to prevent competition** or prevent trade diversion in itself, but **its purpose is to promote healthy urban centres** in the public interest. This must be borne in mind when carrying out these assessments.' (Our Emphasis)*

Establishing the Catchment Area

6.8 The catchment area for the proposed retail floorspace is estimated to comprise a seven-minute drivetime from the Lucan District Centre. The extent of this catchment is detailed in Figure 2 below and in more detail at **Appendix 1**.

Figure 2: Catchment of the Proposal

Notes: See **Appendix 1** for Detailed Catchment Plan

6.9 A seven-minute drivetime has been chosen for the following reasons. Firstly, the proposed development will not create a new standalone retail destination. It is an extension to an existing District Centre that already provides large format convenience and comparison operations. The Lucan District Centre forms part of the established convenience and comparison shopping patterns of the area. Given the scale of the proposed additional floorspace, it would not result in a 'step change' in the trading patterns of the Lucan District Centre. It follows that the catchment of the proposed development is likely to align with the existing catchment of the District Centre.

6.10 The latest survey derived market share and trading data for Dublin is provided in the Retail Strategy for the Great Dublin Area (2008-2016). The Retail Strategy splits the GDA in to 28 zones, with the Lucan District Centre sitting in Zone 9. The survey data confirms that the Lucan District Centre has the highest convenience market share of any retail destination in Zone 9[1]. It generates almost 90% of its turnover from Zone 9. Similarly, most of its comparison goods turnover is derived from Zone 9[2].

6.11 Figures 3 and 4 below confirm that Zone 9 of the GDA Retail Strategy incorporates the South Dublin Local Electoral Areas of Lucan, Palmerstown – Fonthill, and approximately 70% of the Clondalkin LEA. The anticipated catchment of the proposal sits within Zone 9.

Figure 3: GDA Retail Strategy Survey Zones

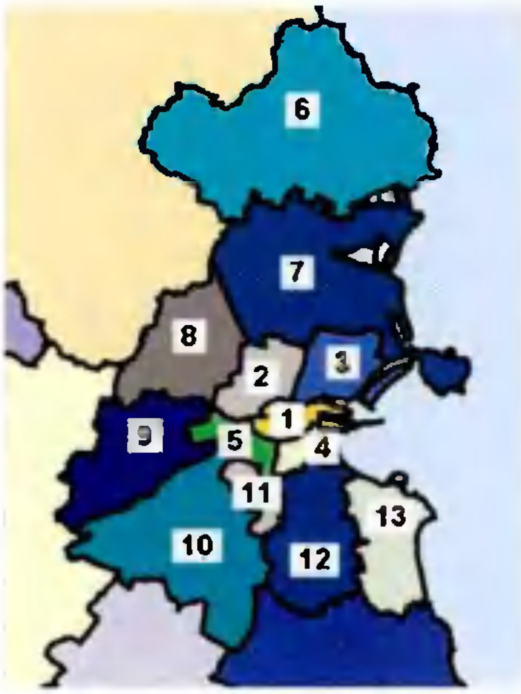


Figure 4: SDCC Local Electoral Areas

6.12 Secondly, there are various competing shopping destinations with comparable convenience and comparison offers. This includes Clondalkin, Palmerstown, Celbridge, and Maynooth. The catchment of these centres, in addition to Liffey Valley, will overlap partly with Lucan District Centre's catchment ensuring that it will not draw significantly beyond a seven-minute drivetime. Again, this aligns with the survey data provided in the GDA Retail Strategy that confirms the Lucan District Centre's convenience and comparison market share reduces beyond Zone 9.

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[1] See Table 3 Convenience Goods Centre Market Shares of Appendix 3e of the Retail Strategy for the GDA

[2] See Table 1 Non-Bulky Comparison Goods Centre Market Shares of Appendix 3e of the Retail Strategy for the GDA

Estimation of Expenditure Available Within the Defined Catchment or Study Area

6.13 Following the establishment of the catchment area for the proposal, an assessment of the available expenditure must be undertaken. Data provided by the ESRI confirms that catchment had a population of 62,701 in 2019.

6.14 In projecting the catchment population to the current year (2021) and the design year (2026), we have considered two outcomes based on the CSO data. The CSO's Regional Population Projections 2017-2036 statistical release provides six scenarios for potential population growth in Dublin in the period to 2036. These six scenarios are split by two migration assumptions for Dublin as follows:

1. **Dublin Outflow:** 2016 internal migration flows of -4,400 per annum from Dublin to other regions reverting to the 2006 pattern of -10,200 outflows from Dublin annually by 2021 and remaining constant thereafter.
2. **Dublin Inflow:** 2016 internal migration flows of -4,400 per annum from Dublin reverting to a traditional 1996 pattern of +2,100 inflows from other regions to Dublin per annum by 2021 and remaining constant thereafter.

6.15 We have adopted the M2F2 (moderate migration) assumptions under the 'Dublin Outflow' and 'Dublin Inflow' for balance[3]. These equate to a population growth rate per annum of 0.6% and 1.4% respectfully. Table 1 below applies these growth rates to the 2021 population[4] and shows that the catchment population will grow by between 1,927 and 4,621 in the period to 2026.

Table 1: Catchment Population Projections

	2021 Population	2026 Population	Population Change
M2F2 Dublin Outflow (0.6% growth pa)	63,456	65,382	+1,927
M2F2 Dublin Inflow (1.4% growth pa)	64,469	69,110	+4,641

6.16 While we have considered both population scenarios to assess the future available expenditure, we believe that 1.4% annual population growth is more realistic. The catchment area is experiencing significant population growth through the ongoing residential construction at Adamstown. Developer Quintain recently announced it will deliver over 700 new homes at Adamstown in the next two years[5]. In addition, planning permission has been granted for the new Adamstown District Centre that will add a further 275 residential units. Based on the average household size in Ireland of 2.75[6], these schemes alone will provide

[3] See Tables 2.3 and 2.4 of CSO Regional Population Projections 2017-2036 (June 2019)

[4] Corresponding growth rates applied to 2019 population of 62,701 to provide 2021 population

[5] https://quintain.ie/2021/03/23/quintain-to-deliver-over-700-new-homes-in-adamstown/

[6] CSO Census of Population 2016

accommodation for 2,681 persons. Added with normal migration and other residential construction, we believe a population growth rate per annum of 1.4% is more likely.

6.17 We have reviewed the available data sources for local per capita expenditure levels. The GDA Retail Strategy provides estimates within its respective survey zones; however, these were prepared 13 years ago and may no longer be robust. To identify more recent data, we have reviewed planning applications for major retail floorspace in the local area. Major applications for convenience and comparison floorspace at Liffey Valley have been assessed by both the Planning Authority and An Bord Pleanála. The expenditure assumptions in the Retail Impact Statements were considered robust and provide a useful basis to assess local expenditure levels.

6.18 The Retail Impact Statement for the Tesco store in Liffey Valley assumed a convenience per capita expenditure of €3,415 at 2015[7]. We have adopted this convenience expenditure for 2021 to ensure there is no overestimation of local expenditure. In addition, by applying no further growth in the period to 2021, we can account for the continued growth in special forms of trading in convenience goods sales. From 2021, we have applied modest convenience expenditure growth per annum of 1.0% to 2026.

6.19 Table 2 below confirms that the catchment area population will grow by between 1,927 and 4,641 persons between 2021 and 2026. When the new population's expenditure is combined with the growth in expenditure of existing residents, it generates between **€18.0m** and **€27.9m** of additional convenience expenditure in the period to 2026.

Table 2: Available Convenience Expenditure

0.6% Pop Growth	2021	2026	Change
Catchment Population	63,456	65,382	1,927
Per Capita Convenience Expenditure	3,415	3,589	-
Total Available Expenditure (€m)	**216.7**	**234.7**	**18.0**
1.4% Pop Growth			
Catchment Population	64,469	69,110	4,641
Per Capita Convenience Expenditure	3,415	3,589	-
Total Available Expenditure (€m)	**220.2**	**248.0**	**27.9**

6.20 For comparison goods expenditure, we have adopted the 2021 per capita figure of €4,147 contained in the Retail Impact Statement for the Liffey Valley extension[8]. We have applied a modest comparison goods expenditure growth of 3.5% per annum. Table 3 below confirms that that the available comparison goods expenditure in the catchment area will increase by between **€51.2m** and **€64.9m** in the period 2026.

[7] See Table 7.3 of Tesco Retail Impact Statement (PP Ref: SD12A/0014). Store opened in 2018

[8] See Table 5.1 of GVA Retail Impact Statement dated January 2016

Table 3: Available Comparison Expenditure

0.6% Pop Growth	2021	2026	Change
Catchment Population	63,456	65,382	1,927
Per Capita Comparison Expenditure	4,147	4,807	-
Total Available Expenditure (€m)	**263.1**	**314.3**	**51.2**
1.4% Pop Growth			
Catchment Population	64,469	69,110	4,641
Per Capita Comparison Expenditure	4,147	4,807	-
Total Available Expenditure (€m)	**267.3**	**332.2**	**64.9**

6.21 These expenditure levels have been applied to existing and planned retail facilities serving the catchment area below.

Estimation of the Turnover of Existing Centres within the Catchment Area

6.22 We estimate that there is 20,783 sq m of existing net convenience sales floorspace[9] within the catchment area. As detailed in **Table 4** below, this equates to a convenience goods turnover of €249.40m at 2021, rising to €255.70m at 2026. This turnover is less than the available convenience goods expenditure in the catchment area.

6.23 In addition, there is a further 12,460 sq m of existing net convenience sales floorspace in centres outside the catchment that will partly serve residents within the catchment. Combined, the in-catchment and out-of-catchment floorspace has a benchmark turnover of €398.92m in 2021, rising to €408.99m in 2026[10].

6.24 While this total benchmark turnover exceeds the available expenditure in the catchment, it is important to note that these stores will not rely solely on expenditure within the catchment. In particular, the stores outside a seven-minute drivetime will only partially draw expenditure from the catchment area. Table 4 provides this context by estimating the amount of each store's turnover is likely derived from the catchment area.

6.25 Centres such as Clondalkin and Celbridge will draw most of their turnover from residents that are located outside the proposal's catchment area. It is likely that 10-20% of the turnover of stores in Celbridge and Clondalkin is derived from residents within the proposal's catchment area.

6.26 Lucan District Centre, Lucan Village Centre, Adamstown's retail facilities, and the local centres will receive most of their turnover from residents in the catchment area. This is likely to comprise up to 90% of each store's turnover.

6.27 Convenience floorspace in Liffey Valley and at the Fonthill Road Retail Park is located on the edge of the catchment and is less reliant on the proposal's catchment. The Retail Impact Statement for the Tesco in

[9] Excludes non-sales space such as storage, customer entrance, café space, etc

[10] Based on a benchmark sales density of €12,000psm at 2021

Liffey Valley estimates its primary catchment is comprising a fifteen-minute drive from Liffey. This partly includes the proposal's catchment but also areas to the east, west, and south. Accordingly, we have assumed that 35% of the Liffey Valley convenience turnover is derived from the proposal's catchment area.

Table 4: Convenience Benchmark Turnover

Store	Net Convenience Sales Area (sq.m)	Sales Density (€/sq.m) 2021	Convenience Turnover €m 2021	Convenience Turnover €m 2026	% Turnover Derived from Catchment Area	Turnover Derived from Catchment Area €m 2021	Turnover Derived from Catchment Area €m 2026
STORES WITHIN CATCHMENT							
Lucan District Centre	3,0[illegible]	12,000	36.28	37.19	80-90%	29.24	29.98
Lucan Village Centre	592	12,000	7.10	7.28	90%	6.39	6.55
Leixlip	3,048	12,000	36.58	37.50	50%	20.57	21.09
Liffey Valley Major Centre	4,170	12,000	50.04	51.30	35%	17.51	17.96
Fonthill Road Retail Park	3,405	12,000	40.86	41.89	35%	14.30	14.66
Adamstown - Existing Centres	1,513	12,000	18.15	18.61	70-90%	13.09	13.42
Local Centres	5,032	12,000	60.39	61.91	40-90%	46.48	47.65
Subtotal	**20,783**	-	**249.40**	**255.70**		**147.58**	**151.31**
STORES OUTSIDE CATCHMENT							
Celbridge	6,085	12,000	73.02	74.86	10%	7.30	7.49
Clondalkin	4,932	12,000	59.18	60.68	20%	11.84	12.14
Local Centres	1,443	12,000	17.32	17.76	10-30%	3.53	3.62
Subtotal	**12,460**	-	**149.52**	**153.30**		**22.67**	**23.24**
TOTAL	**33,243**		**398.92**	**408.99**		**170.25**	**174.55**

Notes: Net convenience sales area is adjusted from gross floorspace. It excludes non sales floorspace and floorspace used for the sale of non-convenience goods.

6.28 As detailed above, the benchmark convenience turnover of existing stores in the catchment is less than the available convenience goods expenditure. Even accounting for further leakage of this expenditure to centres outside the catchment (e.g. Maynooth, Tallaght, Palmerstown), clearly the centres within the catchment are trading at very healthy levels. This can be partially accounted for by the growth in residential population in Adamstown in the past 10-15 years.

6.29 The new Adamstown District Centre will incorporate two new supermarkets to serve its growing population. This will comprise 4,194 sq m of additional supermarket sales floorspace, in addition to other ancillary / supporting uses[11]. Our assessment clearly demonstrates that there is sufficient expenditure to support these new Adamstown supermarkets, and the modest amount of new convenience goods sales floorspace at Lucan District Centre (345 sq m).

[11] Source: Table 4 of Planning Application Report (Ref: SDZ20A/0018)

6.30 Table 5 below provides an estimate of the comparison goods turnover of floorspace within or on the edge of the catchment area. The floorspace and sales density figures are derived from the Retail Impact Statement for the recently approved Liffey Valley Plaza extension (Ref: SD20A/0089). This proposal was approved by both the Planning Authority and An Bord Pleanála. Accordingly, the assumptions are robust for the purposes of this retail assessment.

6.31 This analysis confirms that by 2026, the local comparison goods floorspace will have a turnover of approximately €667m. 70% of this comparison goods turnover is generated by the existing and approved floorspace at Liffey Valley.

Table 5: Comparison Benchmark Turnover

Centre	Net Comparison Floorspace (sq.m)	Sales Density (€/sq.m)	Comparison Turnover €m	
		2021	2021	2026
Maynooth / Leixlip / Celbridge	19,301	6,182	119.32	125.41
Clondalkin	7,017	6,182	43.38	45.59
Liffey Valley Existing	38,929	8,243	320.88	337.24
Liffey Valley Plaza (Extant)	14,999	8,243	123.63	129.94
Lucan	4,457	6,182	27.55	28.96
Subtotal	**84,703**	**-**	**634.76**	**667.14**

Estimation of the Turnover of the New Development

6.32 It is anticipated that Unit 1 will be occupied by a national discount variety operator. The operator will use the floorspace for the sale of its convenience and comparison goods offer. The product will principally comprise the sale of:

- Food and non-alcoholic drink
- Non-durable household goods: These comprise cleaning and maintenance products for the home including soaps, washing liquids and powders, and disinfectants; articles for cleaning such as brushes, tea towels, and sponges; kitchen and bathroom paper, tablecloths, vacuum bags, and bin liners; clothes pegs and hangers; shoe cleaning products, etc.
- Health and beauty products: Haircare, beauty and skincare, dental supplies, and make up
- Home furnishings
- Electronic accessories for the car and home
- Pet food and products
- Stationery and crafts
- DIY and gardening products
- Clothing, footwear, and accessories

6.33 To estimate the turnover of the proposal, we have adopted the sales density and turnover efficiency assumptions in the GDA Retail Strategy. To demonstrate that the proposal is acceptable, we have not applied any reduction in sales density to reflect the 'discount' nature of the operator. The sales densities and turnover efficiency rates are in accordance with assumptions used to assessment nearby retail planning applications. Accordingly, they are robust for the purposes of assessing the proposal.

Table 6: Turnover of Proposal

Type of Retail Goods	Floorspace sq. m			Sales Density €/sq. m	Turnover €m	
	Gross	Net Sales Area	Net Sales Area by Goods	2021	2021	2026
Convenience Goods			345	12,000	4.14	4.24
Comparison Goods	1,057	690	345	8,000	2.76	2.90
Total			**690**	**-**	**6.90**	**7.15**

6.34 It is estimated that the proposal will have convenience goods turnover of €4.14m at 2021, rising to €4.24m at 2026. This equates to just 1.7% of the turnover of the convenience stores within the catchment at 2026. Furthermore, there will be up to €27.9m of additional convenience goods expenditure in the catchment area by 2026. It follows that there will be more than adequate new expenditure to support the proposal and the approved foodstores at the Adamstown District Centre.

6.35 The comparison goods turnover of the proposal is estimated to be €2.76m at 2021, rising to €2.90m at 2026. This equates to just 0.4% of the comparison goods turnover of the surrounding area outlined in Table 6 above. Furthermore, there will be up to €64.9m of additional comparison goods expenditure in the catchment area by 2026 to support new floorspace and improvements to existing floorspace. It follows that the scale of new comparison goods turnover at the Lucan District Centre is clearly *de minimis*.

Trade Diversion and Impact Assessment

6.36 Table 7 provides an estimate of convenience goods trade diversion and impact on existing and extant convenience floorspace. It assumes that 75% of the proposal's turnover is diverted from existing and extant stores within the catchment area. The remaining trade diversion will be experienced by retail destinations outside the catchment.

6.37 The analysis in Table 7 confirms that the levels of convenience impact are not significant and are all below 3%. When considering these retail impact figures, it is important to note that:

- The SDCC Core Strategy notes that population growth will result in a *'significant increase in retail expenditure and require additional floor space to accommodate the needs of the future population. This is likely to be coupled with increased spending power across the population, due to improved* *economic conditions'*[12]. District Centres and other locations within the retail hierarchy are the appropriate location for this new retail floorspace.

- The retail impact figures do not fully account for the increase in local expenditure levels. This increase in expenditure levels will assist in offsetting the trade diversion to the proposal.
- The local area will continue to experience above average population growth through the build out of Adamstown. This will result in significant increases in local expenditure and a need to proposed retail floorspace to meet the needs of residents.
- The assessment of impact is based on benchmark turnovers utilising a sales density of €12,000psm. The analysis contained in Table 2 confirms that the quantum of available expenditure in the local area significant exceeds the benchmark turnover of the centres. As the convenience goods turnover of these centres is likely to be higher, the corresponding impact would be lower.
- The assessment of impact only considers the convenience goods turnover of the centres. When the comparison goods turnover of the centres is added, the overall retail impact would be lower.

6.38 The highest level of trade diversion from a single location is estimated to be on the Fonthill Road Retail Park. It is an established principle in retail planning that 'like affects like'. The Fonthill Road Retail Park provides two discount foodstores and critically, a large format discount variety operator selling food and drink. The availability of a discount variety operator selling food and drink at the Lucan District Centre will reduce the requirement for local residents to travel to Fonthill Road.

6.39 The proposal will divert some of its turnover from the existing convenience operators in the Lucan District Centre. In overall terms however, the proposal will result in an increase in the convenience goods turnover of the Lucan District Centre. It will provide additional choice and diversity for customers that visit Lucan District Centre. This increase in turnover will also make the District Centre more resilient to impact from out-of-centre retail proposals.

6.40 It is important to note that that the impact figures in Table 7 below relate to the convenience goods turnover of these centres only. The turnover of most centres is generated from the sale of convenience goods, comparison goods, services, leisure uses, and other services. Accordingly, the impact on their centres' overall turnover will be significantly less in many instances

[12] Insert para reference from Dev Plan

Table 7: Convenience Goods Impact

Store	Net Convenience Sales Area (sq.m)	Sales Density (€/sq.m) 2021	Convenience Turnover €m 2021	Convenience Turnover €m 2026	Trade Diversion 2026 %	Trade Diversion 2026 € (€4.24m)	Retail Impact 2026
STORES WITHIN CATCHMENT							
Lucan District Centre	3,023	12,000	36.28	37.19	10%	0.42	1.14%
Lucan Village Centre	592	12,000	7.10	7.28	5%	0.21	2.91%
Leixlip	3,048	12,000	36.58	37.50	5%	0.21	0.57%
Liffey Valley Major Retail Centre	4,170	12,000	50.04	51.30	10%	0.42	0.83%
Fonthill Road Retail Park	3,405	12,000	40.86	41.89	15%	0.64	1.52%
Adamstown - Existing Centres	1,513	12,000	18.15	18.61	5%	0.21	1.14%
Adamstown - Extant District Centre	3,355	12,000	40.26	41.28	10%	0.42	1.03%
Local Centres	5,032	12,000	60.39	61.91	15%	0.64	1.03%
Subtotal	**20,783**	**-**	**249.40**	**255.70**	**75%**	**3.18**	**-**
STORES OUTSIDE CATCHMENT							
Celbridge	6,085	12,000	73.02	74.86	7%	0.30	0.40%
Clondalkin	4,932	12,000	59.18	60.68	5%	0.21	0.35%
Local Centres	1,443	12,000	17.32	17.76	3%	0.13	0.72%
Subtotal	12,460	-	149.52	153.30	15%	0.64	-
Other	-	-	-	-	10%	0.42	-
TOTAL	**33,243**	**0**	**398.92**	**408.99**	**100%**	**4.24**	**-**

Notes: Convenience sales efficiency 0 5% per annum

We have assumed 80% of the Adamstown foodstores' net sales area would be for convenience goods equating to 3,355 sq m

6.41 As stated previously, comparison goods turnover of the proposal is estimated to be €2.76m at 2021, rising to €2.90m at 2026. This equates to just 0.4% of the comparison goods turnover of the surrounding area outlined in Table 8 below. Furthermore, there will be up to €64.9m of additional comparison goods expenditure in the catchment area by 2026 to support new floorspace and improvements to existing floorspace. It follows that the scale of new comparison goods turnover at the Lucan District Centre is clearly *de minimis* and does not warrant an assessment of impact.

Table 8: Comparison Benchmark Turnover

Centre	Net Comparison Floorspace (sq.m)	Sales Density (€/sq.m)	Comparison Turnover €m	
		2021	2021	2026
Maynooth / Leixlip / Celbridge	19,301	6,182	119.32	125.41
Clondalkin	7,017	6,182	43.38	45.59
Liffey Valley Existing	38,929	8,243	320.88	337.24
Liffey Valley Plaza (Extant)	14,999	8,243	123.63	129.94
Lucan	4,457	6,182	27.55	28.96
Subtotal	**84,703**	**-**	**634.76**	**667.14**

6.42 While it has been demonstrated that the proposal does not give rise to any material concern in respect of retail impact, there are several positive impacts that must also be considered. The proposal is a positive sign of investor confidence in the local area. One of the indicators that retailers consider when searching for new store locations is the number of existing national multiples present in the local area. The proposed development could attract additional requirements for floorspace and assist the Council in achieving economic and physical regeneration, as envisaged in the Development Plan. In addition, the proposal will:

- Enhance retail choice and diversity and facilitate private investment within the Lucan District Centre;
- Create economic benefits to the economy by creating jobs and other positive spin off benefits in the local area; and
- Demonstrate investor and operator confidence in the local area.

7.0 Summary and Conclusions

7.1 The Lucan Shopping Centre is a defined 'District Centre' in the Regional and Local Retail Hierarchy. Planning policy confirms that new retail floorspace should be directed to existing defined and accessible town centres like Lucan.

7.2 The proposed development is at a scale suitable to the Lucan's position in the established Retail Hierarchy. The Retail Strategy for the GDA states that District Centres should provide between 10,000 sq m net and 20,000 sq m net of floorspace. The existing Lucan District Centre provides 12,192 sq m of retail, leisure, and other floorspace. Accordingly, there is ample scope to increase its offering while not altering its position within the Retail Hierarchy.

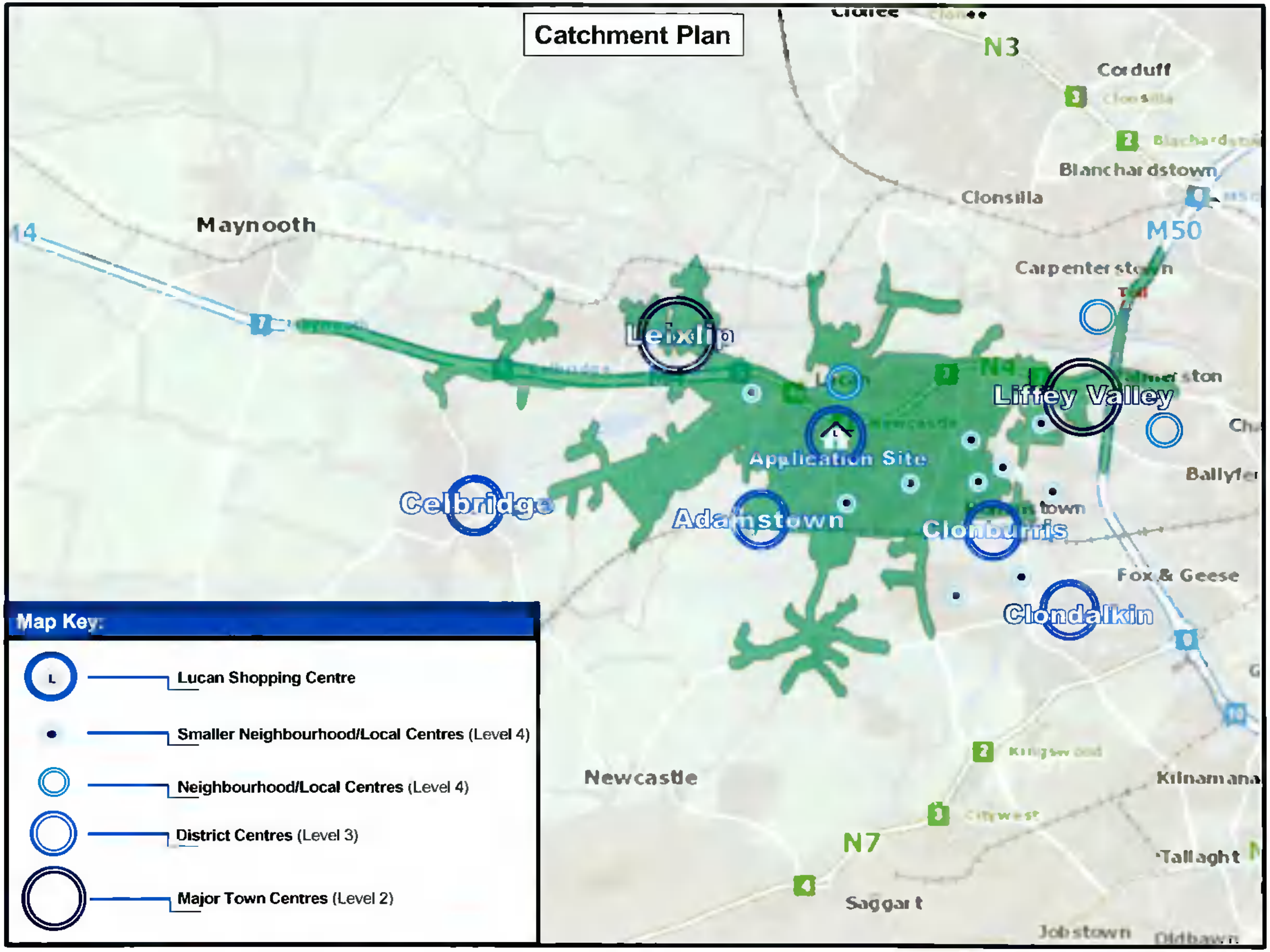
7.3 It follows that there is no formal requirement to assess alternative sequential locations or consider the retail impact of the proposal. Irrespective of this, to ensure the Local Authority has all the information required to consider the application, we have prepared this comprehensive Retail Statement. It demonstrates that the proposal passes the sequential test and does not give rise to any material concern in respect of retail impact.

7.4 Conversely, there are several positive impacts that must also be considered. The proposal is a positive sign of investor confidence in the local area. One of the indicators that retailers consider when searching for new store locations is the number of existing national multiples present in the local area. The proposed development could attract additional requirements for floorspace and assist the Council in achieving economic and physical regeneration, as envisaged in the Development Plan. In addition, the proposal will:

- Enhance retail choice and diversity and facilitate private investment within the Lucan District Centre;
- Create economic benefits to the economy by creating jobs and other positive spin off benefits in the local area; and
- Demonstrate investor and operator confidence in the local area.

7.5 Accordingly, we respectfully request that planning permission is granted for the proposed development.

Appendix 1 – Catchment Plan


Catchment Plan
N3
Corduff
Blanchardstown
Clonsilla
M50
Carpenterstown
Maynooth
Leixlip
Lucan
Liffey Valley
Application Site
Celbridge
Adamstown
Clonburris
Fox & Geese
Clondalkin
Newcastle
N7
Kilnamanagh
Tallaght
Saggart
Jobstown
Map Key:
Lucan Shopping Centre
Smaller Neighbourhood/Local Centres (Level 4)
Neighbourhood/Local Centres (Level 4)
District Centres (Level 3)
Major Town Centres (Level 2)