



THORNTON O'CONNOR
TOWN PLANNING

Sequential Test

Sequential Test

In respect of an amendment to Retail Unit in
Block D2 for lands located at Scholarstown
Road, Dublin 16

Submitted on Behalf of
Ardstone Homes Limited

August 2022



Contents

1.0 INTRODUCTION	1
2.0 CONTEXT	2
3.0 SEQUENTIAL TEST	8
4.0 CONCLUSION	11

APPENDIX 1 Catchment Mapping in Landscape A4 format.

1.0 INTRODUCTION

- 1.1 This Sequential Test has been prepared to accompany the planning application being made by Ardstone Homes Ltd for a proposed local convenience retail unit located in Block D2 as part of a development north of Scholarstown Road called 'Two Oaks' Rathfarnham, Dublin 16.
- 1.2 The assessment has regard to the Retail Planning Guidelines for Planning Authorities, DECLG (2012), the Retail Strategy for the Greater Dublin Area, Regional Planning Guidelines Office (2008) and the core retailing objectives of the South Dublin County Council Development Plan 2016-2022 and the South Dublin County Council Development Plan 2022-2028 (due to come into effect on 3rd August 2022), and application of the sequential approach.
- 1.3 The application provides for the creation of a new local convenience retail unit with a gross floor area (GFA) of 520.5 sq m, consisting of a ground floor GFA of 249 sq m with a net retail trade area of 235 sq m and a first-floor ancillary retail unit not utilized as a trading area measuring 271.5 sq m (GFA). The application site is currently under construction and due to be complete by May 2023 and is located south-east corner of the 4.4 Ha new development consisting of 590 No. residential units. The subject lands are zoned Objective 'RES' in the South Dublin Development Plan 2016-2022 and 2022-2028, where the objective aims to '*protect and/or improve residential amenity*'. Café/restaurant and shop-local were both open for consideration under this zoning in the recently expired Plan, whilst shop-local has moved into the permitted in principle category in the 2022-2028 Development Plan.
- 1.4 The application proposal has been considered against the key test laid down in the South Dublin County Council Development Plan 2016-2022 and 2022-2028. These tests relate to impact on key Village or District Centre health and vibrancy, regeneration and employment, levels of accessibility and whether there are sequentially preferable sites available within or adjoining nearby Centres to accommodate the development proposed.
- 1.5 Section 2 of this statement sets out the context in which these proposals have been considered, and Section 3 sets out the sequential assessment that has been undertaken.

2.0 CONTEXT

2.1 The application site is located on Scholarstown Road (Figure 2.1) approximately 800 No. metres to the south-east of Knocklyon District Centre. Permission was granted on site for the construction of 590 No. apartments, and a number of commercial units including a 2 No. storey retail/café/restaurant building. The amendment to the original permission seeks to amalgamate the two ground floor retail units and change the use of the first floor from café/restaurant to ancillary retail uses (principally storage/back-office function). This amalgamation would create a *single* larger retail unit intended for 'top-up' convenience retail with a gross floor area of 520.5 sq m.

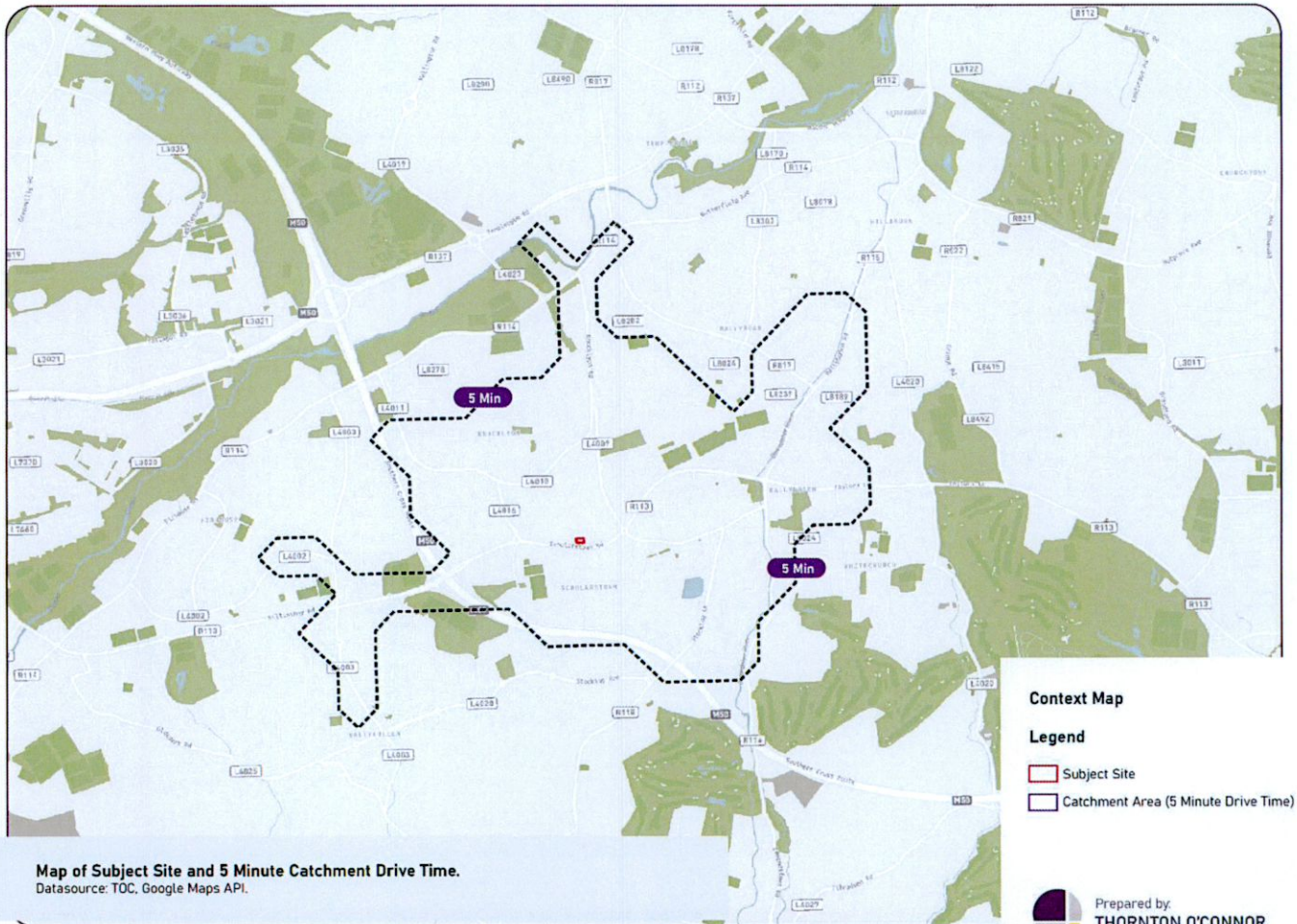


Figure 2.1. Subject Site and 5 No. Minute Drive Time Catchment

2.2 Whilst policy does not state that the sequential test must be applied to retail development of this scale as it is below the threshold required for a Retail Impact Assessment, given the nature of the change in retail provision, and the increased size of the single unit, a sequential approach is requested to demonstrate the need for a unit of this size 'outside a zoned retail area'. Within this justification there must also be an assessment of the potential negative impact of the proposal on the vitality and viability of the surrounding retail centres.

2.3 In carrying out the sequential approach it is first necessary to establish the status in sequential terms of the application site. The proposed single unit will be located 'outside a zoned retail area' and have a net floor area of 235 sq m, primarily intended to cater for the increased demand associated with proposed development (590 No. apartments and 1,500+ additional persons). Due to the size of the development proposal, a 5 No. minute drive-time isochrone is appropriate (Figure 2.1). This represents the journey time that customers would be prepared to travel for 'top-up' purchases from a convenience store of the scale that is proposed. A convenience retail unit of this size could not provide the range of product or level of stock necessary to compete with larger supermarkets or weekly household shopping.

2.4 Four retailing areas have been identified in the study within the catchment (Figure 2.2). The South Dublin Retail Hierarchy provides designations for the level of convenience retail activity that should occur in/out of centres across 5 No. levels. A single urban centre referenced in the Development Plan has been identified within a 5 No. minute drive time of the subject site, Knocklyon Shopping Centre (Level 4). The catchment has a number of other smaller retailing locations to cater for local 'top up' shopping which have also been assessed in this study.

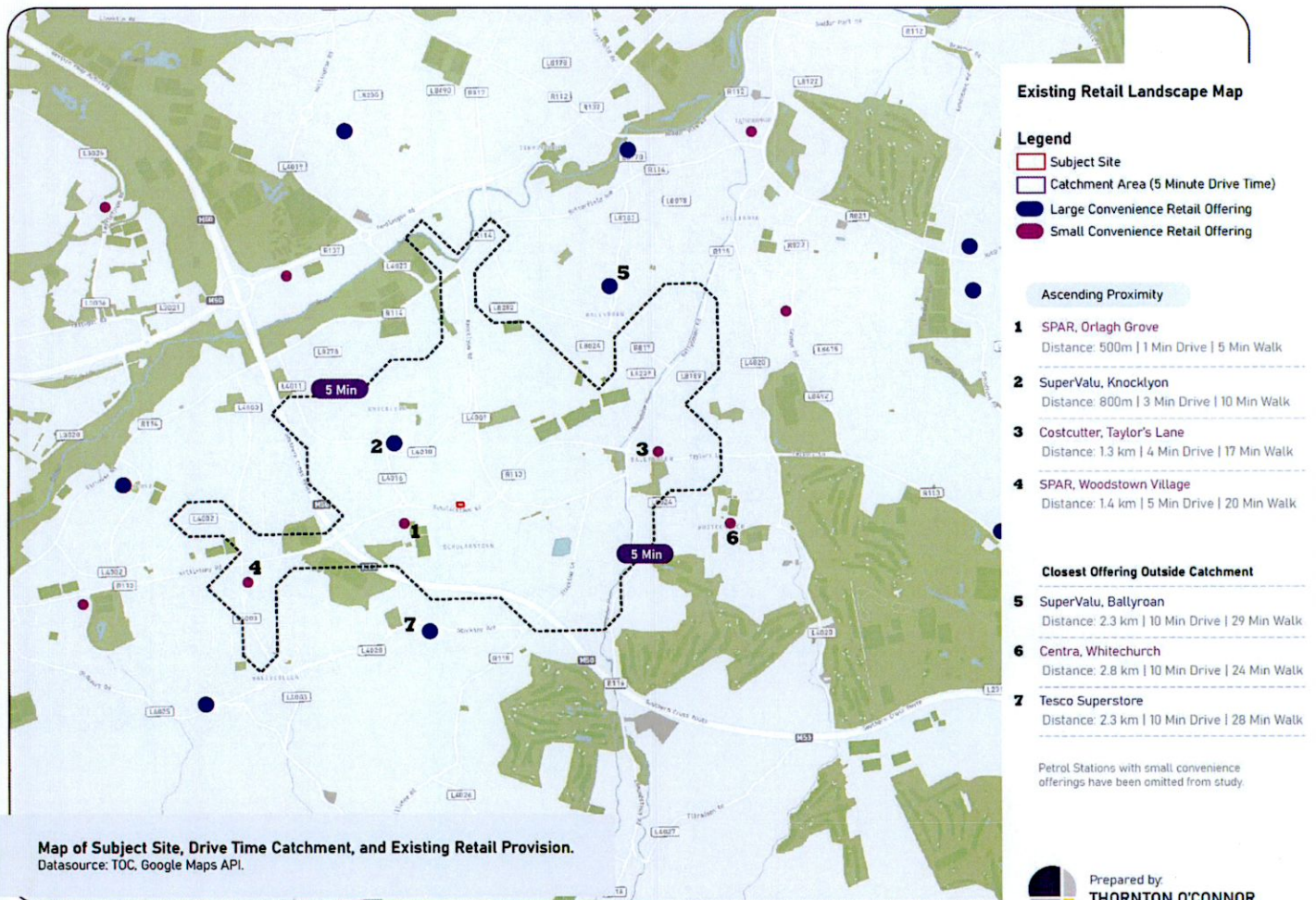


Figure 2.2. Existing Retail Provision in Catchment

2.5 The catchment area has experienced significant population increases over past 6 No. years as indicated by the latest Census 2022 data. Between 2016-2022 County Dublin experienced

a population growth rate of 7.7%. Over the same period, the catchment area (Figure 2.3) experienced nearly double that level of growth at 14.6% or 2,444 No. persons. Moreover, it is expected that the proposed development (590 No. units) will increase retail demand by a further 1,500+ persons over the next few years. 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 proposed amendment also aligns with primary retail objectives for local convenience in the both the current *South Dublin 2016-2022 Retail Strategy*, and the *Draft South Dublin 2022-2028 Retail Strategy* to:

R1 Objective 9: To encourage and facilitate the provision of local convenience shops (Shop – Local) in existing residential areas where there is a deficiency of retail provision in the catchment, subject to protecting residential amenity.

[P.95 South Dublin County Development Plan 2016-2022]

EDE14 Objective 1: To support the development and enhancement of local centres as sustainable, multifaceted, retail led mixed use centres, enhancing local access to daily retail needs, which do not adversely impact on or draw trade from higher order retail centres.

[P.352 Draft South Dublin County Development Plan 2022-2028]

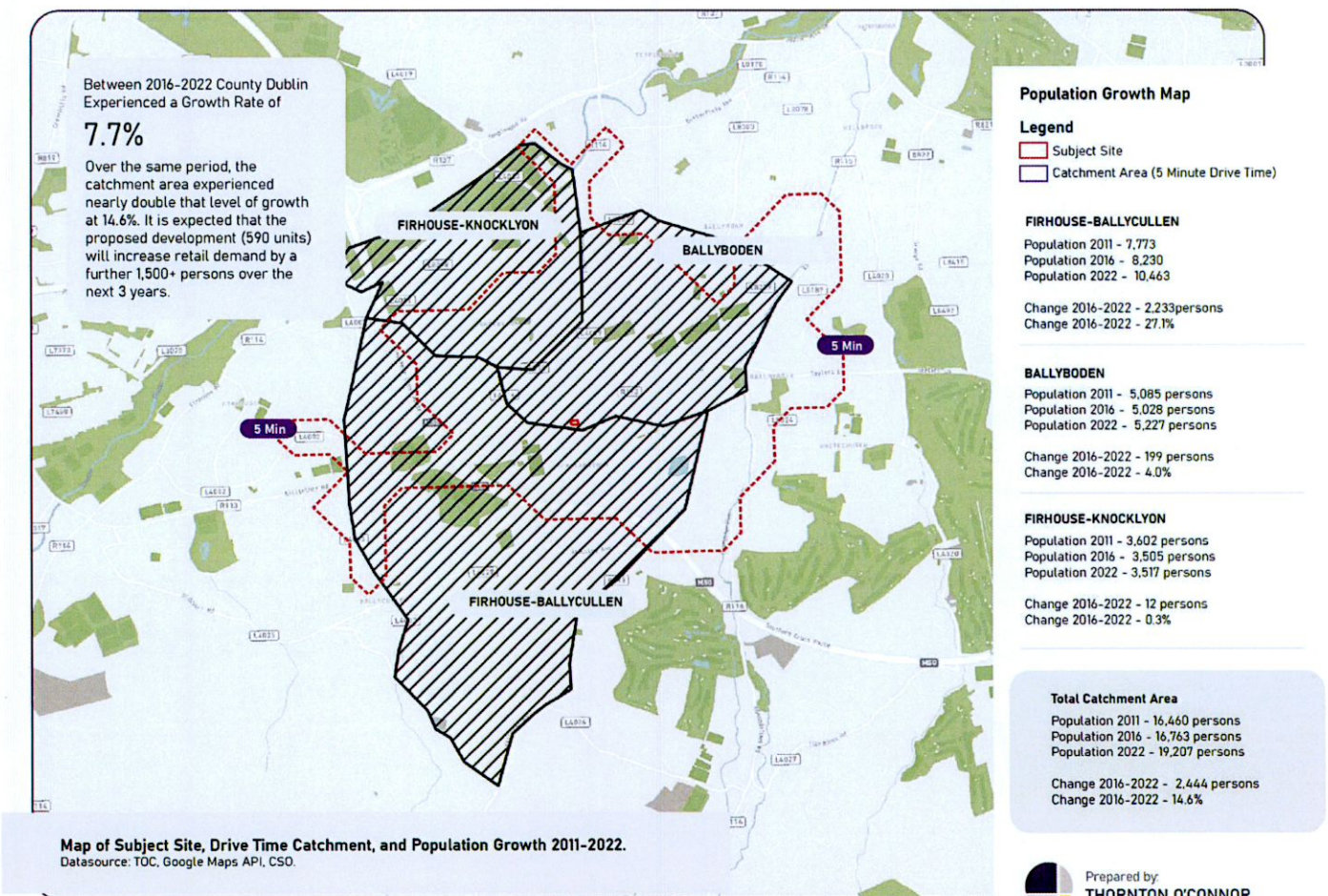


Figure 2.3. Demographic Growth Map 2011-2022

2.6 Taking this information into consideration, the applicant believes that a small convenience retail unit would offer greater benefit to the local community who will otherwise have to travel further afield for 'top-up' purchases.

3.0 SEQUENTIAL TEST

3.1 Due to the size of the development proposal, a 5 minute drive-time isochrone was used to represent the maximum journey time that customers would be prepared to travel for 'top-up' purchases (Figure 3.1). This isochrone has been derived from the Google Maps API which allows for journey times to be accurately calculated and weighted using real-time traffic information. Figure 3.1 below shows the retail locations assessed within the study.

3.2 The defined centres which have been identified and their status are as follows;

- Knocklyon District Centre (Principal Shopping Area, Level 4)
- Orlagh Grove (Local Shopping, Level 5)
- Taylor's Lane (Local Shopping, Level 5)
- Woodstone Village Centre (Local Shopping, Level 5)

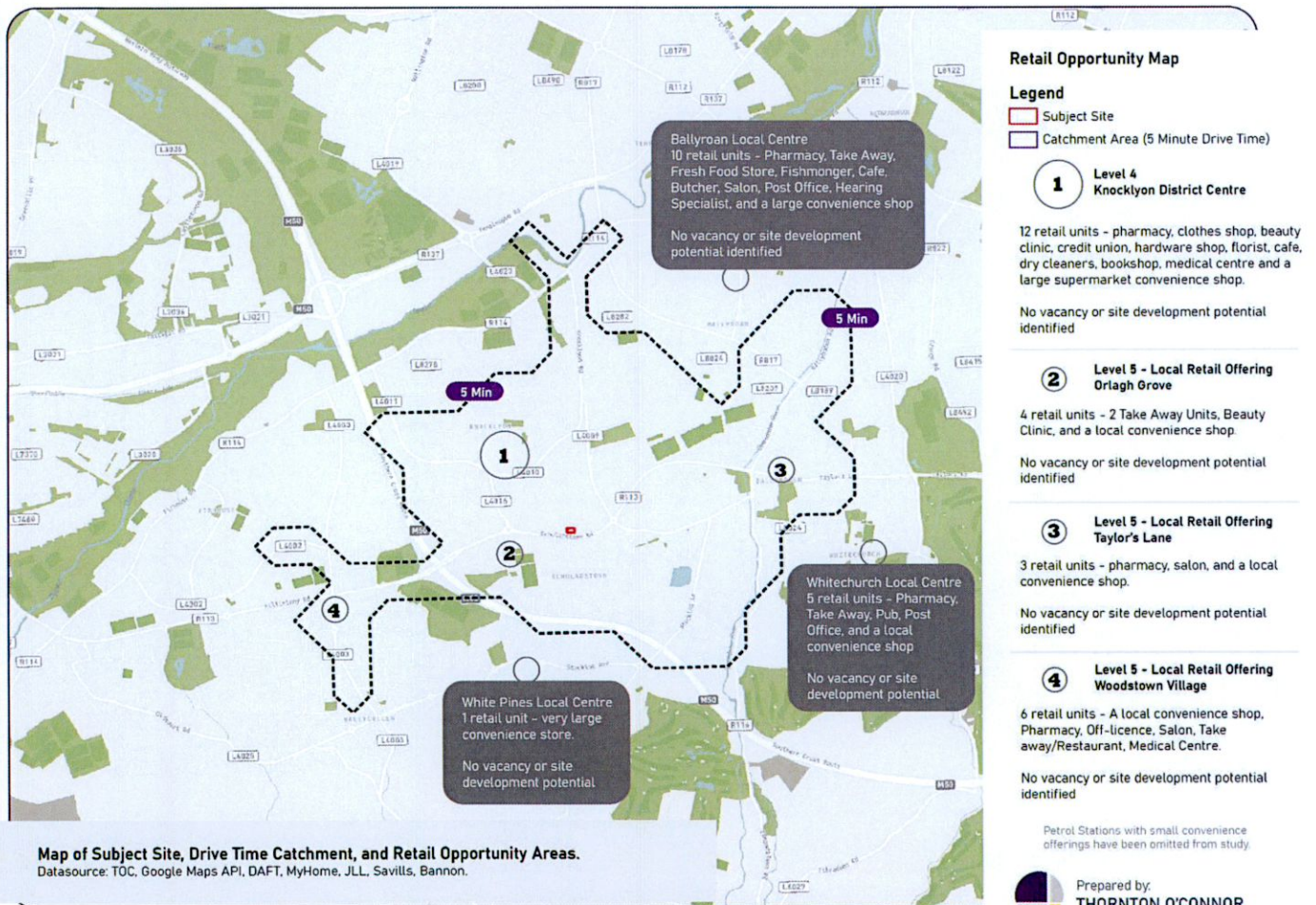


Figure 3.1. Retail Opportunity Areas located in Catchment

- 3.3 A site visit to each of the centres identified above was undertaken on **18th July 2022** to identify vacancy and if any sequentially preferable sites were available within the defined catchment. The results of this visit are provided below:

Knocklyon District Centre

- 3.4 Knocklyon District Centre is located 800 metres or approximately 3-4 No. minutes' drive time from the application site. The centre offers 11 No. smaller retail units, and a large supermarket anchor store. As of the 18th of July 2022 the destination has a 100% occupancy rate. During the site visit, a vacant smaller retail unit was identified (Figure 3.2). It was established (through the Agent) that this unit has been let and will soon be occupied by a new tenant. Given the size of this unit and relative proximity to the existing supermarket, this site would not offer preferential characteristics to be used for smaller convenience retailing. This unit was single storey, with the ground floor trading area estimated under 60 sq m.



Figure 3.2. Vacant Unit in Knocklyon Shopping Centre

- 3.5 The property also comprises a range of other ground floor retail offering, pharmacy, clothes shop, beauty clinic, credit union, hardware shop, florist, cafe, dry cleaners, bookshop, and medical centre providing a good mix of day-to-day retail options for residents of the Knocklyon area.
- 3.6 No other vacant premises or land were identified within the defined centre.

Orlagh Grove

- 3.7 Orlagh Grove is located 500 No. metres to the south-west of the application site. Within the property there are 4 No. ground floor retail units, consisting of 2 No. food take away units, a beauty clinic, a local convenience shop (Spar), and a creche on the first floor, all actively trading. The location is within a housing estate surrounded by residential units, a church and secondary school.
- 3.8 At the time of survey there were no vacant units in the property or land available which could accommodate further development proposals.

Taylor's Lane

- 3.9 This property is located to the east on the application site on Taylors Lane at the edge of the 5 No. minute isochrone, approximately 17 No. minute walk time from the site. The property has 3 No. ground floor retail units, all actively trading. Within the property a range of uses and services can be found including pharmacy, salon, and a local convenience shop (Costcutter).
- 3.10 At the time of survey there were no vacant units in the property or land available which could accommodate further development proposals.

Woodstone Village Centre

- 3.11 Although, this centre is located within the 5 No. minute drive time isochrone, it is located across the M50 motorway junction which is likely to be perceived as a physical barrier to those living in the Scholarstown Road area requiring top-up purchases.
- 3.12 Woodstown Village Centre offers 6 No. ground floor retail units and includes a Spar convenience retail unit. The property also comprises, a pharmacy, off-license, salon, take away/restaurant, and medical centre offering a good mix of day-to-day retail options around the Woodstown area.
- 3.13 At the time of visiting there were no vacant units or land available which could accommodate the development proposals.
- 3.14 Having sought to identify available land or premises within the defined centres as set out above, edge of centre locations (within 300 metres of centre) were also considered to ascertain whether any suitable opportunities existed. It has been concluded that no available or suitable sites exist within edge of centre for any of the four locations.
- 3.15 The Sequential Test only identified one vacant ground floor property within the catchment area. It was subsequently confirmed that this unit has rented and will soon be occupied. It is therefore considered that there are no suitable locations for this retail offer, and that the application site offers a prime location to add convenience retail for the local area, particularly having regard to its primary function to serve the residents in Two Oaks.
- 3.16 While there may be suitable retail opportunities that exist outside of the 5 No. minute drive time catchment, these locations are unlikely to provide a convenient facility for those living near the Scholarstown Road development who would be without sufficient convenience retail options.

4.0 CONCLUSION

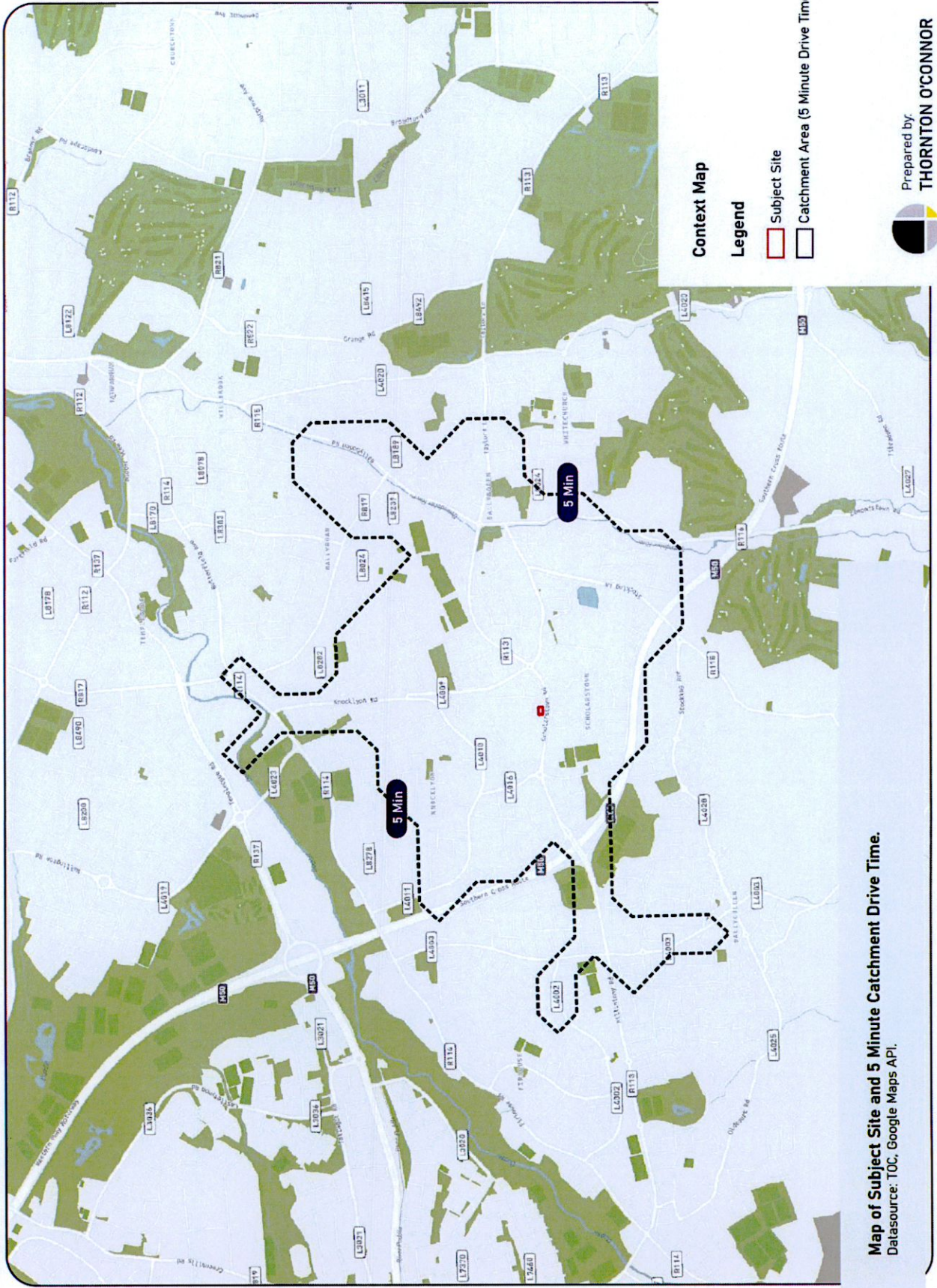
4.1 The purpose of this sequential test is to consider the impact over time of the proposed development on designated centres vitality, viability and investment, whether additional convenience retail at the proposed location is needed, and determining whether the cumulative impact of total convenience retail in the area would be impacted negatively and if there is evidence existing retailers should be concerned. In assessing these impacts, the key points identified are:

- **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 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 units are completed and an increasing number of families and households do their weekly shop at Knocklyon District Centre.

4.2 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 growth in the area over the past decade, and the provision of cycle parking facilities, which will serve to encourage trips by cyclists and pedestrians.



Appendix 1- A4 Landscape Mapping

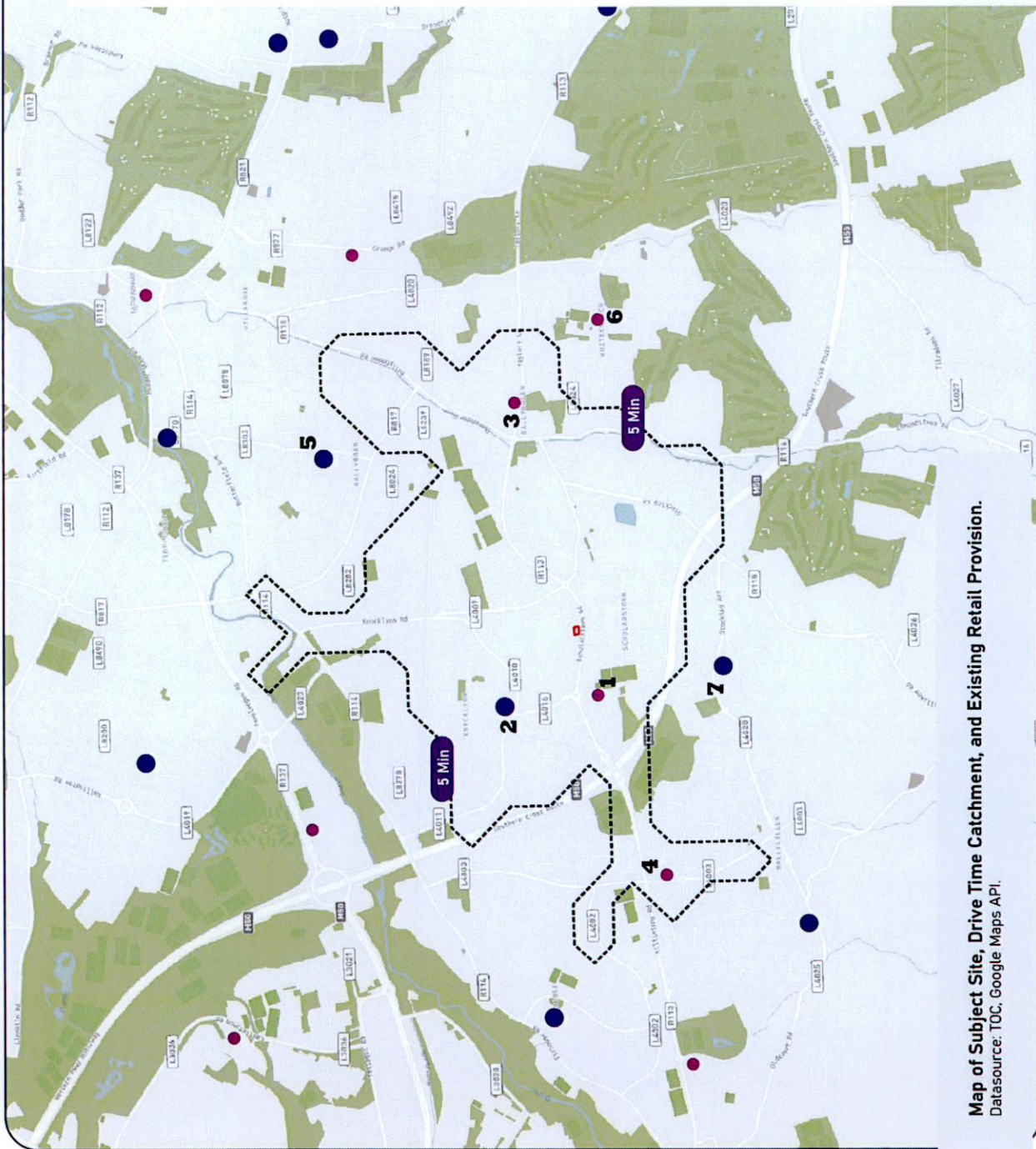


Context Map

Legend

- Subject Site
- Catchment Area (5 Minute Drive Time)

Map of Subject Site and 5 Minute Catchment Drive Time.
 Datasource: TOC, Google Maps API.



Existing Retail Landscape Map

Legend

- Subject Site
- Catchment Area (5 Minute Drive Time)
- Large Convenience Retail Offering
- Small Convenience Retail Offering

Ascending Proximity

- 1** SPAR, Orlagh Grove
Distance: 500m | 1 Min Drive | 5 Min Walk
- 2** SuperValu, Knocklyon
Distance: 800m | 3 Min Drive | 10 Min Walk
- 3** Costcutter, Taylor's Lane
Distance: 1.3 km | 4 Min Drive | 17 Min Walk
- 4** SPAR, Woodstown Village
Distance: 1.4 km | 5 Min Drive | 20 Min Walk

Closest Offering Outside Catchment

- 5** SuperValu, Ballyroan
Distance: 2.3 km | 10 Min Drive | 29 Min Walk
- 6** Centra, Whitechurch
Distance: 2.8 km | 10 Min Drive | 24 Min Walk
- 7** Tesco Superstore
Distance: 2.3 km | 10 Min Drive | 28 Min Walk

Petrol Stations with small convenience offerings have been omitted from study.

Map of Subject Site, Drive Time Catchment, and Existing Retail Provision.

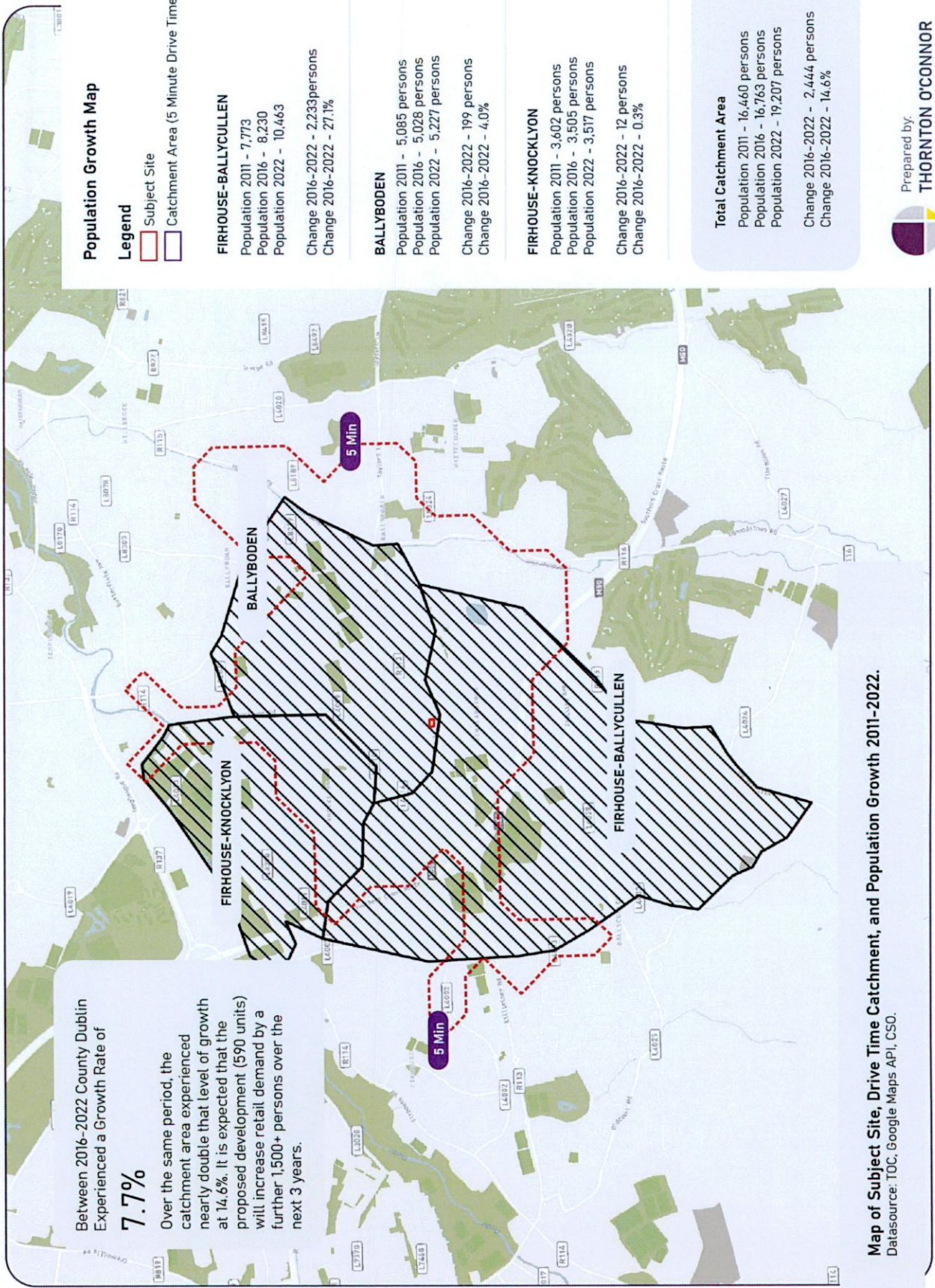
Datasource: TOC, Google Maps API.



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 units) will increase retail demand by a further 1,500+ persons over the next 3 years.



Population Growth Map

Legend

- Subject Site
- Catchment Area (5 Minute Drive Time)

FIRHOUSE-BALLYCULLEN

Population 2011 - 7,773
 Population 2016 - 8,230
 Population 2022 - 10,463
 Change 2016-2022 - 2,233 persons
 Change 2016-2022 - 27.1%

BALLYBODEN

Population 2011 - 5,085 persons
 Population 2016 - 5,028 persons
 Population 2022 - 5,227 persons
 Change 2016-2022 - 199 persons
 Change 2016-2022 - 4.0%

FIRHOUSE-KNOCKLYON

Population 2011 - 3,602 persons
 Population 2016 - 3,505 persons
 Population 2022 - 3,517 persons
 Change 2016-2022 - 12 persons
 Change 2016-2022 - 0.3%

Total Catchment Area
 Population 2011 - 16,460 persons
 Population 2016 - 16,763 persons
 Population 2022 - 19,207 persons
 Change 2016-2022 - 2,444 persons
 Change 2016-2022 - 14.6%

Map of Subject Site, Drive Time Catchment, and Population Growth 2011-2022.

Datasource: TOC, Google Maps API, CSO.



Prepared by:
THORNTON O'CONNOR

Retail Opportunity Map

Legend

- Subject Site
- Catchment Area (5 Minute Drive Time)

1 Level 4 Knocklyon District Centre

12 retail units - pharmacy, clothes shop, beauty clinic, credit union, hardware shop, florist, cafe, dry cleaners, bookshop, medical centre and a large supermarket convenience shop.

No vacancy or site development potential identified

2 Level 5 - Local Retail Offering Orlagh Grove

4 retail units - 2 Take Away Units, Beauty Clinic, and a local convenience shop.

No vacancy or site development potential identified

3 Level 5 - Local Retail Offering Taylor's Lane

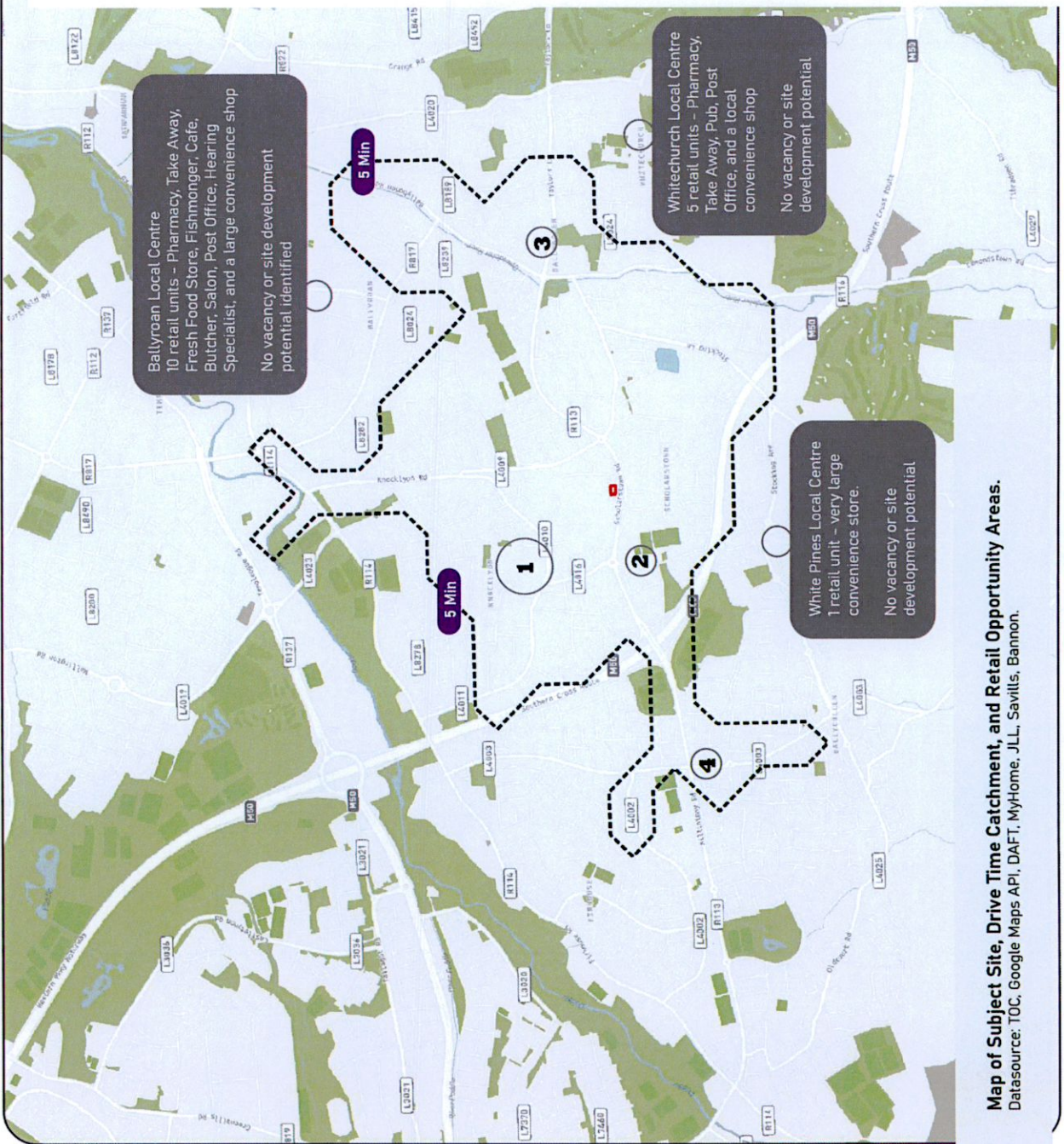
3 retail units - pharmacy, salon, and a local convenience shop.

No vacancy or site development potential identified

4 Level 5 - Local Retail Offering Woodstown Village

6 retail units - A local convenience shop, Pharmacy, Off-licence, Salon, Take away/Restaurant, Medical Centre.

No vacancy or site development potential identified



Map of Subject Site, Drive Time Catchment, and Retail Opportunity Areas.
 Datasource: T.C, Google Maps API, DAFT, MyHome, JLL, Savills, Bannon.

Petrol Stations with small convenience offerings have been omitted from study