



Your Ref: SD21A/0161

26th July 2021Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24
D24 A3XC

Dear Sir/Madam,

RE: Two-storey commercial building providing two new units and ancillary accommodation (1,574sq.m gross floor area); Unit 1 will be used as a shop (1,057sq.m), Unit 2 will be used for professional services or health centre or office or gymnasium (517sq.m); the development will also consist of roof plant and PV panels; Lucan advertising signage (50sq.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 (30sq.m); hard and soft landscaping, and pedestrian canopy; connection to services; all associated site and development works – Lucan Shopping Centre, Newcastle Road, Co. Dublin.

South Dublin County Council Reg. Ref. SD21A/0161

We, Avison Young, on behalf of our Client, Tesco Ireland Limited, Gresham House, Marine Road, Dun Laoghaire, Co. Dublin wish to make an observation on the proposed development on a site at the Lucan Shopping Centre, Newcastle Road, Co. Dublin (Planning Application Reg. Ref. No. SD21A/0161). Please note that a payment of €20, the appropriate fee for making a submission, has been made to South Dublin County Council on 26th July 2021, by phone as advised (receipt attached to email as advised). Please note that all correspondence in relation to the observation should be sent to the Agents, Avison Young, 4th Floor, 2-4 Merrion Row, Dublin 2. We would request that the Local Authority keep us informed of any decisions relating to this application.

Whilst our Client welcomes investment in Lucan, there are concerns that the redevelopment proposal in this instance is not aligned with the objectives of local and national planning policy and could be contrary to the proper planning and sustainable development of Lucan. Our Client's concerns in this regard can be summarised as follows:

1. The proposal for a new shop unit (Unit 1) represents an over-provision of retail use at this site which is zoned 'District Centre', which seeks to provide a mix of retail, community, recreational, medical and childcare uses, subject to the protection of the residential amenities of the surrounding catchment area.

2. The proposed design is misaligned with key objectives of the Retail Planning Guidelines 2012, Retail Design Manual 2012 and South Dublin County Development Plan 2016 – 2022.
3. The proposal fails to satisfactorily demonstrate that it will not give rise to an adverse impact upon the amenity of neighbouring residential areas.

Land Use Zoning & Over-Provision of Retail Use

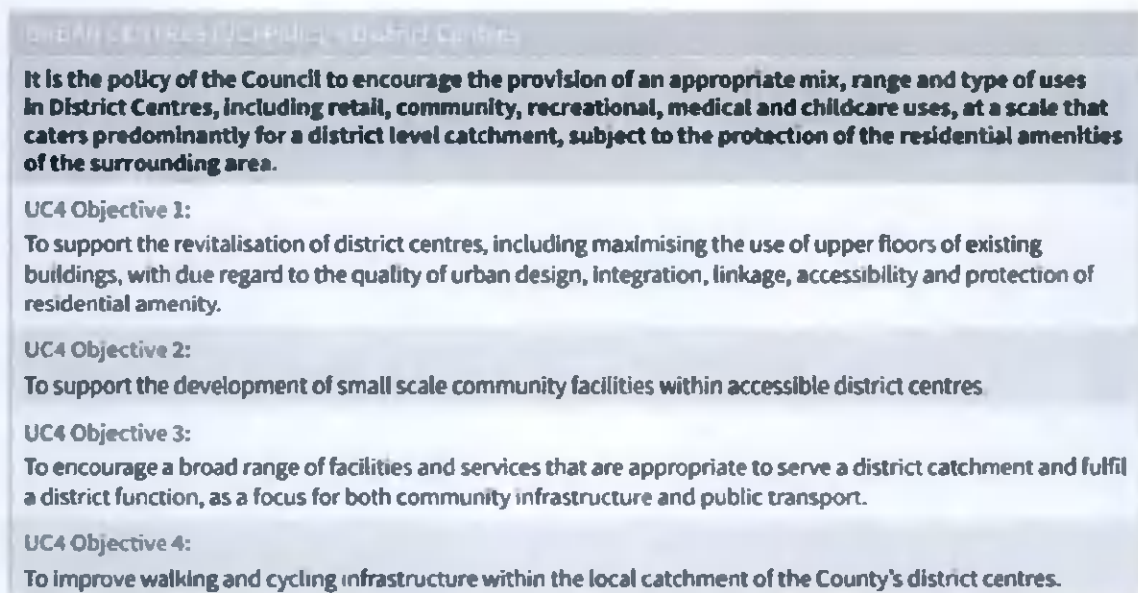
The proposed development seeks permission for the construction of a two-storey commercial building providing two new units: Unit 1 is proposed as a shop and Unit 2 is proposed for professional services (health centre, office or gymnasium). As outlined in the planning application documents, the proposed development measures a total gross floorspace area of 1,574 sq.m. with Unit 1 accounting for 1,057 sq.m.

The subject site is zoned 'District Centre' within the South Dublin County Development Plan 2016-2022 (hereafter 'the Development Plan'). The 'District Centre' land use zoning seeks:

"To protect, improve and provide for the future development of District Centres"

An excerpt of the policy objectives for District Centres from the Development Plan is provided at Figure 1 for information.

Figure 1: Policy Objectives for District Centres Development Plan



As set out by the supporting policy objectives (UC4 Objectives 1-4), District Centres are typically characterised by a broad range of uses, facilities and services serving the local catchment. In terms of the retail offer at the shopping centre, we highlight the existing presence of a large SuperValu

store for convenience food shopping and a Dunnes Stores for comparison goods (clothes/home goods). The shopping centre also provides additional retail services such as cafes, an off-licence, hot food unit and pharmacy and professional services such as estate agents and opticians.

Given the land use zoning pertaining to the site as referred to, it is considered that the proposed extension does not represent an appropriate development of the subject site by virtue of providing an additional retail unit when the Centre is already adequately served in this respect as per the aforementioned Supervalu and Dunnes Stores units. The opportunity exists to redevelop the subject site in order to provide an optimal mix of uses that fully aligns with the land use zoning and policy objectives as set out within the Development Plan.

In addition to retail, District Centres may include, residential, community centres, childcare facilities, enterprise centre, recreational facilities, public houses¹ as set out within the Development Plan. It is considered that a more appropriate use of the site to provide community or recreational facilities for example would be more optimal for this District Centre as such uses are not available in the Shopping Centre. The District Centre and locality is well served in terms of retail offer (convenience and comparison goods) through the aforementioned operators already in existence at the Shopping Centre along with a Tesco Superstore situated c.1km to the north west.

Taking account of the above commentary, should this application be granted, we consider that it would represent a missed opportunity to provide a mix of uses at this location. There is a concern that the proposal would result in an over-provision of convenience retailing that could negatively impact Lucan Village. The zoning objective is reflective of the future aspirations for the lands, and as such it is considered that an additional retail use would be a missed opportunity given the lack of community and recreational uses for example.

Design & Appearance

In addition to the above commentary, there are concerns that the proposed design and appearance of the development has not been appropriately considered for the application site and does not bring forward the optimum design solution. We contend that the proposal fails to accord with the Key Principles as set out in the Retail Design Manual.

The Retail Planning Guidelines 2012 addresses design and sets out that design quality in retail development can make an important contribution to the vitality and viability of city and town centres, and designs which are inappropriate for their contexts, or which fail to realise opportunities for improving the character and quality of their locations should not be accepted.

The proposed design and appearance of the extension appears alien and visually detrimental to the host Shopping Centre building. The design of the proposed extension fails to appropriately integrate with the existing building due its rather industrial appearance which is characterised by a dark coloured render to the upper floor level. The design and appearance of the proposed

¹ South Dublin County Development Plan, Schedule 5, pg. 292-293

development has not been appropriately considered in relation to the site's characteristics or the adjoining building. This element of the proposal would fail to accord with Section 5.3 of the Retail Planning Guidelines 2012 which states that,

"All designers of retail developments should be encouraged to carry out an appraisal of the distinctive character of the area adjoining the site and to consider how the design and layout of the proposed development responds to, and preferably enriches that character";

Accordingly, it is considered that the proposal fails to accord with the general thrust of the Retail Design Manual 2012 which sets out that,

"designs which are inappropriate for their context, or which fail to realise opportunities for improving the character and quality of their locations, should not be accepted".

As submitted within the application pack, it is illustrated on Drawing PL05 that the signage proposals include a large branded 'LUCAN' sign which is visually inappropriate for the scheme and surrounding context. Further signage zones are proposed to the front of the development. In terms of signage requirements, the Development Plan states that,

"In general, signs on a building should only advertise goods or services that are associated with the premises and no more than 2 advertising signs should be erected on any elevation".

Taking account of the proposals as submitted, the development fails to accord with the Development Plan as mentioned and Key Principles 3 (Context & Character) and 8 (Built Form) of the Retail Design Manual 2012. Therefore, it is submitted that the proposed design of the new extension and car parking areas are considered to be contrary to this guidance.

Residential Amenity

As previously referred to, Urban Centres Policy 4 relates to District Centres and encourages the provision of a mix, range and type of uses but that same should be subject to the protection of the residential amenities of the surrounding area.

The expansion of District Centres in general to provide for the appropriate mix of uses and services is to be welcomed if there is no negative impacts on the amenity of surrounding residential areas. The proposed development is situated in close proximity to residential properties located at Hillcrest Grove (to the west) and Hillcrest Court (to the north) and there is a concern that the development may give rise to an adverse impact upon the residents of the aforementioned properties. For instance, a proposed unloading bay is situated to the rear (west) of the extension and this will result in an increased amount of commercial and HGV vehicle movements at this part of the site. In terms of the proposed Unit 2, this potentially may become a gymnasium and we highlight that the opening hours for such a use could also lead to an increased level of traffic movements due to early and late opening hours. In relation to Unit 2, the application doesn't provide confirmation of the proposed end use and as such, the Local Authority cannot properly assess the impact of the proposal upon the residential amenity of the surrounding area as referred

to. It has been proposed that Unit 2 will either consist of professional services, health centre, office or gymnasium, all of which are different in use. This element of the proposal gives rise to ambiguity regarding the development. As a result, it is difficult to properly quantify the level of impact upon the neighbouring residential areas that are in close proximity to the application site.

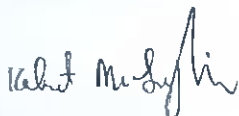
Furthermore, planning application Reg. Ref SDZ19A/0004 was granted Permission in October 2019 for the construction of 237 no. dwellings to the south-west of the site. The new 'Somerton' residential development is also likely to be negatively impacted by the proposal.

Conclusion

In summary, it is considered that the proposal would lead to an over-provision of retail uses at this District Centre resulting in an inappropriate mix of uses at the site and as such fails to accord with Policy UC 4 of the Development Plan. The development also fails to bring forward a satisfactory design that incorporates best practice design principles. Consequently, the application fails to accord with the policies contained within the Development Plan, the Retail Planning Guidelines 2012 and its accompanying Retail Design Manual 2012. The proposed development will also potentially give rise to an adverse impact upon the adjoining residential areas, particularly in terms of increased vehicular movements.

We trust that the commentary and points raised in the submission will be considered by South Dublin County Council in the assessment of this application. Should you have any queries on the above then please do not hesitate to contact us.

Yours faithfully



Robert McLoughlin
Principal
For and on behalf of Avison Young Planning and Regeneration Limited

