



Planning Report and Retail Statement

Planning Authority: South Dublin County Council

Applicant: Better Value Unlimited Company

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Executive Summary

The proposed, non-speculative development, by Better Value Unlimited Company is for an extension to the Kilnamanagh Shopping Centre (a designated District Centre). The development includes a modest increase in sales space and the introduction of community facilities: Health centre and gym uses at first floor level. It is a suitable form of development for the following reasons.

- **Address National Policy objectives to build within the Urban Footprint on underused, brownfield sites:** the proposal will directly address National, Regional and Local Policy to focus new development on centrally located; underused; brownfield sites. This accords closely with NPF11.
- **Addressing Local Planning Policy:** the application comprehensively complies and addresses both policy and objectives for additional services in a designated District Centre location.
- **Opening and enlivening the centre to the wider area:** The proposed development will visually open the centre to the wider area with an extensive glazed façade significantly enhancing visual connectivity with the wider area.
- **Connections to the wider community:** The mixed nature of the proposed development will create stronger links between the centre and local community it serves.
- **Jobs:** The proposed development will create at least 30 new jobs in the Health Centre and Gym facilities.
- **Impact:** The objectives for District Centres in the new Development Plan are fully adhered to and the development can be accommodated without any adverse retail impact on any centre above Kilnamanagh in the County Retail Hierarchy.

1.0 Introduction

Statutory Submission and Fee Calculation

Tony Bamford Planning, Planning and Development Consultants (TBP) have been commissioned by Better Value Unlimited Company to co-ordinate a planning application for the extension of Kilnamanagh Shopping Centre, a designated District Centre.

All relevant communications in respect of this application should be sent in the first instance to Tony Bamford Planning, Airport Hub, Furry Park, Swords Road, Santry, Dublin 9.

Planning Application Fee

A breakdown of the areas of the development are set out in Table 1.0 along with the planning fee arising.

Class	Type	Area (sqms)	Unit cost (Euro/sqm)	TOTALS
4	Extended GFA	2,336sqms	€3.60/sqm	€5900
9	All Signage including Totems	141sqms	€20.00/sqm	€2820
13	All other items	2.58ha	100/ha	€258
Total Fee				€11,487.60

2.0 Context

Kilnamanagh Shopping Centre is located at southern edge of Kilnamanagh housing estate. The site is bounded by the Treepark ring road to the site's east and west and Mayberry Road to its south.

The Shopping Centre has a total gross area of 11,580sqms¹ and includes a Dunnes Stores, multi-level foodstore, and several smaller retail and service units. The centre is mainly two storeys with a first floor, which was originally mostly office until 2006 when a portion of the space was converted to retail use as noted later in the planning history section.

The centre is located inside the Tallaght Kilnamanagh District Electoral Division which is an area of marginally below average on the Pobal Deprivation Index (2016 – www.pobal.ie). Tallaght Tymon DED to its east is classed a disadvantaged and generally the area is classed as marginally below average. Typically, the index would suggest the electoral divisions with this profile have higher level of unemployment, less car ownership, lower education attainment, and higher age dependency ratios.

The centre itself is also showing signs of its age. This application represents a policy and objective compliant extension and general refurbishment of the centre which should be supported by South Dublin County Council. It will generally enhance the overall appearance of the centre, create a more diverse, community, focused offer, meaning householders will have important local services closer to home.

¹ Refer to Section 3.0 Planning History for wider explanation of this figure.

3.0 Planning History

To understand the rationale for the proposed development it is important to understand the planning history of the site. A list of applications is included at Appendix 1. We focus here in the two applications of most relevance to this application: SD06A/0095 and SD06A/0850.

SD06A/0095: Permission was granted for the change of use of use of the first floor from offices to retail, minor alterations to east and west elevations and 28 additional parking spaces.

Condition 3 limited the net convenience and comparison sales space to those figures included in the Retail Impact Assessment received by the Planning Authority on 05/01/06. The stores existing net sales area, not including the mall retail space, totals of circa. 6,121sqms (Ground floor convenience = 3083sqms, Ground Floor comparison = 1,667sqms, and, first floor comparison = 1,371sqms)

This first floor sales area was used by Dunness Stores for a time as a textiles sales area.

SD06A/0850: This application arose from a RFI item under SD06A/0095 which concerned itself with various changes and additions to the development that were not evident in the first 2006 application. Retention Permission was granted for this retention which essentially placed the entire development into a regularised state.

Table 1.0: Comparative floorspace Analysis (Permitted and as per updated Survey by PDA).

Schedule		Floor Area as per Ref: SD06A/0850 (Sqm)	Project Design Architect Floor Areas
Ground Floor	Net Anchor Convenience	3,083	3,083
	Anchor Convenience Circulation	268	268
	Anchor Convenience Service/Storage	924	924
	Net Anchor Comparison	1,667	1,667
	Anchor Comparison Circulation	383	383
	Anchor comparison Service/Storage	453	445
	Café Sol	0	0
	Total Unit Shop Comparison	527	478
	Total Unit Shop Non-Retail Services	328	306
	Total Unit Shop Circulation	681	622
Ground Floor Total		8,314	8,176
Mezz	Comparison Mezz	343	346
	Grocery Mezzaine Metal Deck	200	370
	Grocery Storage on First Floor Level	185	
Mezzaine Floor Total		728	716
First Floor	Retail Area Approved SD06A/0095	1,528	Textiles 1371 BOH 133 1,504
	Admin/Office/Canteen	839	813
	Common Areas	0	0
	Grocery Storage over dell/bakery	382	371
	First Floor Total	2,749	2,688
Total Floorspace		11,791	11,580

The application form of this application notes that the total gross floorspace of the centre was 11,791sqms. As the table below indicates the most recent survey of the centre indicates a total gross floor area of 11,580sqms.

To that end the permitted floorspace of that development is the same today as it was in 2006. Table 1.0 compares the retained floorspace under SD06a/0850 to the most recent review of the floorspace for the preparation of the application plans by PDA Architects. There are a few minor and immaterial deviation arising from the most recent survey of the centre by PDA. There are small deviations at ground and first floor which are of no consequence in material planning terms and arise from having to conduct a fresh survey of the centre.

The PDA figures in Table 1 are used as the baseline for the proposed works outlined in Table 2.0 in the next section.

3.0 Proposed Development

The proposed Development

The proposed development seeks an extension, change of use and alterations to Kilnamanagh Shopping Centre.

Table 2.0: Proposed Development.

<u>Location</u>	<u>Existing</u> (sq.m)	<u>Total Existing</u> (sq.m)	<u>Proposed</u> (sq.m)	<u>Total Proposed</u> (sq.m)
Ground Floor				
Net Anchor Convenience	3,083sq,m		3,083sq,m	
Anchor Convenience Storage	924sq,m		924sq,m	
Anchor Convenience Circulation	268sq,m		271sq,m	
Net Anchor Comparison	1,667sq,m		3,447sq,m	
Anchor Comparison Storage	445sq,m		388sq,m	
Anchor Comparison Circulation	383sq,m		338sq,m	
Unit Shop Non Retail service	306sq,m		306sq,m	
Unit - Shop Comparison	478sq,m		478sq,m	
Unit - Cafe Sol.	0sq,m		0sq,m	
Unit Shop - Circulation	622sq,m		580sq,m	
Subtotal		8,176sqm		9,815sq,m
Mezzanine Floor				
Comparison Storage	346sq,m		346sq,m	
Mezzanine Floor Convenience Storage	370sq,m		370sq,m	
Sub total		716sqm		716sqm
First Floor				
Textiles	1371 sq.m.	1504 sq.m	0sq,m	
Back Of The House	133 sq,m			
Gym	0sq,m		790sq,m	
Health Centre	0sq,m		1,411sq,m	
Grocery Storage Over Deli/Bakery	371sq,m		371sq,m	
Common Areas	0sq,m		0sq,m	
Staff/ Admin	813sq,m		813sq,m	
Sub total		2,688sqm		3,385sq,m
		Total = 11,580sqm		Total = 13,916sqm

Main Components of the Development

There are two main components to the proposed development:

The main structural component of the application of the application is the extension of the centre along its east side. This extension then has two main subcomponents:

1. Extension of the ground floor to allow for the relocation of retail sales area, currently at first floor, to be relocated resulting in an increase in the textiles/non-food sales area at ground floor level. The gross floor area of the ground floor increases from 8,176sqms to 9,815sqms. **That is a total GFA increase 1,639sqms.**

Within the additional floor area, the net sales space dedicated to retail increases from 1,667sqms to 3,477sqms. An increase in **net sales area at ground floor level of 1,780sqms².**

2. Extension of the first-floor area to allow for increased floor area to service both a gym and Health centre. The gross floor area increases from 2,688sqms to 3,385sqms as rise of 697sqms. The retail area which currently occupies the first floor extends to **1,371sqms net**. When this is removed and essentially replaced by the additional 1,780sqms net comparison sales at ground floor the actual increase in net comparison sales spaces in the centre is only **409sqms**. There is no increase in the mezzanine areas.

We will consider capacity and retail impact issues arising from this relocation in section 5.0 of this report. But in summary, the historic planning application SD06A/0095 was informed by a capacity and retail impact assessment which considered amongst other items that there was sufficient capacity for a sales area on the first floor of **1371sqms** (Table 2.1 of TPA Retail Impact Assessment stamp dated June 2006). It also confirmed that there would be negligible impacts arising on centres such as The Square in Tallaght.

The relocation of this floorspace to the ground floor is effectively already accounted for in terms of both capacity for and retail impact of its trading profile. We explore this point in more detail in Section 5.0 of this report.

The **gym** will be a member only operation and several potential operators have been identified for its use.

The **health centre** would be a traditional doctor led surgery. The number of consultation rooms is expected to be 21 and these are illustrated on the Proposed First Floor Plan.

² Note that under PA Ref: SD06A/0095 the net comparison sales area increased similarly from 1667sqms to 3038sqms.

Other components of the Development

New Pedestrian Entrance Ramp

The development incorporates a new mobility impaired ramp beside the main steps on the south boundary of the development. The extension provides the opportunity to include this vital accessibility change in the build contract.

Car parking and Circulation

Given the extension of the building to the east of the store, there are changes to the layout of the car park, naturally. The number of parking spaces reduces overall which should not in itself be a substantive planning issue.

Elevational changes - Recladding

Recladding three and half sides of the building.

Signage

The centre has never had a totem sign to indicate the retailers and services located in the centre. It is probably one of the only such centres that has not historically had such a facility.

There are two proposed 4-metre-tall totem signs.

Electric Vehicle (EV) Parking

Presently the centre does not have any EV parking spaces. This application will include proposals for 4 immediately dedicated and functional spaces. Further spaces will be wired for future EV. The total amount at this time has not yet been determined.

Green Roof

The proposed roof on the extension is intended to be used as Green Roof as part of the SUDS proposals.

General Design Statement – SDCC Urban Design and Pre-Planning Guidance (no.8)

The design and layout of the proposed development to a large degree follows from the internal reorganisation of the store. It is not possible to extend the building easily to the west as this is the main service location. Moreover, there are restrictions on convenience sales space which also sites on the west side of the store so that would require a substantial ground floor reorganisation of the entire ground floor plate.

The movement of the textiles area from the first floor to the ground floor textiles area also justifies the extension to the east of the store. Another aim of the proposed design is to "open up" and elevate the east, extension façade by introducing a substantial, glazed component. This will help to integrate the building, visually into the wider community. The wider recladding of the elevations of the centre will lead to a more unified design which is more sympathetic to the surroundings.

The traffic counts carried out for the Traffic and Transportation Assessment also show that the majority (56%) of the vehicles enter the centre via the east entry point. This had a role in highlighting where the most relevant point for an extension should be.

A more details Design Statement has been prepared by PDA Architects and is enclosed with the planning pack.

4.0 Policy Considerations

The purpose of this chapter is to review the key policy that will influence and guide the decision-making process. The key land use policy in this case is included in the new South Dublin County Development Plan.

National Planning Framework (NPF) – 2018

The NPF seeks to direct investment to Dublin and other main Cities including Galway, Limerick, Cork, and Waterford. Its main aims are:

- *Guide the future development of Ireland, taking into account a projected 1 million increase in our population, the need to create 660,000 additional jobs to achieve full employment and a need for 550,000 more homes by 2040;*
- *Enable people to live closer to where they work, moving away from the current unsustainable trends of increased commuting;*
- *Secure more compact forms of urban development in all types of settlements.*
- *Regenerate rural Ireland by promoting environmentally sustainable growth patterns;*
- *Plan for and implement a better distribution of regional growth, in terms of jobs and prosperity;*
- *Transform settlements of all sizes through imaginative urban regeneration and bring life / jobs back into cities, towns and villages;*
- *Co-ordinate delivery of infrastructure and services in tandem with growth, through joined-up NPF/National Investment Plan and consistent sectoral plans, which will help to manage this growth and tackle congestion and quality of life issues.*

The focus of the NPF is the location of new development in sustainable, compact, brownfield, locations, appropriate for the use proposed: central, designated locations such as the application site. Access to bus routes, taxi services, ease of walking and cycling, linked trips etc. are all part of the tapestry of sustainable measures the NPF advocates.

This application strongly accords with the objectives of the NPF. The development accords with NPF objectives: 11 and 27. In particular, the following are relevant:

National Policy Objective 11

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

National Policy Objective 27

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

Objective 11 and 27: Objective 11 provides for a presumption in favour of development which is in cities, towns, and villages: essentially compact urban development on brownfield sites such as the application site.

In so far as Objective 27 is concerned, it seeks greater opportunities for walking and cycling, the application site is designated for the use proposed, in an area already established as a key, service centre for the area. It is an area where people already walk and cycle to and from as a central, commercial hub of the area. The development will further enhance that role. This application will enhance opportunities for cycling and walking.

The Retail Planning Guidelines 2012 (“The Guidelines” or RPG)

Retail is one of the most critical sectors for employment in the Irish market. The Retail Guidelines, since 2001 when published in their first iteration, have always emphasised this point. They note in the introduction:

T 1.3 Importance of the Retail Sector: Employment in the combined retail and wholesale sector in 2010 was estimated by the Central Statistics Office at almost 270,000 people or about 14.7% of people employed in the State.

Apart from direct and indirect employment, retailing plays a major role in attracting people to the centre of cities, towns, and villages, thus contributing to the overall economic vitality of those centres and supporting their role as centres of social and business interaction in the community.

It is important therefore that urban centres, which also tend to be at the hub of public transport services, retain retailing as a core function. Retailing also supports the considerable investment by the public and private sectors in urban renewal, by providing shopping facilities to residents and by adding to the vitality and attractiveness of inner areas of cities and towns which is important also in the context of the tourism sector. Smaller towns and villages serve their surrounding rural areas by providing a range of facilities and services.



Source: IBEC – Retail Ireland

The sector has been one of the harder hit sectors of the economy during Covid19 restrictions and is fighting a continuing battle for survival in the face of online sales platforms.

The CSO's latest Retail Sales Index which records activity for February 2022 notes:

Several sectors showed very large annual increases in the volume of sales, compared with February 2021 when a full lockdown of non-essential retail and services was in force. The volume of sales in Bars rose by 726% compared with February 2021. Bars were closed in February 2021 except where there were ancillary services. Despite the large recovery in February 2022, Bar sales remained 30.2% lower than their pre-COVID-19 level in February 2020. Clothing & Footwear saw an annual volume increase (+295%), Department Stores (+88.1%) and Books, Newspapers & Stationery (+79.5%). In these sectors, the annual increase reflects a recovery from a very low base in February 2021 when the country was in Level 5 lockdown.

The clothing sector was of course non-essential during the pandemic and Dunnes Stores like others had to exclude these areas from their sales floorplate for extended periods throughout 2020 and 2021. The above figures illustrate the dramatic impact of the pandemic and the extent of the recovery since retail has been allowed to open.

It indicates the continued growth in online sales, the progress of which was further compounded by many people turning to online platforms for shopping during the height of the Covid19 crisis. The CSO Retail Sales Index notes:

The figures only include retailers based in Ireland. Online sales were estimated to account for 4.1% of total Retail Sales in December 2019 and for 3.3% in the year 2019. These estimates do not include online purchases from abroad.

The sector with the highest share of its sales online in December 2019 was Online & Mail Order at 87.5%. This sector accounted for 1.0% of turnover in the 2017 Annual Services Inquiry. For Electrical Goods the online share was 13% and for Clothing, Footwear & Textiles it was 7.3%.

The importance, therefore, of non-speculative retail/community infrastructure developments, such as that proposed in this case cannot be underestimated. It is these forms of development is an important component to improving standards of living as well as providing greater, local, access to a range of competitive retail opportunities and a wider choice of services.

The importance of a "bricks and mortar" retail development in a designated and preferred location, is significant and critical to the merit of this project.

National Objectives:

The Guidelines note the following national objectives:

2.5 Policy Objectives: Taking account of the previous sections, these guidelines identify five key policy objectives to be progressed by planning authorities in planning for and addressing the development requirements of the retail sector. These objectives relate to the needs for plan-led development, a focus on city and town centres for the majority of future development, a proactive approach by local authorities in enabling city and town centre renewal and development to come about and a high-quality approach to urban design.

2.5.1 Plan-led Development/Retail Strategies: The first national policy objective is to secure plan-led development. Locations that have strong retail functions and a high-quality shopping environment in Ireland and abroad tend to represent the historical settlement patterns but also the outcomes of plans and strategies that have:

- anticipated the requirement for retail development in line with regional strategies; and
- facilitated the development required in suitable locations, sometimes enabling the development of those locations through acquisition, assembly, and resale of key sites, facilitating infrastructure and bringing the key infrastructure providers together.

Therefore, future retail development should be plan-led following the settlement hierarchy, including the identification of retail requirements and appropriate planning policies and objectives and implementation measures aimed at securing development plan objectives.

2.5.2 Sequential Development Approach: The second national policy objective is to promote greater vitality in city and town centres by promoting a sequential approach to retail development.

2.5.3 Competitiveness in the Retail Sector: The third national policy objective is to ensure that the planning system continues to play its part in ensuring an effective range of choice for the consumer, thereby promoting a competitive marketplace.

Strong competition is essential to reduce retail costs and ensure that savings are passed on to retail customers through lower prices. Competition also promotes innovation and productivity.

The planning system should not be used to inhibit competition, preserve existing commercial interests or prevent innovation. In interpreting and implementing these Guidelines, planning authorities and An Bord Pleanála should avoid taking actions which would adversely affect competition in the retail market. In particular, when the issue of trade diversion is being considered in the assessment of a proposed retail development, planning authorities and An Bord Pleanála should assess the likelihood of any adverse impacts on the vitality and viability of the city or town centre as a whole, and not on existing traders.

2.5.4 Encouraging Sustainable Travel: *The fourth national policy objective relates to securing a general shift towards sustainable travel modes through careful location and design of new retail development relative to the catchment area being served. While the private car tends to be attractive for activities such as more substantial convenience goods shopping or bringing home bulky goods, careful location of retail developments and attention to detail in terms of how they are connected by footpaths and cycle facilities to surrounding areas can substantially boost trips on foot or bicycle for smaller purchases and make a substantial difference in encouraging smarter travel in line with the Smarter Travel strategy.*

2.5.5 Retail Development and Urban Design: *The fifth national policy objective is to ensure that retail development plays its part in realising quality outcomes in relation to urban design. Quality design aims to create attractive, inclusive, durable, adaptable places for people to work in, to live in, to shop in, or pass through.*

The proposed development accords closely with the national objectives. Indeed, the proposed development is:

- In response to the Development Plan – it is Plan Led and appropriate in this regard.
- It accords with the Sequential approach. The Guidelines note that District Centres are a preferred location for new retail floorspace.
- It will add, in a policy compliant manner to the competitiveness of the retail in the area, ensuring fuller representation by food retailers in a busy district centre area.
- The majority of additional floorspace at ground floor is already tested in terms of retail impact and capacity.
- In relation to district centres the Guidelines note the role of the Development Plan:

2.2.4 District Centres: *The core strategies of development plans within the larger urban centres above, including Dublin City, other Gateway cities and towns, hub towns as well as other large towns, (generally in excess of 10,000 population), will provide details of the relevant city and town centre areas as well as any locations designated for significant growth within the environs of the city or town in question. The core strategy will also show the retail areas including district centre(s) (See Annex 1 - Glossary of Terms) which provide essential services, including an appropriate level of retailing and*

amenities to serve the catchment population within those environs. See also Chapter 3, Section 3.4.

Having designated the relevant city and town centre areas and any district centres in the core strategy, it is the function of the retail strategy of the relevant development plan to specify the level and types of retailing that will be appropriate to those areas.

In line with this Guidance, the County Development Plan designates the site as a district centre.

South Dublin County Development Plan 2022-2028

The new South Dublin Development Plan 2022-2028 was adopted in June 2022. It comes in effect in August 2022 and will be the relevant local policy document.

The subject lands are zoned in their entirety as District Centre. The Centre is an important component in the County's retail hierarchy.

Level 3	<p>Adamstown SDZ District Centre (planned), Crumlin (Ashleaf), Clonburris SDZ District Centre (planned), Clondalkin Town Centre, Citywest Shopping Centre, Kilnamanagh Shopping Centre, Lucan Shopping Centre, Rathfarnham Shopping Centre</p>	<p>Town and/or District Centres and Sub-County town Centres (Key Service Centres)</p> <p>These centres will vary both in the scale of provision and size of catchment depending on proximity to a major town centre, but a good range of comparison shopping would be expected (though no large department store), some leisure activities and a range of cafés and restaurants and other mixed uses. They should contain at least one supermarket and ancillary foodstores alongside financial and other retail services. District Centres should generally cater for a population of 10,000-40,000 people.</p>
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Figure: Retail Levels

It is a level 3 District centre with the Tallaght Neighbourhood.

Settlement		Centres and Retail Hierarchy		
RSES Settlement	SDCC Neighbourhood Area	Centre Name	Land Use Zoning	SDCC Retail Hierarchy Level
Dublin City and suburbs - Metropolitan Area.	Tallaght	Tallaght	Town Centre	Level 2
		Kilnamanagh Shopping Centre	District Centre	Level 3
		Tallaght Village	Village Centre	Level 4

Figure: Settlement and Retail Hierarchy

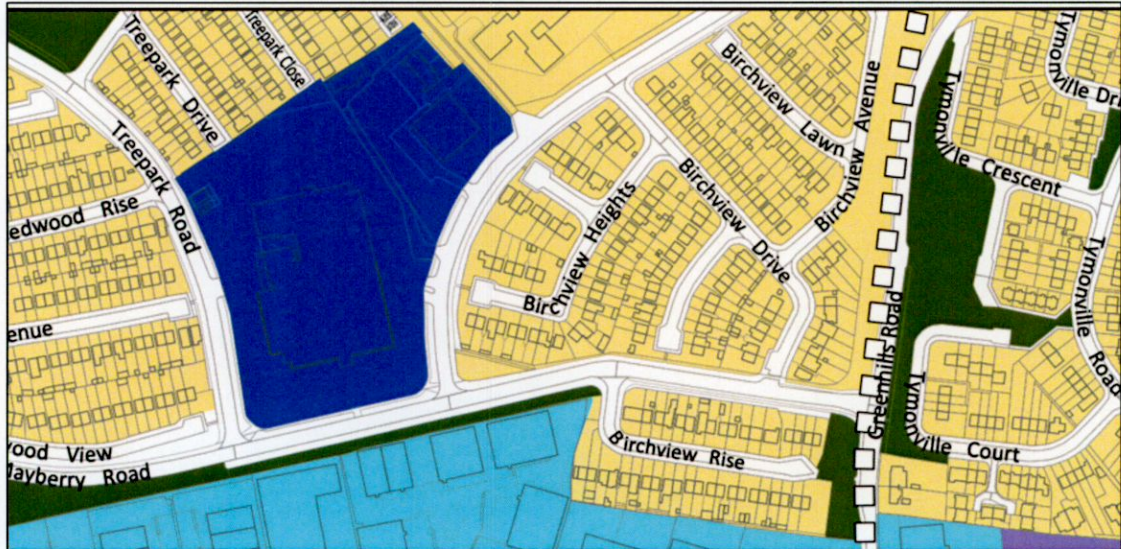


Figure: Zoning Plan Extract.

In relation to District Centres section 9.5.4 observes:

District centres are secondary urban centres, which serve the environs of Tallaght, Clondalkin and Lucan. These centres tend to be purpose built shopping centres. The role of district centres is to provide a focal point for the community providing a district level retail, service and community role for the residents of South Dublin County. District centres reflect both level 3 and 4 retail designation under the retail hierarchy, reflecting their differing role and scale within the County.

Various objectives apply as follows. Some are relevant to this assessment:

Objective	Response
<p>EDE8 Objective 3: To support new retail provision in the County to meet the needs of the County's population and to direct new retail floor space into designated retail centres in accordance with the County Retail Hierarchy, so that centres can maintain and expand their retail offer.</p>	<p>Planning permission for this development will assist in generally improving the diversity of offer at this location and in accordance with the role of Level 3 centres (see above) increase the diversity of localised services to the benefit of the districts population. The enhanced diversity of the centres offer will also help to sustain the retail offer.</p>
<p>EDE8 Objective 4: To support the viability and vitality of the existing retail centres in the County, in particular town, village and district centres and to facilitate a competitive and healthy environment for the retail industry, while reinforcing sustainable development.</p>	<p>This development will directly support the viability and vitality of this designated centre.</p>
<p>EDE8 Objective 6: To facilitate and provide for, the refurbishment and replacement of obsolete floorspace and promote the use of vacant floorspace.</p>	<p>This objective is directly applicable to the proposed development. Covid 19 has changed how retailers and customers use their space. The use of the upper floor for clothing became obsolete during the pandemic. This application offers an opportunity to reuse and expand the first floor space for a more diverse range of district services and enhance the retail offer</p>

	of the Dunnes stores unit at ground floor level.
EDE8 Objective 7: 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.	This centre is a defined district centre and preferred location for new retail development. Therefore, it complies with the sequential approach.
EDE8 Objective 8: To direct new major retail floorspace in the County to designated centres at the appropriate level within the retail hierarchy, and to further direct major retail development in designated centres into the Core Retail Areas.	The planning application seeks to relocate retail sales space within a designated centre. This fully accords with the sequential approach.
EDE8 Objective 9: To support place-making enhancements and upgrades to our villages and centres to create vibrant and attractive places for people and businesses.	The application includes placemaking improvements and enhanced elevations as set out in the accompanying plans and design statement.
District Centre Specific Objectives	
EDE12 Objective 1: To promote the development of District Centres as sustainable, multifaceted, retail led mixed use centres and support their enhancement and upgrade.	The nature of the extension including the change of use elements will directly add to the multi-faceted profile of the centre. The centre remains retail led. The development is an <i>enhancement</i> and <i>upgrade</i> of the centre.
EDE12 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.	The nature of the retail offer proposed here does not change from that permitted in 2006. The Health centre and gym are appropriate lower level, local services that will provide more people with ease of local access and ensure that on trip to this centre can service a number of purposes. Higher level centres such as Tallaght have a vastly more diverse range of services and depth of service and retail which will not be impacted by this application.

Zoning

The subject property is located on lands zoned District Centre ("DC"). The Zoning Objective 'DC': 'To protect, improve and provide for the future development of District Centres'. Uses permitted, open to consideration and not permitted are listed below.

Use Classes Related to Zoning Objective	
Permitted in Principle	Advertisements and Advertising Structures, Bed & Breakfast, Betting Office, Car park, Childcare Facilities, Community Centre, Cultural use, Doctor/Dentist, Education, Enterprise Centre, Funeral Home, Garden Centre, Guest House, Health Centre , Home Based Economic Activities, Housing for Older People, Industry-Light, Live-Work Units, Nursing Home, Office-Based Industry, Offices less than 100 sq.m, Offices 100 sq.m - 1,000 sq.m, Offices over 1,000 sq.m, Off-Licence, Open Space, Petrol Station, Place of Worship, Primary Health Care Centre, Public House, Public Services, Recreational Facility, Recycling Facility, Residential, Residential Institution, Restaurant/Café, Retail Warehouse, Retirement Home, Shop-Local , Shop- Neighbourhood , Social Club, Sports Club/Facility , Stadium, Veterinary Surgery, Work-Live Units.
Open for Consideration	Allotments, Conference Centre, Crematorium, Embassy, Hotel/Hostel, Motor Sales Outlet, Nightclub, Science and Technology Based Enterprise, Service Garage, Shop-Major Sales Outlet , Traveller Accommodation, Warehousing, Wholesale Outlet.
Not Permitted	Abattoir, Aerodrome/Airfield, Agriculture, Boarding Kennels, Camp Site, Caravan Park-Residential, Cemetery, Concrete/Asphalt Plant in or adjacent to a Quarry, Data Centre, Fuel Depot, Heavy Vehicle Park, Hospital, Industry- Extractive, Industry-General, Industry-Special, Outdoor Entertainment Park, Refuse Landfill/Tip, Refuse Transfer Station, Rural Industry-Food, Scrap Yard, Transport Depot, Wind Farm.

The uses are generally permitted in this centre. The only potential area of discussion relates to the reference to Shop-Major Sales outlet which is defined in the Glossary of terms as:

Shop – Major Sales Outlet: Superstores in excess of 2,500 sq.m. of net retail floorspace but not greater than 5,000 sq.m net retail floorspace which are larger in scale than neighbourhood shops or are very specialised and therefore serve a wider area including district centres and town centres.

The existing Dunnes Stores unit is already definable as a Hypermarket. The Retail Planning Guidelines 2012 characterises such retail outlets as:

Single or multi-level self-service store selling both food and a range of comparison goods, with net retail floorspace area in excess of 5,000 M2 with integrated or shared parking.

The Dunnes Stores unit by virtue of being multi-levelled and having a sales area of 6121sqms (convenience 3083sqms, ground floor comparison 1667sqms and first floor comparison 1371sqms).

So in effect this is partly an application for a small extension to the sales space of a hypermarket that will also be on one level, in accordance with the above definition. A hypermarket is not listed in the zoning matrix and therefore falls to be considered thus:

Uses that have not been listed under the land use zoning tables will be considered on a case-by-case basis in relation to conformity with the relevant policies, objectives and standards contained within the Plan, particularly in relation to the zoning objective of the subject site and its impact on the development of the County at a strategic and local level.

Bearing in mind the specifics of this application, which mainly seeks to relocate retail space within the centre, the small increase in net comparison sales area is acceptable.

Comments on Policy

The proposed development in the whole is acceptable in principle in terms of both relocation of the sales space from first to ground floor creating a more coherent and efficient shopping experience.

Moreover the need for a first floor sales area in this centre is more limited than in other centres as it does not anchor or drive trade to any other services at first floor level: there are no other service or retail units at first floor level. The pandemic and the closure of the space has helped the business to better focus on priorities for the centre and how it needs to trade in response to feedback from customers.

The first floor is therefore more suited to uses that in themselves have a specific draw for locals and we consider a gym and Health centre area appropriate uses in that regard.

The relocation of the retail space is acceptable in terms of general principle and also the sequential approach as retail space is not (1) being lost but rather relocated with a minor increase in permitted space (2) it is remaining within the District Centre designation which is appropriate.

5.0 Retail Impact Assessment

A Retail Impact Assessment (RIA) is a tool for assisting decision makers when appraising retail developments. The process of Retail Impact Assessment is not simply about calculating nominal percentage levels of Trade Diversion and Retail Impact. This is merely a product of a numerical exercise which is largely theoretical and based on professional, reasoned, assumptions.

The Retail Impact Assessment is an amalgam of those numerical outputs, policy considerations, location and proper planning and sustainable development.

The tests associated with Retail Impact Assessment require that a retail proposal can:

- *support the long-term strategy for city/town centres as established in the retail strategy/development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres;*
- *have the potential to increase employment opportunities and promote economic regeneration;*
- *have the potential to increase competition within the area and thereby attract further consumers to the area;*
- *respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support;*
- *cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent developments or other outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community;*
- *cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;*
- *ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society; and/or*
- *link effectively with an existing city/town centre so that there is likely to be commercial synergy.*

Need for a Retail Impact Assessment

The Guidelines note as follows in the context of the Sequential Approach:

4.4 Planning applications for retail development proposals must comply with the criteria on location, suitability of use, size and scale and accessibility set out in the retail guidelines and development plan/joint or multi authority retail strategy to ensure that the site chosen is the most suitable and best available site for the type of retailing proposed.

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.

To place this in wider context The Guidelines note at Section 4.11.1 that:

Large convenience goods stores should be located in city or town centres or in district centres or on the edge of these centres and be of a size which accords with the general floorspace requirements set out in the development plan/retail strategy to support and add variety and vitality to existing shopping areas and also to facilitate access by public transport for shoppers.

Section 11.3.6 of the County Development Plan notes that major retail proposals over 1000sqms are required to provide a detailed Retail Impact Assessment. This application does not in our opinion constitute a "major" retail proposal nor does it breach the 1000sqms figure.

This is not an application for a total of 1,780sqms of new floorspace but rather the relocation of an existing 1,371sqms of net comparison space from the first floor to the ground floor and the creation of only 409sqms of new, comparison floorspace. To place that in some context. The total retail floorspace of the centre including the Dunnes Stores and smaller units and the first-floor retail space is circa 8,000sqms. The additional 409sqms increase is a circa. 3.5% increase in the centres overall, net retail floorspace.

That renders Kilnamanagh, even with the small increase in sales space, as one of the smaller District Centres in the Metropolitan area. The Retail Strategy for the GDA 2008-2016 (which remains relevant and is also referred to in the new Development Plan) notes of level 3 District Centres³:

As highlighted above, the level of floorspace existing in each centre does vary considerably even if the centres are at the same level in the hierarchy within this context it is important to note that DoEHLG Retail Planning Guidelines sets a guideline size of approximately 10,000 sqm net and up to 20,000 sqm net where appropriate in the metropolitan area of the GDA (page 69)

Kilnamanagh is currently well below the lower threshold for District Centres. The additional 409sqms of floorspace is a minor increase well within the 1000sqms floorspace threshold for retail impact assessment.

With reference to the Thresholds for Retail Impact Assessment as Page 82 of the Retail Strategy for the GDA 2008-2016 it notes one is required where the gross floor area would be greater than 2500sqms. The total floorspace of the entire extension to this centre is 2,336sqms increasing from 11,580sqms to 13,916sqms. This figure is smaller as a portion

³ Kilnamanagh – Designated level 3 District Centre.

of it includes the proposed non-retail offer (gym and Health centre at first floor). In any event, the threshold is not breached.

Having regard to the fact the site is zoned as District Centre, the application very much complies with the Development Plan in retail planning terms. **To this end, we do not consider a detailed Retail Impact Assessment is required in this case. Nor indeed, is a sequential assessment required as this is the preferred location for comparison floorspace in accordance with the Development Plan and the national Retail Planning Guidelines.**

It is entirely evident that when a retailer makes an application for a new sales space and that space is proposed to be located *inside* a designated district centre, which is a preferred location for such retail, the requirement to then prove that it is acceptable in terms of numerical retail impact on the very centre in which it is located, becomes self-evidently contradictory and thus irrelevant.

In that context, the location in a designated District centre will have a symbiotic relationship with the retail offer within the centre area and to that end, it must in any reasonable assessment, be considered a positive impact.

Market Share Analysis

The comparison turnover of the additional 409sqms of floorspace is circa Euro 2.3million in 2025⁴. If we go to Table A of Appendix 5 of that study the total turnover of "Study Area 5" (Tallaght) in which Kilnamanagh is located, is circa Euro 391million.

Appendix 5 – Table A		Existing Comparison – Estimated Expenditure Capacity (2025)		
Centre	Floorspace sqm	Turnover Ratio	Total Expenditure	Share %
STUDY AREA 1 - IRIBEN CRY	365,147	9.114	3,327,804,300	38.65
STUDY AREA 2 - LIFFEY VALLEY CENTRE	38,929	8.578	333,913,787	3.88
STUDY AREA 2 - LIFFEY VALLEY OTHER	30,775	6.433	197,979,593	2.30
STUDY AREA 3 - DENDRIM	45,848	9.114	417,840,408	4.85
STUDY AREA 4 - BLANCHARDSTOWN	43,773	8.578	375,463,233	4.36
STUDY AREA 5 - TALLAGHT	45,640	8.578	391,477,439	4.55
STUDY AREA 6 - SWORDS	14,133	8.578	121,225,913	1.41
STUDY AREA 7 - BAYAN	28,707	7.505	215,455,193	2.50
STUDY AREA 8 - KEDARE	55,867	7.505	419,299,657	4.87
STUDY AREA 9 - GDA WEST	2,000	6.433	12,866,261	0.15
	Total		5,813,325,783	67.51
	Available Expenditure		8,610,579,670	100.00
	Surplus/Leakage		2,797,253,887	32.49

The total increase of Euro 3.5million represents a diminutive 0.07% increase in turnover, which simply will not be felt by any other centres in terms of tangible retail impact.

To place that in wider context, it would increase the total share of the Tallaght Study area in 2025, from Euro391,477,439 to Euro394,985,841. It is reasonable to conclude that the additional floorspace will have no impact. Therefore, no retail impact assessment is required in this case. This is also in accordance with EDE12 Objective 2 and preceding objectives which seek to enhance District Centres as preferred locations for

⁴ The sales density figure is derived from Table 6.1 (page 18) of the Retail Impact Study submitted with the Liffey Valley Extension application granted by the Board at the end of 2021 PA Ref: SD20A/0089. The relevant figure is Euro 8578/sqm.

new retail but in a manner, according to Objective 2, which will not have an adverse impact on higher order centres.

Retail Impact Assessment – Section 4.9 Retail Planning Guidelines.

Retail Impact is an assessment of various criterion associated with the development under Section 4.9 of the Retail Planning Guidelines 2012. For example, whilst there may be diversion or trade from other retailers to the new facility, that is not the concern of the Planning Authority. The following assessment of the Criteria is based on location of the store, in a District Centre.

Assessment against Section 4.9 - Guidelines for Planning Authorities-Retail Planning 2012. Retail Impact Assessment.		
Criteria	Comment	Met
1	Support the long-term strategy for city/town centres as established in the retail strategy/development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres;	✓
2	Have the potential to increase employment opportunities and promote economic regeneration	✓
3	Have the potential to increase competition within the area and thereby attract further consumers to the area;	✓
4	Respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support;	✓
5	Cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent developments or other	✓

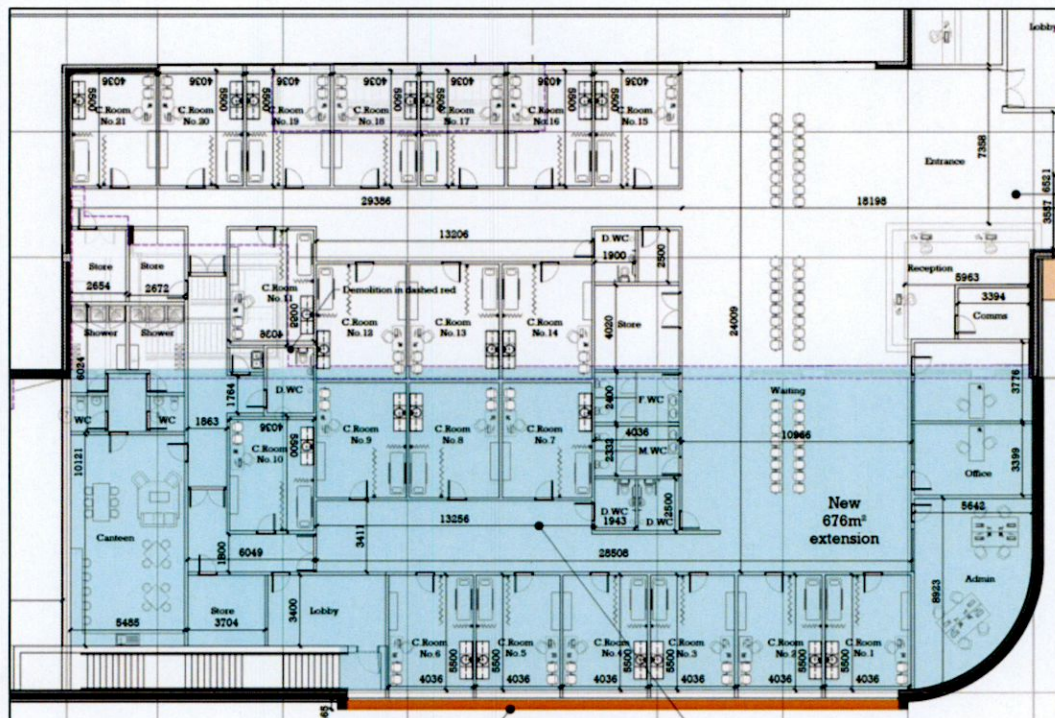
	outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community;	it will not have a noticeable or measurable impact on any other centre.	
6	Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term.	This is not relevant to District Centres which do not have defined Primary Retail areas.	✓
7	Ensure a high standard of access both by public transport, foot, and private car so that the proposal is easily accessible by all sections of society; and/or link effectively with an existing city/town centre so that there is likely to be commercial synergy ⁵ .	The intention of the application is built on the attractiveness of the centre as a district centre for local services for local people. The centre will bring a better range of services within walking and cycling distance of the catchment.	✓
Source: RPG 2012			

⁵ Note the RPG 2012 expresses the last two tests in the alternative

6.0 Other Planning and Environmental Issues:

Development Management – Health Centre

The proposed health centre at first floor extends to 790sqms and will have 21 Consultation rooms with ancillary services for staff and visitors.



The Development Management section of the Development Plan set out the following checks. These are designed for new build, segregated centres so only some are relevant to this proposed centre that is part of a wider, mixed use, community focal point. (We note that this is not a Primary Care Centre (PCC)). Our comments are included in blue text below:

Large medical centres, including Primary Care Centres (PCC) and group medical practices will be favourably considered in town, district, and village and in local centres where appropriate. The Council supports the provision of primary care facilities in accordance with the HSE standard of one facility per 7,000-10,000 population. The application is compliant as it is located in a designated District Centre.

All planning applications for health facilities including medical practices and primary care centres should include full details to allow an understanding of the nature and extent of the proposed development, including the following: Details of proposed medical or related professional activities (e.g. GP, dentist, physiotherapist, etc.);

- Any associated commercial activity (e.g. pharmacy, etc.); There is currently a dispensing pharmacy in the centre (O.D.C Pharmacy).
- Proposed number of practitioners and support staff; generally, where these figures are not known at the application phase, a general density based on sources in the UK (Wiltshire.gov.uk) estimate circa 40sqms per employee for health facilities. This equates to circa 20 jobs. The figure may be higher, but we have no specific figures at this time.
- Intended hours of operation; opening hours will be no greater than the opening hours of the overall centre.
- Confirmation of support from HSE (in the case of Primary Care Centres); à Mobility management plan (in the case of large Primary Care Centres). An MMP has been included in the NRB Traffic Statement.

Location, siting, and design should take account of the following elements:

- Location that maximises accessibility to public transport, walking and cycling; the centre is already in a location proximate to public transport routes. Details of alternative modes of transport are provide in the MMP at Appendix J of the NRB Transportation Assessment Report.
- Architectural design that adds visual interest and sense of place; not directly relevant to this health centre as this is not a new build, standalone facility.
- Inclusion of universal design principles; The centre will be accessible to all. The addition of the ramp at the southern entrance is specifically to address this matter. The centre in general is accessible by all.
- Incorporation of climate action measures including siting and design to take advantage of solar gain and the use of renewable energy and technologies (solar and wind power, heat pumps, etc.): not directly relevant to this health centre as this is not a new build, standalone facility.

Traffic Impact Assessment

A detailed Traffic Impact Assessment has been prepared for the proposed development by NRB Consulting Engineers Ltd. This confirms there are not traffic impact issues arising. A Stage 1 Road Safety Audit has also been carried out and is included in the application pack.

Cycle parking is introduced to the development. The new components that will generate staff are the health centre and the gym on First floor. As the proposed floor plans clearly show, the is ample shower and changing facilities proposed in both these new commercial uses. The applicant has complied with this requirement. We have not allowed for an increase in more than ten staff within the Dunnes Stores unit and as that is a established use (not "new") then this policy should not be applied.

Environmental Impact Assessment

Not applicable in this case. The proposed development constitutes a sub-threshold development and would not give rise to any significant impacts.

Protected Structures/ACA's

There are no Protected Structures on or close to the site. The site is not located within, adjacent or abutting an ACA.

Foul, Surface, and Potable water

Please refer to the Services Design Report and Drainage Plans prepared by ORS.

Operational Phase – Opening Hours/Serviceing

The centres hours of operation will remain unchanged.

7.0 Conclusions

We consider the proposed development to be an entirely policy and objective compliant development. It will introduce new jobs; better local services; a more coherent retail offer at ground floor; greater sustainability through green roof technology; cycle parking and showers for staff.

The proposed, non-speculative development, by Better Value Unlimited Company is for an extension to the Kilnamanagh Shopping Centre (a designated District Centre). The development includes a modest increase in sales space and the introduction of community facilities: Health centre and gym uses at first floor level. It is a suitable form of development for the following reasons.

- **Address National Policy objectives to build within the Urban Footprint on underused, brownfield sites:** the proposal will directly address National, Regional and Local Policy to focus new development on centrally located; underused; brownfield sites. This accords closely with NPF11.
- **Addressing Local Planning Policy:** the application comprehensively complies and addresses both policy and objectives for additional services in a designated District Centre location.
- **Opening and enlivening the centre to the wider area:** The proposed development will visually open the centre to the wider area with an extensive glazed façade significantly enhancing visual connectivity with the wider area.
- **Connections to the wider community:** The mixed nature of the proposed development will create stronger links between the centre and local community it serves.
- **Jobs:** The proposed development will create at least 30 new jobs in the Health Centre and Gym facilities.
- **Impact:** The objectives for District Centres in the new Development Plan are fully adhered to and the development can be accommodated without any adverse retail impact on any centre above Kilnamanagh in the County Retail Hierarchy.

APPENDIX 1

PLANNING HISTORY SUMMARY

No.	Ref Number	Address	Applicant	App Type	Proposal	Date Received	Decision	Final Grant Date	No. Conditions
1	SD13A/0009	ODC Chemists, Unit 4A & 5, Kilnamanagh Shopping Centre, Tallaght, Dublin 24	SOPI ODC Ltd.	Permission	Retention of amalgamation of two retail units into a single retail unit (143sq.m.).	25/01/2013	GRANT PERMISSION FOR RETENTION	29/04/2013	3
2	SD06A/0850	Kilnamanagh Shopping Centre, Mayberry Road, Dublin 24	Dunnes Stores Limited	Retention	Retention of additions to and the change of use of parts of the shopping centre including alterations to the previously permitted redevelopment scheme (Reg Ref S00A/0873) comprising: the addition of 567 sq m to the grocery stockroom area of the anchor store at first floor level (of which some 382 sq.m predated but was not shown in the plans and particulars forming Reg Ref S00A/0873); the addition of 543 sq.m to the storage area of the anchor store at 2 no. new mezzanine levels; the change of 149 sq.m gross unit shop convenience use to unit shop non - retail service use, 139 sq m grocery stockroom use to anchor convenience use, 26 sq. m unit shop circulation use to anchor comparison use at ground floor level; minor extension to three entrance lobbies and a fire escape door; associated alterations consisting of 2 no. new exit doors on the northern elevation and reduction of the building footprint on part of the western elevation resulting in an overall reduction of 16 sq.m to what was original permitted. The total mall floorspace of the shopping centre is 11,791 sq.m	04/10/2006	GRANT PERMISSION FOR RETENTION	19/01/2007	5
3	SD06A/0095	Kilnamanagh Shopping Centre, Mayberry Road, Dublin 24.	Dunnes Stores Ltd	Permission	(1) Change of use of existing first floor offices, 1528sq.m., and ground floor entrance hall, 118sq.m., to retail use; (2) minor alterations to north, east and west elevations; (3) 28no. additional carparking spaces.	15/10/2006	GRANT PERMISSION	12/12/2006	6
4	SD02A/0495	Dunnes Stores Ltd, Kilnamanagh Shopping Centre, Mayberry Road, Tallaght, Dublin, 24	Dunnes Stores Ltd.	Permission	A) Relocation of existing internally illuminated centre sign on south elevation; B) New internally illuminated 'Totem Pole' sign to existing southern boundary; C) Relocation of previously approved external signage to south elevation (plan no S00A/0873)	21/08/2002	GRANT PERMISSION	14/01/2003	3
5	SD02A/0170	Kilnamanagh Shopping Centre, Mayberry Rd, Tallaght, D. 24.	Dunnes Stores Ltd	Permission	Elevation alterations to east elevation, comprising 2 no. new glazed windows at ground floor level to previously approved planning permission Reg. Ref. S00A/0873.	25/03/2002	GRANT PERMISSION	03/07/2002	4
6	S00A/0873	Kilnamanagh Shopping Centre, Mayberry Rd, D.24	Dunnes Stores Ltd	Permission	(a) Demolition of part of existing shopping centre. (b) New construction to include 2 no. new retail units. Reconstruction of existing shopping centre in new configuration and new first floor offices. (c) Elevational alterations to include new external cladding, new entrances and signage. (d) Reconfigured car-parking.	20/12/2000	GRANT PERMISSION	26/07/2021	13

APPENDIX 2

TPA RETAIL IMPACT ASSESSMENT – SD06A/0095

Submission to South Dublin County Council

Retail Impact Statement

prepared on foot of a Request for Additional
Information Reg. Ref. SD06A/0095

(Issued: 7th April 2006)

prepared in respect of

**A Proposed Change of Use at Kilnamanagh
Shopping Centre, Mayberry Road, Dublin 24**

prepared on behalf of

Dunnes Stores Limited
Beaux Lane House
Mercer Street Lower
Dublin 2

by

SD06A/0095

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in association with

GAMMA Limited, Demographic Consultants
**Kavanagh Tuite, Architects Designers and Project
Managers**

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EXECUTIVE SUMMARY

The Subject Application involves the addition of an extra 1,371 sq m net of comparison floorspace.

This additional floorspace will generate an estimated €9.1m per annum in retail turnover.

The scale and composition of the floorspace proposed is consistent with the designation of Kilnamanagh as a Level 3 District Centre.

The proposed development will not offer the scale of attraction as a stand alone comparison shopping destination. Rather it will improve the effectiveness of Kilnamanagh District Centre in providing complementary comparison retail floorspace to its existing convenience offer.

Our bespoke catchment area, population forecasts and capacity assessment indicate a surplus of comparison expenditure for the proposed development.

There will be no retail impact on Tallaght Town Centre as a result of the proposed development.

Our assessments indicate that whilst the Subject Application will increase the attraction of Kilnamanagh District Centre for local residents it will not attract a high proportion of shoppers from Tallaght Town Centre or other centres. This is primarily due to the scale of Tallaght Town Centres attraction, the limited floorspace proposed in the Subject Application and its location as an extension of an existing District Centre retail offer. As a result a significant increase of additional consumer numbers is not envisaged.

1.0 INTRODUCTION

This Retail Impact Statement (RIS) is submitted on behalf of the Applicant, Dunnes Stores Limited. It provides a response to the Request for Further Information (RFI) items 1 (a) and 1 (b) issued by South Dublin County Council on 7th of April 2006 (Reg Ref SD0GA/0095).

The RIS has been prepared by Tom Phillips + Associates. A separate Planning Application for Retention Permission was submitted to South Dublin County Council on Wednesday, 4th October 2006 in respect of Item No. 3 of the Request for Additional Information.

1.1 Assessment Criteria

This RIS has been prepared in accordance with the advice provided by the Department of the Environment Heritage and Local Government (DEHLG) in the *Retail Planning Guidelines for Planning Authorities* published in 2000 and revised in January 2005. The *Retail Planning Guidelines* (RPGs) require that an RIS examine the potential retail impact and cumulative impact of new retail developments on the vitality and viability of existing centres to identify any adverse impacts. The Guidelines require that the following criteria be addressed in the assessment of retail impact and it be demonstrated whether or not the proposal would:

- (i) Support the long term strategy for town centres as established in the development plan and not materially diminish the prospect of attracting private sector investment into one or more towns;
- (ii) Cause an adverse impact on one or more town centres, either singly or cumulatively with recent developments or other outstanding planning permissions, sufficient to undermine the quality of the centre or its role in the economic and social life of the community;
- (iii) Diminish the range of activities that a town centre can support;
- (iv) Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;
- (v) Ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society; and
- (vi) Link effectively with an existing town centre so that there is likely to be commercial synergy."

These criteria are restated as the criteria against which development should be assessed in the Retail Planning Strategy for the Greater Dublin Area. Therefore, they are used as the framework within which the conclusions of this RIS are reviewed.

The RIS will demonstrate that the proposal will **not** have an adverse impact on Kilnamanagh or Tallaght Town Centres. This will be proven through both quantitative and qualitative assessments. The approach to both is summarised below.

1.2 Qualitative Assessment

In order to determine whether there will be any impact and to better understand the role of the proposed floorspace on the existing offer, it is important that the nature and vitality of Kilnamanagh is understood. This is achieved through health checks as guided by Annex 2 of the *Retail Planning Guidelines*. Annex 2 provides a range of indicators that should be incorporated in a health check. However, for smaller centres – such as Kilnamanagh – some of these indicators are not wholly applicable. As a result due regard is also given to factors such as the type and quantum of existing floorspace and role in the retail hierarchy.

1.3 Quantitative Assessment

Our capacity and retail impact assessments utilise the information derived from the following methodology:

- Establishing the retail turnover of the proposal;
- Defining the retail catchment and estimating current and potential expenditure available;
- Calculating the turnover of the centres within the catchment area that could potentially be affected by the development;
- Estimating the potential capacity for additional floorspace within the catchment area; and
- Assessing the trade diversion, retail impact and cumulative impact on existing centres in the catchment area.

1.4 Glossary of Terms

A number of terms are commonly used throughout this RIS. For the sake of clarity definitions of these terms (derived from the *Retail Planning Guidelines for Local Authorities, 2000, revised 2005*) are provided below:

- **Total Mall Floorspace (TMF)** - internal area (measured from inside walls) of the shopping centre including the semi-covered mall/street, gross retail area of the units, other uses (such as the gym and crèche), floorspace devoted to incidental activities (including storage and staff facilities), entrance space, administrative office, toilets, lifts and escalators and internal walkways.
- **Gross Retail Area (GRA)** - total floorspace (measured from inside the shop walls) which is let to retailers. i.e. sales space, plus storage space, offices, toilets, canteen and circulation space.
- **Net Retail Sales Area (NRSA)** - the area of a shop or store which is devoted to the sales of retail goods and the provision of non-retail services (including the area devoted to checkouts).

The quantum of floorspace devoted to non-retail services is **not** relevant to the assessment of the retail impact of a proposed development. As such the Net Retail Floorspace of the proposal is defined in this RIS as the Net Retail Sales Area devoted to the sale of comparison and convenience goods.

1.5 Types of Retail Goods

The definitions outlined below follow the definitions given in Annex 1: Glossary of Terms of the RPGs:

Convenience

- food
- alcoholic and non-alcoholic beverages
- tobacco
- non-durable household goods

Comparison

- clothing and footwear
- furniture, furnishings and household equipment (excluding non-durable household- goods)
- medical and pharmaceutical products, therapeutic appliances and equipment
- educational and recreation equipment and accessories
- books, newspapers and magazines
- goods for personal care and goods not elsewhere classified

Bulky Goods

Comparison goods can be further subdivided into bulky goods and non bulky goods. Annex 1 of the RPGs define bulky goods as:

"Goods generally sold from retail warehouses where DIY goods or goods such as flatpack furniture are of such size that they would normally be taken away by car and not be manageable by customer travelling by foot, cycle or bus, or that large floor areas would be required to display them e.g. furniture in room sets, or not large individually, but part of a collective purchase which would be bulky e.g. wallpaper, paint."

Non-Retail Services

Although not defined in the RPGs, non-retail services refer to uses such as the following:

- hairdressers
- restaurants/ cafes/ sandwich outlets
- public houses
- travel agents
- banks, building societies, credit unions
- dry cleaning
- post office
- video/dvd rental
- beauty salon.

1.6 Structure of the Report

The Retail Impact Statement is set out as follows:

- **Section 2:** establishes the details and retail turnover of the proposed development.
- **Section 3:** provides the policy context and framework for the proposal.
- **Section 4:** establishes the catchment area and constructs population forecasts.
- **Section 5:** undertakes a health check appraisal of Kilnamanagh
- **Section 6:** provides an estimation of capacity for additional retail floorspace in the catchment area.
- **Section 7:** assesses the trade diversion, retail and cumulative impact of the proposal.
- **Section 8:** summarises the findings and conclusions of the retail impact statement.

2.0 DETAILS AND ESTIMATED TURNOVER OF THE PROPOSAL

This Section sets out the overall retail floorspace contained in the proposal and estimates the turnover generated by such a quantum of floorspace. These figures will be used later in our capacity and retail impact assessments.

2.1 Details of the Application

The proposed development comprises the following:

- A change of use of existing first floor offices and ground floor entrance hall to retail uses. This comprises an additional 1,714 sq m gross of comparison floorspace.

A schedule of additional retail floor areas is attached in Table 2.1.

Table 2.1: Schedule of Additional Retail Floor Areas (sq m)

Location	Gross Retail Area	Net Retail Sales Area (NRSA)*
Dunnes Stores:		
Additional Comparison	1,714	1,371
Total Additional Retail Floorspace	1,714	1,371
Note: *NRSA is calculated following the standard net to gross ratios of 80% for comparison floorspace.		

Source: Tom Phillips + Associates (2006) from Architect's Drawings

A schedule of the Total Mall Floorspace of the existing Shopping Centre is set out in Table 2.2.

Table 2.2 Schedule of Total Mall Floorspace as Existing Shopping Centre

Schedule of Total Mall Floorspace		Existing Floorspace/sq m
Ground Floor	Net Anchor Convenience	3,083
	Anchor Convenience Circulation	268
	Anchor Convenience Service/Storage	924
	Net Anchor Comparison	1,667
	Anchor Comparison Circulation	383
	Anchor Comparison Service/Storage	453
	Total Unit Shop Convenience	0
	Total Unit Shop Comparison	527
	Total Unit Shop Non-Retail Services	328
Mezzanine/ Storage Floor	Total Unit Shop Circulation	681
	Comparison Mezzanine	343*
	Mezzanine Metal Deck	200*
First Floor	Grocery Stockroom on First Floor Level	185
	Office Area the subject of SD06A/0095	1,528
	Administration/Office/Canteen /Storage Area (including staircore)	839
	Grocery Stockroom (over deli/bakery)	382**
Total Mall Floorspace		11,791
<p>Note: * Areas for which retention planning permission is currently being sought under a separate Retention Planning Application lodged with South Dublin County Council on Wednesday, 4th October 2006</p> <p>** Area most likely to be already existing prior to 2001, however, planning permission is currently being sought for its retention under the Retention Planning Application lodged with South Dublin County Council on Wednesday, 4th October, to ensure transparency</p>		

Source: Kavanagh Tuite Architects Schedule of Areas dated 31st August 2006 and 2nd October 2006 and Tom Phillips + Associates Town Planning Consultants

Please note that Retention Application which was lodged with South Dublin County Council on Wednesday, 4th October 2006 does not contain any additional net retail floorspace, therefore, it does **not** require separate consideration or inclusion as part of this RIS.

2.2 Design Year

Having regard to the amount of time required for completion of the planning process, construction, and the establishment of a trade and market presence, it is estimated that it will take approximately four to four and half years (50 – 54 months) for the proposed development to establish a pattern of trading. The design year is therefore assumed to be 2011. This is illustrated in Table 2.3.

Table 2.3 Estimation of Design Year

Phase	Duration (Months)
Securing Planning Permission Planning via the Planning Authority (and potentially An Bord Pleanála)	12
Construction Period	12 - 18
Establishment of Trade Market Presence	24
Total	50-54

Source: Tom Phillips + Associates (2006)

2.3 Turnover of Additional Retail Floorspace

As set out above, the proposed extension of retail floorspace includes comparison floorspace only. Table 2.4 below sets out the estimated turnover of the additional 1,371 sq m net comparison floorspace.

Table 2.4 Estimated Turnover of the Proposed Development (€m, 2002 prices)

Retail Uses	Gross Retail Area (m ²)	Retail Area		Estimated Turnover €m	
		Net Retail Sales Area (m ²)*	Turnover Ratio (€/m ²)**	Convenience	Comparison
Dunnes Stores					
Comparison	1,714	1,371	6,620	-	9.1
Total Retail	1,714	1,371	-	-	9.1
Note: * We utilise an industry standard gross to net ratio of 80%					
** Turnover Ratio for Medium/Low Comparison Goods					

Source: Tom Phillips + Associates (2006) from Architect's Schedules

To derive the retail turnover of the development, all floorspace figures have been converted from gross to net and accepted retail turnover ratios have been applied. This shows a total estimated turnover of €9.1m

It must be noted that the monetary values in Table 2.4 are quoted in **2002 prices** so that they are comparable with the expenditure and turnover figures that are set out in the later sections of this report. This is the latest year for which disaggregating information is available for the Annual Services Inquiry (ASI) and the County Incomes and Regional Gross Domestic Product publications, both published by the Central Statistics Office (CSO). Therefore, **2006 is adopted as the base year** of this RIS.

3.0 STRATEGIC POLICY CONTEXT

3.1 Introduction

The subject site lies within the administrative boundaries of South Dublin County Council. Accordingly, the *South Dublin Development Plan (County Plan) 2004 - 2010* is the relevant statutory Development Plan. Due regard is also given to the relevant policy guidance provided in the:

- *Retail Planning Guidelines* published by the Department of the Environment, Heritage and Local Government (DoEHLG), 2000 and amended 2005.
- *Retail Planning Strategy for the Greater Dublin Area* published in conjunction with relevant local authorities, 2001.

3.2 Retail Planning Guidelines

The *Retail Planning Guidelines (RPGs)* identify that the growth of the Irish economy since the mid 1990's has increased retail expenditure and pressure for retail development.

The RPGs predict that a continuation of this economic growth will generate a requirement for additional retail floorspace. The Guidelines (Paragraph 21) emphasise that *"the challenge to be faced is how to accommodate the additional development that is projected, to be required in a way which is efficient, equitable and sustainable"*. In the following paragraphs, we identify the RPGs guidance relevant to the proposal under the following headings:

- i. Role and Concept of a District Centre; and
- ii. Assessment of Applications for Retail Development - District Centres.

3.2.1 Role and Concept of a District Centre

District Centres are characterised in the RPGs as being located:

"Within the built up area of major conurbations or in the suburbs of large towns. They are usually anchored by a large food store and contain a range of unit shops and non retail service outlets (such as banks, post office or hairdressers). They perform an important retail function for the community living within a 15-20 minute drive time of the site" (paragraph 71).

The roles of town and district centres are clearly set out in paragraph 28 of the RPGs:

"Town centres, together with district centres and major village centres serving rural areas provide a broad range of facilities and services and act as a focus for the local community. In this guidance the term "town centre" is used to refer to district centres as well as centres of smaller settlements".

With regard to the retailing element of district centres the RPGs acknowledge that retailing should continue to remain the primary function of such centres. Paragraph 29 of the RPGs states:

"Shopping Provision is a key component of town (and district) centres, and makes a major contribution to their vitality and viability. It is important therefore that they retain retailing as a core function. Considerable investment has already taken place in town (and district) centres and planning policies should seek to sustain and enhance their role including new retail development and other uses".

The proposed development is located in a district centre which is consistent with the concept and role of district centres as set out in the RPGs.

3.2.2 Assessment of Applications for Retail Developments

The RPGs establish two key principles against which retail development should be assessed:

1. Location of Development: The preferred location for a new retail development where practicable and viable, is within a town centre (including district or major village centres). In this regard, the proposed development is located within the RPGs description of a town or district centre location (Paragraph 58).
2. Impact on Vitality and Viability: In making an application for planning permission for retail development which local authorities consider to be large scale in relation to existing town or district centres, the onus is on the applicant to demonstrate that there will not be a material adverse impact on the vitality and viability of any existing or nearby centres. In submitting evidence in relation to retail impact the applicant is required to address six criteria set out in paragraph 65 of the RPGs. The proposed development is assessed against these criteria in Section 8 of this RIS. As detailed in Section 7, there is no retail impact from the proposed development which would be detrimental to the vitality and viability of existing centres.

3.3 Retail Planning Strategy for the Greater Dublin Area, 2001

The Retail Planning Strategy for the Greater Dublin Area (GDA Retail Strategy)) has the overall aim of ensuring the provision of adequate retail floorspace in accordance with projected population and retail expenditure growth for the period up to 2011.

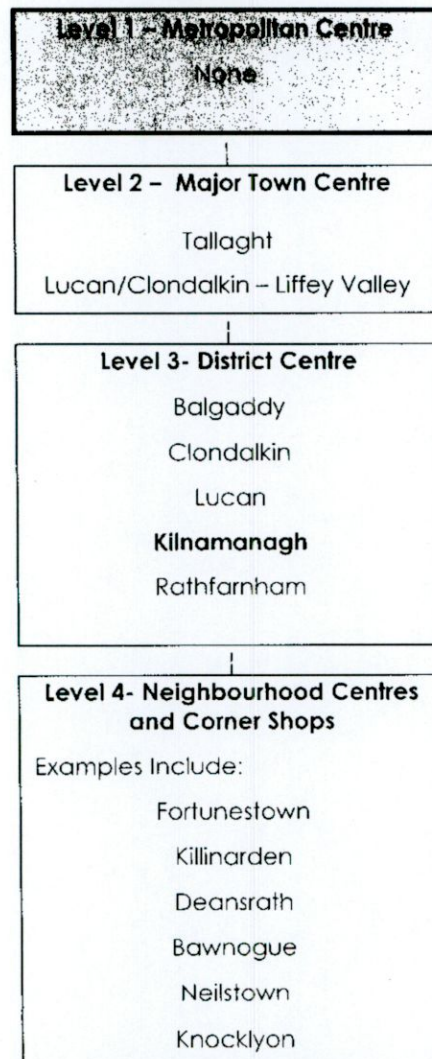
3.3.1 Retail Hierarchy

The GDA Retail Strategy divides the Greater Dublin Area into Metropolitan and Hinterland areas. The entirety of South Dublin is located in the Metropolitan Area. Following closely the definition of District Centres contained in the RPGs, the GDA Retail Strategy in paragraph 5.15 defines Town and District Centres as being:

"Smaller than the Major Town Centres and usually anchored by convenience shopping, offering lower order comparison retailing and having a more limited service role. Typically they will serve catchments within a 10 to 15 minutes drive time of the centre, the size of the catchment being determined by the density of the population".

The GDA Retail Strategy retail hierarchy for South Dublin is presented in Figure 3.1 below.

**Figure 3.1 GDA Retail Hierarchy
South Dublin**



Source: Retail Planning Strategy for the GDA (2001)

Kilnamanagh is identified as a District Centre – a designation shared with Balgaddy, Clondalkin, Lucan and Rathfarnham. It should be noted that Tallaght is defined as being only one of two Major Town Centres in the South Dublin area (the other being Liffey Valley) thus reflecting the scale and quantum of the retail offer at this location.

3.3.2 Applicable Floorspace

The GDA Retail Strategy sets out the appropriate shopping provision for each level of the retail hierarchy. For District Centres such as Kilnamanagh appropriate floorspace encompasses lower order comparison, supermarkets and superstores. The proposed development, for lower order comparison floorspace, is consistent with this guidance.

For Major Town Centres such as Tallaght this is expanded to include middle and higher order comparison floorspace.

3.4 South Dublin County Development Plan, 2004-2010

The current South Dublin Development Plan (County Plan) covers the period from 2004 to 2010. The guiding objective of the County Plan is to set out an overall strategy for the proper planning and sustainable development of the County.

3.4.1 Retail Hierarchy

The County Plan sets out a County Retail Hierarchy which is based directly on the hierarchy contained in the GDA Retail Strategy set out in Figure 3.1 above. Kilnamanagh is again defined a District Centre along with Balgaddy, Clondalkin, Crumlin, Lucan, Newcastle Road, Rathfarnham, Adamstown and Verschoyle/Carrigmore. As noted above, the type of floorspace proposed in the Subject Application is consistent with the scale of a district centre and with the applicable floorspace for such centres as set out in the RPGs.

The County Plan acknowledges the sub regional attraction of Major Centres such as Tallaght and further notes that:

"The synergy of the range of established uses in the Tallaght Town Centre area generates a special status for Tallaght as the primary commercial centre in the county. It is desirable that this status be maintained and enhanced whenever practicable" (paragraph 6.1.2.iii).

3.4.2 Indicative Floorspace Potential

The County Plan (utilising data from the GDA Retail Strategy) identifies an indicative floorspace requirement of between 14,000 and 20,000 net sq m net of comparison floorspace in 2011. This relates to centres outside of the Major Centres of Tallaght and Liffey Valley.

However, given that this data:

- i. Relates to the County as a whole and does not take into account the specific localised attributes of a District Centre; and
- ii. Is based on out of date and obsolete baseline data.

We subsequently construct a bespoke capacity assessment for the Subject Application – this is set out in Section 6 of this RIS.

3.4.3 Criteria for Retail Developments and Testing for Retail Impact

Section 12.5.1 of the County Plan sets out the criteria against which new retail development should be assessed against. These specifically set out its support of ensuring the retail health and self sufficiency of level 3 district centres by *'supporting the long term strategy for the level 2 and level 3 centres and not materially diminish the prospect of attracting private sector investment into one or more of the centres'*. This is based on the criteria set out in paragraph 65 of the RPGs. A comparison impact assessment is contained in Section 7 of this RIS with Section 8 containing a full appreciation of the Subject Application against the RPGs and County Plan criteria for retail development.

3.5 Conclusions – Need for the Proposal

The proposed development does not offer the quantum of retail floorspace to compete with Tallaght Town Centre. Rather, the Subject Application seeks to enhance the comparison retail offer of Kilnamanagh District Centre in order to better meet the needs of its immediate hinterland population.

Overall, the proposed development is consistent with the provisions of the County Plan which seeks to promote local service provision in Level 3 District Centres such as Kilnamanagh. The proposal will help Kilnamanagh attain the level of service provision required under its designation as a District Centre in the County Retail Hierarchy.

In summary, we contend that the proposed development is consistent with the aims, objectives and policies of all strategic policy guidance. Firstly, the proposed development will help meet the retail and service needs of a growing local community and would serve as a catalyst to continued growth. Secondly, the quantity, quality and configuration of the proposed retail floorspace provision will ensure that the proposed development is commercially viable but not threatening to the vitality and viability of Tallaght Town Centre or other similarly designated District Centres.

We specifically highlight that the Subject Application is consistent with the following strategies for retail development set out in the County Plan (Section 6.2):

- i. Ensure that the provision of additional retail floorspace relates to the hierarchy of retail centres adopted and is compatible with the scale, character and function of receiving centres;
- ii. Maintain and strengthen the retail character of key shopping areas of existing centres, while protecting and/or improving the amenities of surrounding areas;

- iii. Ensure that there is sufficient retail floorspace in the county and that this floorspace is located in an efficient, equitable and sustainable manner having regard to the *Retail Planning Guidelines* and to the *Retail Planning Strategy for the Greater Dublin Area*; and
- iv. Maintain the dominant retailing and Major Centre functions of Tallaght Town Centre as the County Town.

4.0 CATCHMENT AREA AND POPULATION FORECASTS

4.1 Introduction

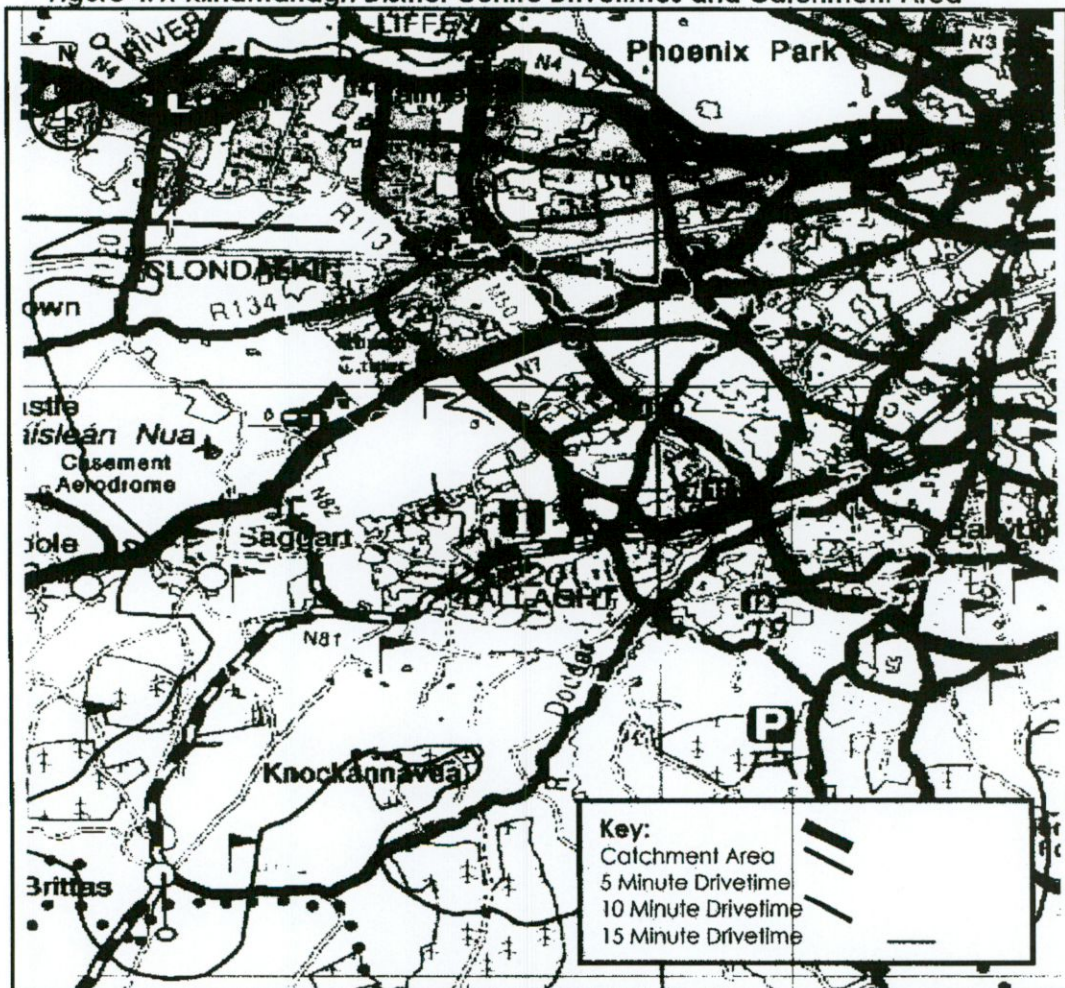
A key component of the RIS is the identification of what the expenditure capacity for additional retail floorspace in the catchment area of a proposed development is. Important inputs into this assessment are:

- I. Definition of the retail catchment area;
- II. Historic Population Trends; and
- III. Population projections.

4.2 Definition of Retail Catchment Area

Definition of the catchment area of a retail proposal is a matter of judgement informed by experience and the performance of other centres. It refers to the area within which most of the turnover of a proposal will be drawn. Thus, it depends on factors such as the scale of the development, the distribution of population, travel times and the location and offer of competing centres. It is also informed by health check appraisals. The catchment area and associated drive times are illustrated in Figure 4.1.

Figure 4.1: Kilnamanagh District Centre Drivetimes and Catchment Area



Source: Tom Phillips + Associates (2006) and GAMMA (2006)

As noted in Section 2, the RPGs define District Centres as playing an important retail function within a 15-20 minute drive time of the site. However, given the location of Kilnamanagh District Centre the catchment area has been adjusted and reoriented in an eastwards and northwards direction to take account of:

- The proximity of the centre to Tallaght Town Centre and associated retail developments on the Belgard Road (Woodies, Belgard Road Retail Park). As a result the western and southern boundaries of the catchment are set very close to the District Centre reflecting the draw and offer of this major town centre.
- The northern and eastern boundaries of the catchment area remain close to the 10 minutes drive time. This reflects the relative attraction of the District Centre having regard to its accessibility from the Greenhills Road and the Ballymount Road. This also reflects the relative paucity of modern format convenience and comparison floorspace in this area.

Based on the published results of the 2002 Census at electoral division (ED) level, GAMMA provided us with the population within the catchment area. Therefore, 2002 provides the initial base for demographic forecasting. Using 2002 as a starting point, informed by the latest demographic information available, we use **2006 as the base year** in the preparation of this RIS.

4.3 Historic Population Trends

Based on GAMMA's data it is possible to identify that the catchment area had a population of 28,464 in 2002. Based on GAMMA's calculations this is estimated to have risen by 6.5% in the period to 2005 to 30,315. From this it is clear to see that the catchment area has an expanding population and as such is consistent with general demographic trends in the County.

4.4 Population Projections

4.4.1 Forecasting Methodology

Population projections are constructed for the base year (2006) and the design year (2011). We apply a **targeted accelerated growth** methodology based on, where possible, specific demographic projections contained in relevant Local, Regional or State plans.

4.4.2 Population Estimates

The Tallaght Town Centre proposed Local Area Plan published by South Dublin County Council in April 2006 sets out an estimated population increase of 2.3% per annum in the period up to 2012. This is largely based on the increasing number of high density schemes in the Tallaght Town Centre and the declining average occupancy of individual housing units. However, it is important that we note that the defined Kilnamanagh catchment area is predominantly characterised by older, lower density residential schemes and as such can not be anticipated to increase at the same rate as Tallaght Town Centre and surrounds.

As a result we estimate that in the period 2006 – 2012 the population of the defined Kilnarnagh catchment area will rise by 1.5% per annum. This broadly reflects a continuation of the estimated population growth in the period 2002 – 2005. This is presented in Table 4.1 below.

Table 4.1 Population Estimates

Year	Average Rate (%)	2006	2011
Catchment Area	1.5	30,770	33,148

Source: Tom Phillips + Associates (2006)

5.0 QUALITATIVE APPRAISAL

In accordance with Annex 2 of the RPGs, a qualitative appraisal, or health check survey, of Kilnamanagh was undertaken as part of this RIS. This health check assessment plays a very important role in helping to identify current retail patterns in the area in addition to providing valuable data on the scale of existing retail and service provision.

5.1 Kilnamanagh

Kilnamanagh is located north east of Tallaght Town Centre bounded by the Belgard Road to the west and the M50 Motorway to the east. Data provided by GAMMA Ireland indicates a population of 19,137 within a five minute drive time of Kilnamanagh District Centre based on data contained in the 2002 census. As noted, Kilnamanagh is designated as a Level 3 District Centre in the GDA Retail Hierarchy. Other settlements in South Dublin to attain this designation are Balgaddy, Clondalkin, Lucan and Rathfarnham. Kilnamanagh's place in the retail hierarchy of South Dublin is reconfirmed in the South Dublin Development Plan (2004 – 2010) which also designates Kilnamanagh as a Level 3 District Centre.

5.1.1 Diversity of Uses and Retailer Representation

Kilnamanagh District Centre provides a range of retailing and non retail services to its immediate surrounding hinterland. The centre is anchored by Dunnes Stores which contains both food and non – food retail floorspace. In addition to the anchor store, the centre contains additional comparison floorspace in the form of a small pharmacy and a discount store selling a variety of comparison goods. Additional floorspace in the District Centre comprises a travel agents and a café. The integral role the centre plays in the wider local community is evidenced by the fact that the Kilnamanagh Post Office is also located there. At the time this healthcheck was being undertaken two vacant units were available for rent in the District Centre comprising 130 sq m of retail floorspace approximately.

Kilnamanagh District Centre – both in terms of its uses and retailer representation – closely follows the definition of a District Centre set out in Paragraph 71 and Annex 1 of the *Retail Planning Guidelines*.

5.1.2 Pedestrian Flows and Accessibility

A high degree of pedestrian flows were witnessed in the District Centre at the time this health check was being undertaken. These inflows were concentrated primarily on the post office, pharmacy and Dunnes Stores. A high level of pedestrian borne activity was also witnessed accessing the centre from the pedestrian access points leading to Treepark Road and Treepark Avenue – a fact further highlighting the integral role of the District Centre in providing retail and service provision for its immediate hinterland population.

Car borne access to the District Centre is gained via Mayberry Road and Treepark Road with public transport provision primarily based on a variety of Dublin Bus routes including route numbers 50, 77 and 202. A Red Luas Line stop is also accessible at Kingswood, approximately 700 meters north of the District Centre. The centre provides adequate car parking facilities for car borne shoppers and provides no serious impediments regarding traffic flow or congestion.

5.1.3 Environmental Quality and Physical Quality

Physically, the area of Kilnamanagh is predominantly characterised by maturing housing estates mainly comprising a semi detached streetscape. These areas are centred on a large open space area located some 250 meters north of the District Centre, adjacent to the local school and church. South of Mayberry Road, a similar streetscape exists with the areas in proximity to the Belgard Road and Greenhills Road attaining a more industrial usage due to proximity to the N7 and N81 National Primary Routes.

5.1.4 Recent Development

Apart from the District Centre, recent development in Kilnamanagh has been limited due to the predominantly residential usage of this area. Retail Development has been almost entirely focused on the Tallaght area – including continuing expansion of the Square Shopping Centre, the Belgard Road Retail Park and further development of the town centre.

5.2 Conclusions

From the health check, it is clear that Kilnamanagh District Centre provides a range, diversity and quantum of retail and non retail uses which predominantly serves its surrounding hinterland. As a District Centre it provides a local service centre that is readily accessible by pedestrians, public transport and private car. Judging on the level of activity within the centre at the time this health check was being undertaken it clearly performs an important retail function. The proposed development, in seeking to increase the centres comparison retail offer would offer the quantum of comparison floorspace better able to meet the needs of its surrounding hinterland population.

6.0 CAPACITY ASSESSMENT

6.1 Role and Scope

This Section of the RIS seeks to establish the capacity for retail floorspace in the catchment and is based on the expenditure available in the catchment area. It is important to note that this assessment alone does not determine whether or not a development will have an adverse retail impact on existing centres. Rather it provides a broad indication of the general requirement for retail floorspace in the catchment given population and expenditure growth estimates.

Given that the Indicative Floorspace Potential for South Dublin contained in Chapter 6 of the County Plan is based on information contained in the 2001 GDA Retail Strategy – this baseline information is now well over 5 years old – we construct a bespoke capacity assessment for the catchment area as defined in Section 4 of this RIS. This capacity assessment examines the retail requirement for comparison floorspace in the period 2006 (Current Year) – 2011 (design year of the proposed development).

6.2 Methodology

The key steps of our capacity assessment are:

- **Step 1:** Population and Expenditure Estimates;
- **Step 2:** Turnover Estimates;
- **Step 3:** Gross Additional Expenditure Potential;
- **Step 4:** Future Sources of Retail Sales – New Developments;
- **Step 5:** Turnover Efficiency; and
- **Step 6:** Capacity Assessment.

6.3 Population and Expenditure Estimates

The population forecasts in this assessment are based on those presented in Section 4. The application of these forecasts to the per capita expenditure estimates for convenience and comparison goods is presented in Table 6.1. The per capita figures are derived from disaggregated data taken from the 2002 CSO Annual Services Inquiry and from the 2002 CSO County Incomes and Regional Gross Domestic Product (GDP) statistics. As has been highlighted, all monetary values are stated in 2002 prices.

Table 6.1 Total Expenditure by the Resident Population of the Catchment Area (2002 Prices, €m)

Year	Comparison Per Capita - South Dublin (€)	Population Estimates	Comparison Total Expenditure (€m)
2006	4,041	30,770	124.3
2011	4,883	33,148	161.9

Source: Tom Phillips + Associates (2006)

6.4 Turnover Estimates

6.4.1 The Concepts of Market Share and Trade Draw

The turnover of retail outlets in the catchment area must also be adjusted to take account of market share and trade draw expenditure flows. These are defined as:

- I. **Market Share:** the proportion of the catchment areas population expenditure that is retained in the catchment area; and
- II. **Trade Draw:** the proportion of total retail expenditure in the catchment area which is derived from persons living outside of the catchment area.

It is often misinterpreted that market share and trade draw are based simply on the overall proportion of shoppers either leaving or entering the catchment area for convenience or comparison shopping purposes. However, it must be noted that market share and trade draw actually relate to actual levels of expenditure and as a result provide valuable information on shopping patterns.

6.4.2 Estimating Market Share and Trade Draw

Estimates for market share and trade draw are informed by a variety of data sources. Household and shopper surveys undertaken as part of County Retail Strategies or specific planning applications provide information on expenditure flows. There is also a degree of professional judgement derived from our experience of comparable capacity assessments. The health check undertaken as part of this RIS also provides a valuable tool in providing up to date information on the viability of centres and the existence of retail expenditure flows, both in and out of the catchment.

6.4.3 Market Share and Trade Draw Assumptions

Data from the GDA Retail Strategy highlights market share of 87% for convenience expenditure and 56% for comparison expenditure in South Dublin. This means that 13% and 44% of convenience and comparison expenditure by South Dublin residents is leaking out of the county. The GDA Retail Strategy acknowledges the significant degree of comparison leakage and states that the majority of this goes to Dublin City Centre. In relation to the proposed application, it is clear that the majority of comparison expenditure within the catchment area is spent in either Dublin City Centre due to the scale of its offer, or Tallaght Town Centre due its relative proximity. As a result we increase comparison outflows to 75% for the catchment area. This further reflects the paucity of modern format comparison floorspace in the catchment area with the exception of Dunnes Stores in Kilnamanagh. Moving forward, the proposed development will increase significantly the proportion of modern format comparison floorspace in the catchment area. However, there will still be a high degree of comparison expenditure leakage in the long term – due to the continuing improving of both the city centres and Tallaght’s comparison retail offer and the fact that the proposed development only involves an extension to existing offer. Therefore in 2011, we assume comparison expenditure outflows will decrease only slightly to 65%.

The GDA Retail Strategy illustrates trade draw of 40% for comparison expenditure. This means that 40% of the County’s comparison expenditure is derived from people living outside of the catchment area. The GDA Retail Strategy further acknowledges that the vast majority of these inflows are based on Tallaght and Liffey Valley Shopping Centres. Current comparison expenditure inflows to Kilnamanagh are estimated to be marginal (5%) given its proximity to Tallaght Town Centre and the fact that a significant proportion of the proposed development clientele will already be undertaking their main food and/or comparison shopping centre in Kilnamanagh District Centre. Therefore at 2011 we estimate that comparison inflows will remain at 5%. This indicates that the proposed development will help retain comparison expenditure within the catchment area but will not boast the quantum of additional floorspace to increase inflows from outside of the catchment area. This indicates that the Subject Application will not significantly increase car borne journeys to the District Centre, rather it will aid the retention of locally based comparison expenditure. This is discussed further in Section 8 of this RIS.

6.4.4 Projected Turnover

Table 6.2 illustrates that, with population growth and improvements in the retail offer of the Kilnamanagh catchment, the estimated turnover of the comparison outlets will increase from €32.7m in 2006 to €59.6m by 2011.

Table 6.2 Turnover of Retail Outlets in Kilnamanagh Catchment (2002 Prices, €m)

Year	Comparison	
2006		
Resident Expenditure	75%	124.3
Less Outflows		93.3
Resident Expenditure in Catchment		31.1
Add Inflows	5%	11.6
Retail Spend in Catchment		32.7
2011		
Resident Expenditure	65%	161.9
Less Outflows		105.2
Resident Expenditure in Catchment		56.7
Add Inflows	5%	32.0
Retail Spend in Catchment		59.6

Source: Tom Phillips + Associates (2006)

6.5 Gross Additional Expenditure Potential

Using the estimates of catchment area turnover highlighted in Table 6.2 it is possible to estimate the growth in spare expenditure that will occur in the catchment area. These estimates are illustrated in Table 6.3. The figures indicate that there will be an increase in comparison expenditure of €26.9m over the period 2006 – 2011.

Table 6.3 Gross Spare Expenditure Potential (2002 prices, €m)

Period	Comparison
	€m
2006 – 2011	26.9
Total 2006 - 2011	26.9

Source: Tom Phillips + Associates (2006)

6.6 Future Sources of Retail Sales

Account must also be taken of all significant extant planning permissions that exist in the catchment area. The South Dublin Development Plan (2004 – 2010) notes that significant retail developments are taken to be over 500 sq m gross for convenience floorspace and over 1,000 sq m gross for comparison floorspace. Our review of the catchment area, which is primarily characterised by residential developments, indicates no extant permissions in over these thresholds in the catchment area.

6.7 Turnover Efficiency

Account must also be taken of the impact of turnover efficiency on the existing and proposed floorspace in the catchment area. Based on the standard methodology used in RIS's and Retail Strategies we assume that convenience floorspace is already operating at near optimum efficiency. For comparison floorspace, it is assumed that turnover of efficiency growth of 1% per annum will occur. This level of turnover efficiency will capture €6.2m in the period to 2011.

6.8 Capacity Assessment

6.8.1 Applying Turnover Ratios

By applying estimated turnover ratios to the estimated gross spare expenditure capacity presented in Table 6.3, we calculate the estimated net floorspace capacity in the catchment area. All new retail developments will be modern format and will trade at significantly higher turnover ratios than that evident for some existing, older format floorspace. We reflect this fact by applying weighted new turnover ratios for comparison expenditure capacity. This takes into account that new comparison and bulky goods floorspace will include a range of outlets from large retail warehousing units to small format town centre stores. Therefore, we apply:

- i. A weighted comparison turnover ratio of €5,369 expressed in 2002 prices.

6.8.2 Net Floorspace Capacity

The net floorspace capacity assessment is presented in Table 6.4 below.

Table 6.4 Net Floorspace Capacity in Catchment Area (2002 prices, m²)

Period	Comparison
	Net sq m
2006 – 2011	3,855
Total 2006 - 2011	3,855

Source: Tom Phillips + Associates (2006)

Table 6.4 illustrates the potential for up to 3,855 sq m net of comparison floorspace in the period to 2011.

6.8.3 Capacity for Subject Proposal

It is important to set the assessment against the net comparison floorspace proposed, as set out in Section 2:

- The total net comparison floorspace of the proposal is 1,371 sq m

Based on the capacity assessment there is **sufficient capacity** for the proposed development.

As we have highlighted in our introduction to this section, the assessed capacity is not set down as a cap on what quantum of floorspace can or should be developed within a particular county or catchment area. The key issue is impact on turnover and hence the viability of a centre which is addressed in the following section.

7.0 RETAIL IMPACT

7.1 Introduction and Definition

This section of the RIS sets out the potential retail impact of the convenience and comparison elements of the proposed development on Tallaght Town Centre. **We define retail impact as occurring when a proposed new retail development drives the turnover of an established centre below its current trading levels (2006 in this case).**

Retail impact is the **key** indicator in assessing whether a proposed development will have any effect on the vitality or viability of an established centre. This is assessed against when the proposed development has established a permanent pattern of trading; in this case 2011. It should be noted that a 10% -20% retail impact on any centre is not normally considered significant when taking future income and population growth into account. For major town centres such as Tallaght, retail impact of 20% would generally be considered acceptable.

7.2 Methodology

RIS methodologies have largely evolved on the basis of experience over the past number of decades. As a result there is no established set model for testing retail impact; however certain industry conventions are accepted as forming a foundation for a sound and defensible retail impact assessment. Our methodology, therefore, follows the format set out in Annex 4 (The Assessment of Retail Impact) in the RPGs. Our retail impact assessment uses current trading levels as a benchmark against which the effects of trade diversion can be identified. This approach enables the effects of projected population and expenditure growth to be taken into account.

Estimating the level of the proposed developments turnover which will be diverted from existing retail centres poses particular difficulties, particularly in the absence of relevant household and shopper survey information. It is as a result of this fact that the town centre health check plays a hugely important role in the determination of trade diversion from established centres to the proposed development. The estimation of these patterns are also based on factors such as distance, quality of retail offer in other centres, transport links, existing shopping patterns and our experience of similar areas throughout the country.

7.3 Trade Diversion

The proposed development will strengthen Kilnamanagh as a comparison retail centre and will increase the overall attractiveness of the district centre as a whole for retailing.

The aim of this development is to better meet the needs of Kilnamanagh's immediate hinterland population. The Subject Application will marginally stem expenditure leakage from the catchment area and will increase the attraction of the centre as a destination for linked shopping trips comprising convenience and comparison elements. The retention and attraction of expenditure will at the very least sustain existing levels of spend in current floorspace and should actually benefit existing businesses given that there will be a reduced need for local people to travel elsewhere to meet an increased portion of their comparison shopping needs.

The proposed development does not offer the quantum of retail floorspace to compete with Tallaght Town Centre. Rather, the Subject Application seeks to enhance the comparison retail offer of Kilnamanagh District Centre in order to better fulfil its designation as a level 3 District Centre under the Regional and County Retail Hierarchies.

It should be remembered that the proposed development – providing extra comparison floorspace to an existing Dunnes Stores will not offer the scale of attraction as a stand alone comparison shopping destination. Rather it will improve the effectiveness of Kilnamanagh District Centre in retaining and improving the per capita comparison spend of people already undertaking their convenience shopping in the centre.

7.4 Convenience Trade Diversion and Retail Impact

Given that the Subject Application does not include any convenience floorspace a convenience trade diversion and retail impact assessment is not required.

7.5 Comparison Trade Diversion and Retail Impact

The extent of trade diversion that will occur as a result of the comparison component of the proposed development will be determined by the nature and attraction of the retail offer. The location of the Subject Application – essentially providing additional comparison floorspace in an existing District Centre indicates that a significant proportion of the revenue derived from the additional floorspace will be derived from shoppers who are already shopping in the centre. In essence, the additional comparison floorspace proposed will increase the per capita expenditure of existing District Centre shopping by increasing the attraction of linked shopping trips. As a result we estimate that 50% of the retail turnover of the proposed additional floorspace will be derived from existing District Centre shoppers.

The proximity of the District Centre to the Major Town Centre of Tallaght is also reflected in the derivation of our catchment area in Section 4. Tallaght is a regional shopping attraction and as a result will continue to attract shoppers from the Kilnamanagh area and beyond for a variety of convenience, comparison and leisure needs. A fact likely to increase as the Square Shopping Centre plans to significantly expand its retail offer and other new developments in the area come on stream. However, the Subject Application does not possess the quantum of retail floorspace to compete with Tallaght Town Centre, rather it provides for an enhancement of Kilnamanagh District Centre to better fulfil its Level 3 designation in Regional and County Retail Hierarchies.

However, as accessibility issues increase regarding Tallaght Town Centre it is likely that the enhanced Kilnamanagh District Centre will be a viable destination for a small number of shoppers undertaking basic convenience and comparison shopping trips in Tallaght Town Centre. As a result we estimate that 40% of the retail turnover of the proposed additional floorspace will be derived from Tallaght Town Centre – primarily from local residents currently comparison shopping in Tallaght.

There will be limited trade diversion from other significantly smaller centres both inside and outside of the catchment area. This reflects the small number of shoppers from the Kilnamanagh area that are currently shopping location other than Kilnamanagh and Tallaght. As a result we estimate that 10% of the retail turnover of the proposed additional floorspace will be derived from these other centres.

Overall, our pattern of trade diversion is consistent with:

- The small level of additional comparison floorspace proposed when compared to the quantum and range of comparison floorspace contained in Tallaght Town Centre;
- Ongoing growth in expenditure capacity in the catchment; and
- The location of the additional comparison floorspace as part of the existing District Centre. This provides for an increase in linked shopping trips but not a stand alone comparison shopping destination.

Table 7.1 Comparison Trade Diversion and Retail Impact, 2011 (2002 Prices)

Area	2006	2011	Pattern of trade Diversion		% Loss of trade against 2011 turnover levels	% Retail Impact against 2006 turnover levels
	Turnover €m	Turnover €m	%	€m	%	%
Kilnamanagh District Centre	n/a	n/a	50	4.6	n/a	n/a
Tallaght Town Centre	234.1	278.0	40	3.6	1.3	0.0
Other Centres in Catchment	33.1	39.3	5	0.5	1.2	0.0
Centres Outside Catchment	n/a	n/a	5	0.5	n/a	n/a
Total			100	9.1		

Source: Tom Phillips + Associates (2006)

The second last column in Table 7.1 sets out the percentage loss Tallaght Town Centre and other centres will experience when measured against 2011 turnover levels. For example, some €3.6m of the comparison turnover of the additional floorspace involved will be diverted from existing stores in Tallaght Town Centre, which represents just 1.3% of the towns estimated 2011 turnover level (€278.0m).

Table 7.2 highlights that the additional comparison floorspace component of the proposal has **no retail impact** on Tallaght Town Centre or any other centre in the remainder of the catchment area.

Overall, our comparison impact assessment and our capacity assessment (Section 6) indicate that while the Subject Application will increase the attraction of Kilnamanagh District Centre for local residents it will not attract a high proportion of shoppers from Tallaght Town Centre or other centres. This is primarily due to the scale of Tallaght Town Centres attraction, the limited floorspace proposed in the Subject Application and its location as an extension of an existing District Centre retail offer. As a result a significant increase of additional consumer numbers is not envisaged.

7.6 Cumulative Retail Impact

The RPGs also require an RIS to address issues of cumulative retail impact – that is where there are one or more other retail developments which together could have a combined impact on one or more centres. As there is no extant planning permission prevailing in the catchment area, cumulative impact is not an issue in respect of the proposed development.

7.7 Conclusions

The assessment of retail and cumulative impact has demonstrated that the proposed development will not have an adverse effect on any of the other centres considered.

8.0 SUMMARY AND CONCLUSIONS

This Retail Impact Statement has assessed the proposed development in the context of existing planning policy. In addition, quantitative and qualitative appraisals of the potential impact of the development area have been undertaken. The conclusions of these assessments are summarised below.

8.2 Quantitative Assessment

8.2.1 Design Year and Turnover

The design year for testing impact has been set at 2011 which is the second year of full trading following the opening of the additional comparison floorspace. This is the length of time required for a new retail development to fully establish a permanent pattern of trading.

The additional retail floorspace proposed comprises:

- 1,371 sq m of net comparison floorspace.

This additional retail floorspace is expected to generate an annual turnover of €9.1m. All monetary values have been set at 2002 prices.

8.2.2 Catchment Area and Population Forecasts

The catchment area for the proposed development is used to quantify capacity and establishes the area from which the majority of the turnover of the proposal will be drawn. The catchment area for the proposal has been defined having regard to the scale of the development, the distribution of population, travel times and the location and offer of competing centres. It is also informed by our health check appraisal of Kilnamanagh.

Population forecasts are informed by past trends and by demographic information contained in relevant Local, County, Regional and State Plans. The population of the catchment area is forecast to increase by 1.5% per annum in the period to 2011. These projections estimate the population of the catchment to rise from its 2006 level of 30,770 to 33,148 by 2011.

8.2.3 Capacity Assessment

Our capacity assessment indicates that there is room for an additional 3,855 sq m of comparison floorspace in the catchment area. Therefore, at the design year there is excess capacity of 2,484 sq m for comparison floorspace **offer** taking our proposal into account.

We would stress, however that the RPGs do not indicate that a capacity assessment is mandatory for a development of this type and it does not form part of the Assessment of Retail Impact in Annex 4. Therefore, the excess of capacity identified must be considered in the context of retail and cumulative retail impact.

8.2.4 Retail Impact

Retail Impact is defined as occurring when a new retail development drives the turnover of an established centre below its current trading levels (2006 in this case). **It is this assessment which provides the best quantitative indication of the impact of a proposed development on the vitality and viability of existing centres.**

The proposed development will **not** have a comparison retail impact on Tallaght Town Centre. This is attributable to:

- i. The small level of additional comparison floorspace purposed when compared to the quantum and range of comparison floorspace contained in Tallaght;
- ii. Ongoing growth in expenditure capacity in the catchment; and
- iii. The location of the additional comparison floorspace as part of the existing Dunnes Stores. This provides for an increase in linked shopping trips but not a stand alone comparison shopping destination.

8.2.5 Cumulative Retail Impact

The RPGs require assessment of the cumulative impact of new retail developments which have been granted full permission. At the time of this study, there were no extant planning permissions for retail development in the catchment area over the thresholds set out in the County Plan and, as such, cumulative impact is not an issue in respect of the proposed development.

8.3 Qualitative Assessment

The qualitative assessment of the potential effects of the proposed development is founded in addressing the criteria identified in the RPGs and County Plan. These are set out in Section 1 of this RIS and headlined below. The assessments are informed by our review of the policy context of the proposal and the health check undertaken as part of this RIS:

8.3.1 Long Term Strategy for Town Centre

"Supports the long-term strategy for town centres as established in the Development Plan and not materially diminish the prospect of attracting private sector investment into the town centre."

As established in Section 3 of this report, the proposed development complies with Development Plan policy in terms of location of the development in existing town or district centres. It is also considered that the nature of the proposed floorspace, comprising an addition to the centres comparison offer is appropriate to the role of a District Centre, serving the needs of the local community.

In light of the above, it is considered that both the scale and nature of the proposed development comply with Development Plan policy. This view is supported by the quantitative and qualitative assessment of the proposal, undertaken at Sections 5, 6 and 7 of this RIS respectively, which conclude that there will be no significant retail impact as a result of the current scheme. It is strongly contended therefore that the proposed development would not materially diminish the prospect of attracting private sector investment to either the existing or other town/district centres.

8.3.2 Adverse Impact on Town Centres

"Does not cause any adverse impact on one or more town centers, either singly or cumulatively with recent development or other outstanding planning permissions, sufficient to undermine the quality of the centre or its role in the economic and social life of the community."

As demonstrated in the quantitative retail impact assessment, the proposed development will have no retail impact on Tallaght Town Centre. As there have been no recent applications granted for retail development in the catchment area, a cumulative impact assessment was not required.

8.3.3 Diminish Town Centre Activities

"Does not diminish the range of activities and services that a town centre can support."

Based on the fact that the quantitative analysis indicates that the proposed development would not have any impact on existing centres, it is considered that the proposal would add to the range of activities supported in Kilnamanagh and will not, for the reasons outlined above, diminish the range of activities and services that other town centres can support.

8.3.4 Better Accessibility

"Ensure a high standard of access so that the proposal is easily accessible by all sections of society, especially the disabled."

The location and orientation of the proposed development ensures that the proposal is highly accessible by all sectors of society. The proposal is within walking distance of a range of bus services in addition to the Kingswood and Tallaght Luas stops. Kilnamanagh District Centre is also easily accessible by car based shoppers, with access via Mayberry Road.

8.3.5 Links with Existing Town Centre

"Will link effectively with an existing town centre so that there is likely to be commercial synergy."

The proposed development encompasses an addition to the District Centres comparison retail floorspace. As such, it is considered that the proposed development will improve commercial synergy within the District Centre by better meeting the needs of local residents and streamlining the need for residents to travel to other Town Centres in the vicinity to avail of modern retailing provision which meets their needs.

8.3.6 The Sequential Approach

The RPGs recommend that a sequential approach be taken when selecting a site appropriate to accommodate a retail proposal: *'the preferred location for new retail development where practicable and viable, is within a town centre (or district or major village centre)'* (Paragraph 58).

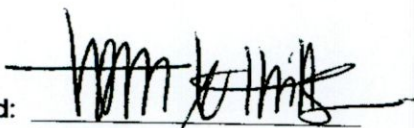
Given that the subject application lies within an established District Centre it inherently complies with the principles of the Guidelines.

8.4 Conclusions

The proposed development will provide the quantum of floorspace required to meet the growing needs of Kilnamanagh and its catchment area residents. In so doing, it will facilitate a competitive and healthy retail environment, consolidating the existing retail offer, while reinforcing the sustainable development of the catchment.

The quantitative and qualitative assessment of the potential retail impact of the proposed development confirms that the proposal will not have an adverse effect on the vitality and viability of Tallaght Town Centre. In fact, the proposal and its role and function have been illustrated to make an important contribution to securing the objectives of the RPGs as well as those of the GDA Retail Strategy and County Plan.

Our research and analysis provide a detailed and transparent basis to assist the Council in its decision making. However, if clarification of any of the detail/our approach or assumptions is required then we would be happy to present and discuss the conclusion of this RIA to Council Offices.

Signed: 

Tom Phillips
Managing Director
Tom Phillips + Associates

Encl.