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Planning Department
South Dublin County Council
County Hall
Tallaght
Dublin 24



Wednesday, 10th August 2022

Dear Sir/Madam

**RE: RESPONSE TO REQUEST FOR FURTHER INFORMATION IN RESPECT OF
DEVELOPMENT AT BLOCK D2, TWO OAKS, SCHOLARSTOWN ROAD, DUBLIN 16**

South Dublin County Council Register Reference: SD22A/0128

1.0 INTRODUCTION

1.1 Response to Request for Further Information by South Dublin County Council

This letter is submitted by Thornton O'Connor Town Planning¹ on behalf of Ardstone Homes Limited² in response to a *Request for Further Information* issued by South Dublin County Council, dated 27th June 2022, in respect of development at Block D2 in the Two Oaks site, Scholarstown Road, Dublin 16.

This Response to the *Request for Further Information* has been prepared by Thornton O'Connor Town Planning in association with John Fleming Architects³ and DBFL Consulting Engineers⁴.

1.2 Documents Enclosed

1.2.1 Cover Letter

Some 6 No. copies of this cover Letter prepared by Thornton O'Connor Town Planning, dated 10th August 2022.

1.2.2 Sequential Test

Some 6 No. copies of a Sequential Test prepared by Thornton O'Connor Town Planning, dated 10th August 2022.

¹ Paradigm House, Dundrum Office Park, Main Street, Dundrum, Dublin 14

² 48 Fitzwilliam Square, Dublin 2

³ The Treehouse, 17 Richview Office Park, Clonskeagh, Dublin 14.

⁴ Ormond House, Upper Ormond Quay, Dublin 7



1.2.3 Car Parking Rationale Report

Some 6 No. copies of a Car Parking Rationale Report prepared by DBFL Consulting Engineers, dated 9th August 2022.

1.2.4 Drawings

| John Fleming Architects | | | |
|-------------------------|-------------------------|-------|------|
| Drawing No. | Drawing Title | Scale | Size |
| SKA-001 | Proposed Parking Layout | NTS | A3 |
| CH-JFA-D2-ZZ-DR-A-1101 | Retail Block D2 | 1:200 | A3 |

2.0 RESPONSE TO FURTHER INFORMATION REQUEST

The Planning Authority set out the following:

2.1 Item No. 1: Sequential Test

Item No. 1 states:

'The proposed development would provide for an approx. 520.5sq.m retail unit. This is a significant increase to what was previously permitted per unit. It is noted that this size of unit does not trigger the preparation of a full Retail Impact Assessment or Transport Impact Assessment under the South Dublin County Development Plan 2016-2022. However, the Planning Authority has concerns of the impact of the proposal on the vitality and viability of surrounding retail centres, including the Knocklyon District Centre. The sequential approach also has not been demonstrated to justify a unit of this size outside a zoned retail area. The applicant is therefore requested to provide justification for a retail unit of this size at this location. The Planning Authority would have particular concerns in relation to impact on surrounding retail centres and traffic generation. The applicant should also indicate opening hours of the unit. b). The applicant is requested to clearly delineate the net retail floorspace of the subject development'.

2.1.1 Response to Item No. 1

- (a) Whilst the gross floor area of the larger unit is 520.5 sq m, the net floor area for trading is only 235 sq m (see Drawing No. DR-A-1101 enclosed in response to Item 2(b) which annotates the net floor area of the scheme).

Essentially, it is intended that this unit will have a very local draw for day-to-day needs, serving firstly the c. 1,500 No. residents in the permitted 590 No. units in the Two Oaks development which is due to be fully occupied by May 2023. Beyond the residents, due to the retail units scale which is only for day-to-day top-up needs, it will only serve the very immediate environs, for dwellings which don't have a similar small scale shop closer to them.

In trying to move towards the idea of car free living or reducing the number of car-based trips required by the Two Oaks residents, the Applicant is looking to provide a small convenience unit to service just their immediate needs.

Please see enclosed a Sequential Test which demonstrates the impact over time of the proposed development on existing centres vitality, viability and investment, clarifies whether additional convenience retail at the proposed location is needed, and determines whether the cumulative impact of total convenience retail in the area would be impacted negatively by the proposed development.

In assessing these impacts, the key points concluded are as follows:

- **Occupancy rates** act as a significant measure of the health of retail activity in an area. Ground floor retailing within the catchment area is at full occupancy with dozens of units occupied offering a diverse mix of

convenience retail for local populations. The lack of vacancy is very strong signal of demand, and can argue the case for increasing retail opportunity in the area at strategic locations.

- There have been significant **population increases** over past 6 No. years as indicated by the latest Census 2022 data. Between 2016-2022 County Dublin experienced a growth rate of 7.7%. Over the same period, the catchment area experienced nearly double that level of growth at 14.6%. It is expected that the proposed development (590 No. units) will increase retail demand by a further 1,500+ No. persons over the next 12 No. months. The combination of historic and future levels of growth will continue to increase the level of consumer demand in the area. Given the pace of population growth and the lack of new retailing opportunity in the catchment over the past 6 No. years, a new local convenience shop at the subject site would serve to boost much needed supply in the area.
- The primary purpose of this single retail unit will be **'top-up' shopping** for the resident population generated by the scheme itself. It is intended that this unit will have a very local draw for day-to-day needs, serving firstly the c. 1,500 No. or so persons in the proposed development, and then the immediate environs. Due to its scale, it is not considered that it will be a draw beyond that. In trying to move towards the idea of car free living or reducing the number of car-based trips required by our residents, the scheme is looking to provide a small convenience unit to service immediate household needs. Given the constraints on the range of goods and shelf space within the newly proposed amalgamated unit (net retail trade area of 235 sq m), it's unlikely to cause trade diversion from Knocklyon District Centre from existing 2022 levels. In all likelihood demand for supermarket shopping will increase significantly over the 12 No. months as residential units in the scheme are completed and an increasing number of families and households do their weekly shop at Knocklyon District Centre.

Notwithstanding the fact that it has been demonstrated that the sequential test has been satisfied, the wider retail planning guidelines are clear of the importance of small convenience shops of under 1,000 sq m outside of existing centres and its necessity for top-up shopping. It is considered that the application site satisfies the requirements of this policy given the close proximity of the subject site to the proposed large scale residential area, the lack of new convenience floorspace despite significant population increase in the area over the past decade, and the provision of cycle parking facilities, which will serve to encourage trips by cyclists and pedestrians.

2.2 Item No. 2: Car-Parking

(a) Considering the proposed amalgamation of the units in Block D2, and the potential increase in traffic generated, the car parking ratio for the development as a whole must be carefully considered. The applicant is requested to submit a car parking rationale including calculations used, and, if applicable, a revised car parking drawing. This will need to reflect on the type of retail unit that will be in operation, and the anticipated customer footfall/staff numbers and associated parking demand, and to propose a parking provision that reflects this analysis.

Please refer to the South Dublin County Development Plan 2016-2022 Tables 11.23 & 11.24 for guidance on car parking rates. (please also note Item no.3 in relation to new Development Plan)

(b) The applicant is requested to submit a bicycle parking rationale including calculations used. This will need to reflect on the type of retail unit that will be in operation, and the anticipated footfall/staff numbers and associated bicycle parking demand, and to propose a parking provision that reflects this analysis. Please refer to the South Dublin County Development Plan 2016-2022 Table 11.22 for guidance on minimum bicycle parking rates.

2.2.1 The Applicant's Response

In response to this Item, please see enclosed a car-parking and cycle parking rationale from DBFL Consulting Engineers, which designates an appropriate quantum of car-parking for the retail having regard to the specific site location and characteristics and identifies the provision of increased cycle parking on the site to serve the retail unit.

2.3 Item No. 3: South Dublin Development Plan 2022-2028

Item No. 3 states:

'The applicant is advised that the South Dublin County Development Plan 2022 - 2028 was made by resolution by the Elected Members on June 22nd and will come into effect on August 3rd 2022. In accordance with Section 34 (2) of the Planning and Development Act 2000 (as amended), the Planning Authority will have regard to the South Dublin County Development Plan 2022-2028 as the development plan for the area when making decisions in relation to applications from August 3rd 2022. In this context, the applicant is requested to provide a report demonstrating that the proposed development is in accordance with the South Dublin County Development Plan 2022-2028'.

2.3.1 The Applicant's Response

The Sequential Test enclosed in response to Item No. 1 has demonstrated that the proposed development complies with the zoning proposed in the 2022-2028 *Development Plan* with a 'shop-local' moved from an open for consideration use in the 2016-2022 Plan to a 'permitted in principle use' in the 2022-2028 Plan.

The Sequential Test also demonstrates that the development accords with the relevant retail policies outlined in the retail strategy.

With regard to car-parking and cycle parking, please see the enclosed Report by DBFL which details compliance with the *South Dublin County Development Plan 2022-2028* in respect of car and cycle parking.



3.0 CONCLUSION

We trust that this submission fully addresses the *Request for Further Information* in respect of the subject development.

Please revert to us if we can be of further assistance or clarification.

We look forward to receiving an acknowledgement and subsequent Decision in respect of the above.

Yours faithfully

Patricia Thornton

Patricia Thornton
Director
Thornton O'Connor Town Planning