

**D C W N E Y**

# **ECONOMIC STUDY & RETAIL IMPACT ASSESSMENT**

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**Proposed Strategic Housing Development  
on lands at Belcamp Hall (Protected Structure),  
Malahide Road and R139,  
Belcamp, Dublin 17**

**Applicant: Gerard Gannon Properties**

**April 2022**

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Downey Planning Document Control			
	Name	Date	Version
Prepared by	Elahe Saki MIPI Consultant Planner	01/02/2022	DRAFT_V01
	Elahe Saki MIPI Consultant Planner	15/02/2022	DRAFT_V02
	Elahe Saki MIPI Consultant Planner	28/04/2022	DRAFT_V03
Approved by	Eva Bridgeman MIPI and Donal Duffy MIPI Directors	28/04/2022	FINAL_V03



CHAPTER 1.

# INTRODUCTION



## 1.0 INTRODUCTION

### 1.1 Foreword

Downey, Chartered Town Planners, 29 Merrion Square, D02RW64 have prepared this Economic and Retail Study on behalf of our client, Gerard Gannon Properties, to inform the proposed development on lands at Belcamp Hall (a Protected Structure), Malahide Road and R139, Belcamp, Dublin 17. This is achieved by carrying out a comprehensive, evidence-based study of the existing retail environment catering for the proposed development, estimating the demand generated by the scheme, and identifying the capacity for retail provision within the area over a certain timeframe, when the delivery of the project and establishment of the trade is expected. This is noted to be supported by a review of the existing planning policy in relation to retail provision across various levels of national to local.

The Study also includes a Retail Impact Assessment which has been prepared in accordance with the advice provided by the Department of the Environment and Local Government (DoEHLG) in the *Retail Planning Guidelines for Planning Authorities* published in 2012, and in response to item 4 of An Bord Pleanála's pre-application consultation opinion letter issued in 14<sup>th</sup> January 2022, seeking "A Retail Impact Assessment, clearly demonstrating that the quantum of retail and commercial service proposed is sufficient to serve the proposed population within the site." As such, this report is submitted as part of the application for the proposed delivery of 2,527 no. residential units comprising 1,780 no. apartments, 274 no. duplex units, and 473 no. houses, 2 no. childcare facilities, retail/commercial provision, and all associated site infrastructure and engineering works necessary to facilitate the development.



Figure 1. Location of the Subject Site (approximate boundaries of the site outlined in red)



Figure 2. Aerial View of the Subject Site (approximate boundaries of the site outlined in red)

The Retail Impact Assessment indicates vitality and viability for the proposed retail provision and demonstrates that the proposal would result in an enhanced evenly-distribution of retail offerings, cut down on car-driven travels, increase in job opportunities, and would help to consolidate the long-term sustainability of retail and commercial activity within the area and with respect to the Key District Centre provisioned within Belmayne - Clongriffin within proximity to the subject site.

## 1.2 Proposed Development

The proposed development, as per the description contained within the statutory planning notices, provides for a ten-year permission for the proposed delivery of 2,527 no. residential units comprising 1,780 no. apartments, 274 no. duplex units, and 473 no. houses, 2 no. childcare facilities, retail/commercial provision, and all associated site infrastructure and engineering works necessary to facilitate the development.

## 1.3 Terminology of the Study

As mentioned earlier, the retail proposal within the scheme provides for an overall total of 4,424 sqm retail/commercial provision comprising a notable array of uses in both Fingal County Council and Dublin City Council's development areas. A breakdown of this retail/commercial provision across the scheme is provided within the Table below.



Table 1. Breakdown of Commercial/Retail Provision within the Scheme

Block	Description	GFA (sqm)
Block D	Café/Restaurant/7 no. Retail Units (Ranging from 55 sqm to 132.5 sqm)	1,020.5
Block F	Café/Restaurant/ 5 no. Retail Units (Ranging from 152 sqm to 208 sqm)	1,162
Block G	A Retail Unit	140
Block J	4 no. Retail Units (Ranging from 91.3 sqm to 144.7 sqm)	472
Creche	Childcare	606.7
Clubhouse	Changing Rooms	97
<b>FCC Sub-total</b>		<b>3,498.2</b>
Block 3	Café/Retail	417.8
Block 3	Creche	508
<b>DCC Sub-total</b>		<b>925.8</b>
<b>Total Retail/Commercial Provision</b>		<b>4,424</b>

With respect to the range of retail/commercial provision within the scheme and to facilitate the Retail Impact Assessment of the scheme, these service uses are specified as the following:

- **Retail Uses:** Retailers providing convenience goods, such as food, alcoholic and non-alcoholic beverages, and tobacco, and household non-durables.
- **Commercial Uses:** Retail offerings providing comparison goods, such as clothes, footwear, and household durables (both bulky and non-bulky).
- **Childcare Facilities:** Early childcare service provision which despite being calculated within the quantum of retail/commercial provision within the scheme, it has been excluded from the Retail Impact Assessment. For further information in this regard, please refer to the enclosed Childcare Provision Assessment prepared by Downey.
- **Leisure Services:** Service and activity-based uses such as restaurants/cafe, playing pitches and sports changing facilities building, etc.

#### 1.4 Methodology & Data Sources

Downey have aimed to undertake the Economic and Retail Study in a clear and methodical manner. It is agreed in principle that primary data, including statistically robust and validated national data sets, would be the preferred choice of data source subject to triangulation and validation where possible. A list of guidelines and data sets used in preparation of the following document is as below:

- *The StatBank of CSO Census databases;*
- *Census 2011-2016 Small Area Population Maps (SAPMAP);*
- *GeoView Commercial Property Report Q2 2021;*
- *GeoView Commercial Property Report Q4 2021;*
- *Guidelines for Planning Authorities; Retail Planning Guidelines 2012;*

- *Retail Strategy for the Greater Dublin Area 2008-2016;*
- *Fingal County Retail Strategy 2004;*
- *Dublin City Development Plan 2016-2022;*
- *Draft Dublin City Development Plan 2022-2028;*
- *Fingal Development Plan 2017-2023;*
- *Draft Fingal Development Plan 2023-2029;*
- *Clongriffin-Belmayne Local Area Plan 2012-2018 (extended until December 2022);*
- *Economic & Retail Study 2018 - Belmayne & Clongriffin prepared on behalf of Dublin City Council; and,*
- *A Research Study of the retail provision in the context of the proposed development carried out by Cushman & Wakefield and submitted under a separate cover as part of this SHD application.*

## 1.5 Structure of the Report

With respect to the foregoing context, this Economic and Retail Study is formulated within 4 parts, which are briefly outlined as follows:

- The first part sets out the planning policy context to this study in three scales of national, regional, and local levels;
- The second part details the existing retail/commercial environment to the proposed scheme which basically builds up the rationale to the retail/commercial provision within the scheme;
- The third part provides an overview of the proposed scheme, estimates the population generated by the scheme, and projects the demand for retail provision in the area considering the large scale of the proposed development; and,
- The fourth part, as the Retail Impact Assessment, assesses the capacity for retail and economic development in the area with regard to the projected population and latest available data on budget survey utilising the method introduced in Annex 5 of the *Retail Planning Guidelines (2012)*.

The key findings have then been highlighted within the last chapter of the study.



CHAPTER 2.

# PLANNING POLICY CONTEXT



## 2.0 PLANNING POLICY CONTEXT

### 2.1 National Legislation and Policy

#### 2.1.1 Project Ireland 2040 - National Planning Framework 2018

The National Planning Framework (NPF) is a high-level strategy that will shape growth and development in Ireland out to the year 2040. The NPF draws upon lessons learned from the National Spatial Strategy 2002-2022, and provides a framework for the sustainable development of Ireland's existing settlements, as an alternative to an uncoordinated 'business as usual' approach to development.

In terms of Ireland's future population, the NPF sets out a population target for the Eastern and Midland Region of 490,000-540,000 additional people by 2040, i.e., a population of around 2.85 million, with 75% of the growth to be outside of Dublin and its suburbs. Set out under National Policy Objective 1c, Eastern and Midland Region is expected to have around 320,000 additional people in employment, i.e., 1.34 million in total.

National Policy Objective 7 (NPO 7) calls for the strengthening of all levels of Ireland's urban structure, with a particular focus on the five city regions (Dublin, Limerick, Cork, Galway, and Waterford), large towns (>10,000 population), and small towns.

Some of the relevant National Policy Objectives are as the following:

**National Policy Objective 4** seeks to: *“Ensure the creation of attractive, liveable, well-designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”*

**National Policy Objective 5** seeks to: *“Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.”*

**National Policy Objective 7** seeks to: *“Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth.”*

**National Policy Objective 11** seeks to: *“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.”*

It is submitted that the proposed development is a mixed-use scheme designed to be well-integrated with its surrounding context by provision for public amenity space and with regard to its proximity to the Clongriffin-Belmayne Key District Centre. With the retail provision, it will also assist in creating employment and generating economic activity in the area, enhancing North Fringe retail provision so to take a further step towards implementing the concept of 15-minute city. Facilitating economic activities and employment growth would then provide for population growth, and help achieving the aforementioned policy objectives.

### 2.1.2 National Development Plan 2021-2030

The overarching aim of the National Development Plan 2021-2030 is to act as a driver for “Ireland’s long-term economic, environmental and social progress across all parts of the country over the next decade”. The NDP sets out the investment priorities that will underpin the implementation of the NPF, through a total investment of approximately €116 billion. This represents a very substantial commitment of resources which will provide essential infrastructure envisaged by the 10 National Strategic Outcomes (NSO).

### 2.1.3 Retail Planning Guidelines (2012) and Retail Design Manual (2012)

The Retail Planning Guidelines, which were first issued in 2000 and subsequently revised in 2005, and subsequently the third iteration of the Guidelines were published in 2012 accompanied by the Retail Design Manual (2012), providing the strategic policy framework for the spatial distribution of new retail development.

Therefore, the Guidelines provide a comprehensive framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and retailers and developers in formulating development proposals.

The Guidelines confirm that the key 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. It is vital *to establish the optimum location for new retail development which is accessible to all* sections of society and is of a scale which allows the continued prosperity of traditional town centres and existing retail centres and facilitates a competitive and healthy environment for the retail industry. This can only be achieved if strategic retail policies and proposals are incorporated into the development system. The guidelines also state that retail development can thus be guided by development plans.

The guidelines identify five key objectives, of equal weight, which are as follows:

- *to ensure that in future all Development Plans incorporate clear policies and proposals for retail development,*
- *to facilitate a competitive and healthy environment for the retail industry of the future,*
- *to promote forms of development which are easily accessible, particularly by public transport and in a location which encourages multi-purpose shopping, business and leisure trips,*
- *to support the continuing role of town and district centres, with*
- *a presumption against large retail centres located adjacent or close to existing, new or planned national roads/motorways.*

The RPG’s outline three core aspect which are to be evaluated when assessing a retail application, i.e., location, size, and impact. The RPG’s express that the preferred location of new retail development where practical and viable is within a city/town centre (or district/major village centre).

## 2.2 Regional Legislation and Policy

### 2.2.1 Regional Spatial and Economic Strategy (RSES) 2019-2031

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region is a high-level development framework for this Region that supports the implementation of the National Planning Framework (NPF) and the relevant economic policies and objectives of Government.

The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity. It also includes a Metropolitan Area Strategic Plan (MASP) for the Dublin metropolitan area.

The MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. The RSES notes that such corridors include the large-scale urban expansion on the North Fringe of the city.

The principles underpinning the development of the MASP include the effective integration of transport planning with spatial planning policies, from regional down to local level and the alignment of associated transport and infrastructure investment priorities. The key Regional Policy Objective applicable to the development proposal is the following:

***Regional Policy Objective (RPO) 5.3** – Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.”*

By provision for a notable array of retail uses and services, including additional floorspace of convenience and comparison retailing, and leisure activity including restaurant and bar, the proposed development is expected to achieve a vibrant mixed-use development which would also serve the area. The strategic location of the subject lands situating in proximity to Clongriffin-Belmayne Key District Centre and a regional road (R139) assures the accessibility of the site, and that the retail development complements the area by facilitating an evenly distribution of retail offers which would promote accessibility and walkability of these services.

Furthermore, the RSES outlines that the Retail Strategy for the Greater Dublin Area 2008 which was prepared by the Dublin and the Mid-East Regional Authorities is now dissolved. The retail hierarchy as expressed in the GDA strategy is substantially reflected in current city and county development plans and is presented here combined with the existing retail hierarchy in the remainder of the Region that was not included in the GDA. It is recognised that the floorspace thresholds detailed in the GDA strategy were prepared in a different economic climate and in many cases are still to be reached. In this regard, the EMRA will support and drive the preparation of a new retail strategy for the Region under the requirements of the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update. As per, **RPO 6.10** of the RSES states:



*“EMRA will support the preparation of a Retail Strategy / Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update the retail hierarchy and apply floorspace requirements for the Region.*

Additionally, **RPO 6.11** of RSES outlines:

*“Future provisions of significant retail development within the Region shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, and the retail hierarchy for the Region, expressed in the RSES, until such time as this hierarchy is updated.”*

The foregoing suggests though, there is a baseline and floorspace threshold for retail provision within GDA as provided by the Retail Strategy for the GDA, these elements need to be updated as per the current situation and requirements.

## 2.3 Local Legislation and Policy

### 2.3.1 Retail Strategy for Greater Dublin Area 2008-2016

The Retail Strategy for Greater Dublin area, which is also the reference document in both Dublin City and Fingal Development Plans, has identified future floorspace within the GDA, where the retail hierarchy of the development plans have identified where to allocate this need. However, this Retail Strategy is for up to 2016, mostly based on the pre-recession economic condition of the State. And therefore, it does not cover the changing economic environment of the county in the likes of employment growth or level of consumers disposable income, and particularly occurrence of COVID-19 pandemic which effectively changed the patterns of consumption and highlighted the need to provide for liveable town/village/urban district centres by prioritising qualities such as accessibility and walkability.

As mentioned, The Retail Strategy for the GDA outlines the broad retail floorspace projections for Dublin City Council up to year 2016. This is summarised in the Table below:

*Table 2. Retail floorspace Projections for Dublin City up to 2016 in GDA Retail Strategy*

Types of Goods	Gross Lettable Area (sqm)*	Net Area (sqm)**
Convenience Goods	38,586-46,303	27,010-32,412
Comparison Goods	181,258-296,601	126,879-207,621

\* Excludes mall/circulation space.

\*\* Estimated on basis of 70% of area being net sales space.

Based upon the observed level of construction to have taken place during the period 2008-2016, it is appropriate to assert that the majority of the projected floorspace, especially in respect of comparison goods shopping, was never built.

### 2.3.2 Dublin City Development Plan 2016-2022

The subject site is partially located within the functional area of Dublin City Council. The development of the site is therefore informed by the policies and objectives of Dublin City Development Plan. The policies and objectives of the Development Plan are underpinned by the following statement:

*“For the purposes of guiding this plan, both the long-term vision and the core strategy, as set out above, can be translated into three strongly interwoven strands:*

1. *Compact, Quality, Green, Connected City*
2. *A Prosperous, Enterprising, Creative City*
3. *Creating Sustainable Neighbourhoods and Communities*

*The core strategy will guide development in both policy and spatial terms. Delivered together, these priorities represent an integrated and holistic approach to the delivery of essential infrastructure and services within an over-arching sustainable framework.”*

The Development Plan identifies the areas of Clongriffin Train Station and Malahide Road junction, which are located within proximity to the subject lands, as the respective parts of the North Fringe East and West Key District Centre (KDC). Accordingly, *“The north fringe action area plan was first produced for the North Fringe lands in 2000, setting out the objective to extend the metropolitan core and create a new dynamic mixed-use urban quarter.”*

KDCs are designated as focal locations for the concentration of services within a particular area. They typically accommodate retail, office, community, cultural, public and leisure/entertainment functions for the local residential population. In order to encourage investment in KDCs the City Development Plan offers considerable flexibility in the type and scale of uses permissible.

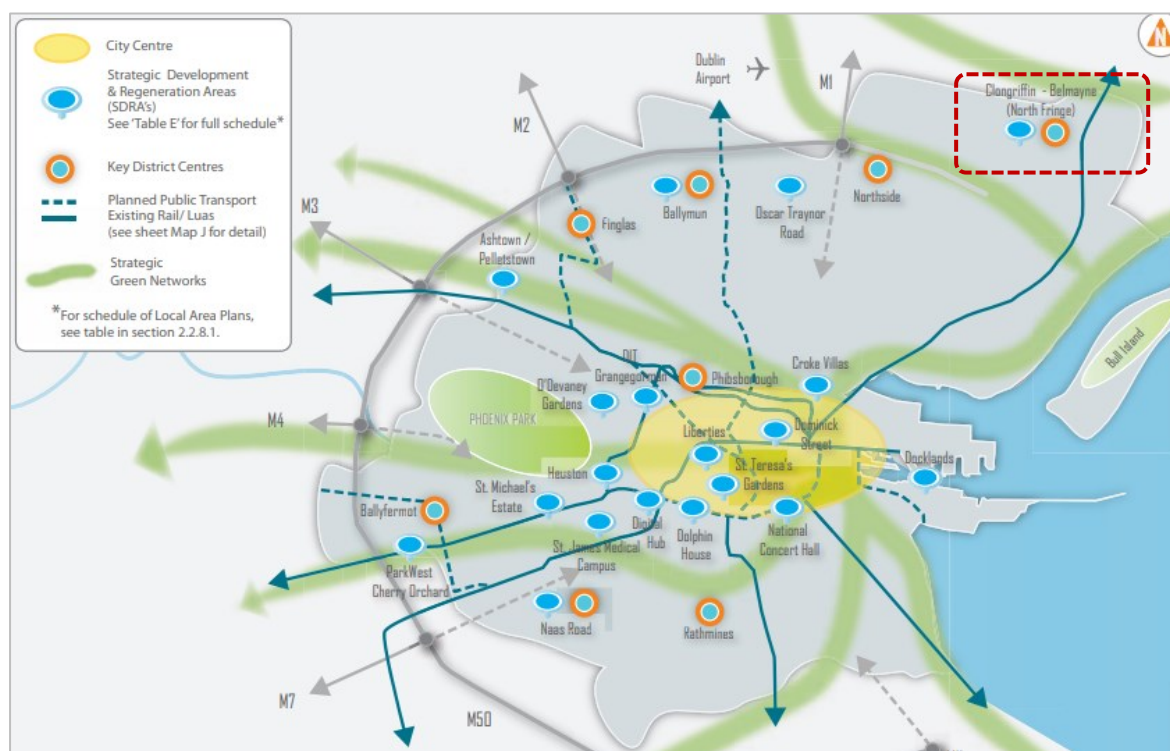


Figure 3. North-fringe Lands within the Core Strategy Map of the Dublin City (extracted from the CDP)

### 2.3.3 Draft Dublin City Development Plan 2022-2028

Considering that Stage 1 (pre-draft stage) of preparation of Dublin City Development Plan is completed for the time-being, the following study also acknowledged the Draft Development Plan, which is currently on the public display. It is important to note that at the time of preparing this SHD application, the Draft Development Plan has not been formally ratified by the Elected Members. Thus, until such time as this new Development Plan is prepared and adopted, the current Dublin City Development Plan 2016-2022 will continue to have effect.



Figure 4. Location of Subject Site within the Retail Strategy Map of the Draft Dublin Development Plan

The Draft Plan acknowledges the Retail Strategy for GDA, and that the Strategy is considered out of date and was written at a time of unprecedented growth in the Irish economy. It was based on data at a time of record in migration, economic growth, and expenditure. In this context, the floorspace projections are very ambitious, and also do not reflect the pivotal changes that have occurred in the retail sector, particularly in the last number of years with the growth of online sales etc.

The Plan suggests that in the interim, the Regional Spatial Economic Strategy (RSES), for the Eastern and Midland Regional Assembly, 2019 sets out a retail hierarchy for the Eastern and Midland Region and it states that it will support and drive the preparation of a new retail strategy for the region. However, for the purpose of the Development Plan and pending the preparation of a new retail strategy for the Region, a 'Retail Strategy' has been prepared for this development plan within Appendix 2 of the Plan.

As per the Appendix 2 of the Development Plan, convenience retailing (supermarkets) has expanded significantly in Dublin City over the last 10 years helped by population growth and policy support in the last development plan, specifically in the inner city. Therefore, it is the policy of the Council to



continue to promote the development of appropriately scaled convenience retail development in the city, particularly in new regeneration areas, and where such development can provide an important anchor to secure the vitality and viability of urban villages and neighbourhood centres.

Importantly, the Draft Plan states that retail development in suburban centres had little growth and expansion, and despite ambitious retail schemes in the likes of Ballymun Town Centre, Crumlin Shopping Centre, and Northside Shopping Centre were proposed, these permissions withered and were not considered viable after the economic crash. In some centres, there has been a contraction of retail floorspace and Crumlin Shopping centre is currently vacant with the exception of a convenience anchor and Ballymun Shopping Centre has been demolished. Other centres had a poor take up of retail floorspace, particularly Clongriffin, and the Point Village was not occupied by an intended anchor store. Traditional villages such as Finglas, Ballyfermot and Phibsborough have not seen any retail development of note in the last decade or so. The only centre that saw some enhancement of offer was the Omni Centre with the development of significant new convenience floorspace. The centre however, in recent times, has seen the closure of some comparison units.

This suggests taking a more flexible design approach towards retail floorspace provision within the northern parts, as to provide room for adaptable design would be the most optimum solution for the time-being.

#### **2.3.4 Fingal Development Plan 2017-2023**

The majority of the subject site is located within the Balgriffin Electoral Division and within the functional area of Fingal County Council. The development of the site is therefore informed by the policies and objectives of the Fingal Development Plan.

Outlined in the Development Plan, Balgriffin, as a previously rural settlement, has now become part of a growing population spreading from Baldoyle in the east to the as yet undeveloped area around Belcamp House to the west. As per, the Development Strategy for this area, as the context to the proposed scheme, seeks to consolidate the new and existing areas of Balgriffin and Belcamp to create vibrant residential communities with appropriate local services and community facilities to serve the new population.

**Objective BALGRIFFIN/BELCAMP 2** of the Development Plan seeks to: *“Ensure that new communities are adequately served with accessible local services.”*

It is submitted that the retail provision within the proposed scheme would assist in creating a mixed-use vibrant development appropriately serving the future residents of the scheme and the community residing in the wider area.

In a more strategic level and as asserted in Development Plan, the County’s population increased between 2011 and 2016 by 8.1%, a growth rate notably higher than the national average and the other Dublin Planning Authorities, and this trend expected to continue. Additionally, in 2011 Fingal was recorded as having the youngest population in the country, a higher than average proportion of children in the 0-14 years age group, and a lower than average proportion of single person households. Coupled with these population and demographic trends, are key economic trends that have implications for retailing policy. Following a number of years of contraction in domestic demand that

significantly dampened retail activity and spending, recent forecasts indicate recovering employment rates and increases in consumer disposable income levels.

**Objective ED35** of the Development Plan seeks to: *“Support and promote the sustainable development of the retailing sector throughout the County, with a particular recognition of the importance of SMEs to this domestic sector of the local economy.”*

It is also noted that the Fingal Retail Hierarchy has been devised having regard to the classifications of the Retail Strategy for the GDA and through ensuring consistency with the settlement hierarchy of the RPGs for the GDA. The Fingal Retail Hierarchy includes a categorisation of urban centres within the County into retailing levels, identifies the locations of each level, and the type of retail format that is considered appropriate for each level of the hierarchy.

**Objective ED36** of the Development Plan seeks to: *“Ensure that policies in relation to type, quantum and locations of retail floorspace provision are consistent with the requirements and recommendations of the relevant regional policy frameworks and national planning guidelines.”*

As specified under Retail Strategy for the GDA, total allocations for gross lettable floorspace need in convenience and comparison retailing in County Fingal are summarised in the Table below. It is noted that a 20% and 25% upward adjustment has been made to these projections as to facilitate future demand, in effect, to take cognisance of the fact that large retail developments, once granted permission, can often take a number of years to be constructed and be fully operational.

Council/Area	Convenience Gross Lettable Floorspace (sqm)*	Comparison Gross Lettable Floorspace (sqm)**
Fingal	58,115 sqm	110,118-150,248 sqm

\* Inclusive of 20% upward adjustment

\*\* Inclusive of 25% upward adjustment

The overriding policy approach for retail planning in the Development Plan is that new significant retail development should be directed primarily into the major town centres and town centres in the County (Level 2 and Level 3) and be in accordance with the scale, type and retail formats included in the Fingal Retail Hierarchy. However, as set out under **Objective ED38** of the Development Plan, any retail provision outside these centres:

*“Require that new significant retail development be primarily directed to the higher Levels in the Fingal Retail Hierarchy and specifically to the core retail areas identified for these centres. Only in exceptional circumstances (where the Planning Authority is satisfied that there are no sites or potential sites available either within the core retail area or on-the-edge of the core, and that the proposed retail development is necessary to serve the needs of the area) will proposed retail developments that are located outside of these centres and/or the core retail areas of these centres be positively considered.”*

Moreover, **Objective ED39** of the Development seeks to:

*“Ensure that applications for new retail development are consistent with the retail policies of the Development Plan, in particular with the Fingal Retail Hierarchy, and are assessed in accordance with the requirements of the Guidelines for Planning Authorities: Retail Planning, including, where appropriate, the application of the Sequential Approach, and requirements for retail impact assessments and transport impact assessments for retail developments which due to their scale and/ or location may impact on the vitality and viability of major town, town, local and village centres, while having regard to the impact such directions/ developments may have on the existing businesses operating within the area.”*

In the light of the foregoing, the following study provides a robust, evidence base to inform the retail provision within the proposed scheme.

### 2.3.5 Draft Fingal Development Plan 2023-2029

Considering that Stage 1 (pre-draft stage) of preparation of Fingal Development Plan is completed for the time-being, the following study also acknowledged the Draft Development Plan 2023-2029, which is currently on the public display. It is important to note that at the time of preparing this SHD application, the Draft Development Plan has not been formally ratified by the Elected Members. Thus, until such time as this new Development Plan is prepared and adopted, the current Fingal Development Plan 2017-2023 will continue to have effect.

The Draft Development Plan acknowledges the 5-tiered retail hierarchy provided by the RSES, having Swords, Blanchardstown, and Balbriggan as the Major Town Centres, followed by Malahide, Skerries, Charlestown, Rush, Lusk, and Donabate and the Town Centres, etc. This retail hierarchy, summarised in the Table below, helped informing the existing retail environment to the proposed scheme which is further discussed in the Section 3 of this study.

*Table 3. Fingal Retail Hierarchy (extracted from the Draft Development Plan)*

Level	Fingal Centres	Zoning Objective
Level 2	Swords, Blanchardstown, Balbriggan	Major Town Centre
Level 3	Malahide, Skerries, Charlestown, Rush, Lusk, and Donabate	Town Centre
Level 4	Blanchardstown Village, Mulhuddart, Clonsilla, Castleknock, Howth, Portmarnock, Baldoyle, Ongar, Sutton, Balrothery	Local Centre
	Applewood, Stapolin, Racecourse, Santry Demesne, Bayside, Castlemills, Carrickhill, Tyrellstown, Crowscastle Local Centre Roselawn and Rathbeale	Local Centre
Level 5	Kinsaley Village, Kinsaley/Feltrim Brackenstown, Holywell, Rivervalley, Seabury, Castlelands, Mountview, Hartstown, Huntstown, Carpenterstown, Boromhe, Ridgewood, Miller's Glen, Laurel Lodge, Corduff and Loughshinny, Holmpatrick Shopping Centre, Skerries Point Shopping Centre, Portrane	Local Centre
	Balscadden, Ballymadun, Naul, Garristown, Oldtown, Ballyboghil, Rowlestown, Coolquay and Rivermeade	Rural Village



It is noted that regarding the regional serviceability of the Swords Town Centre and its proximity to the site, it is expected for the emerging community to be partially catered by this town centre, in particular, for the comparison goods.

### 2.3.6 Clongriffin - Belmayne Local Area Plan 2012-2018 (as extended)

The Clongriffin-Belmayne Local Area Plan 2012-2018 (LAP) extended until 2022 “provides a framework for proper planning and sustainable development of Clongriffin-Belmayne (the North Fringe) area in accordance with the policies and objectives of the Dublin City Development Plan”. The lands around the North Fringe area were first proposed for development in 1999/2000 with the publication of an action plan to guide the development. “The two main objectives of the plan have been to provide a coherent urban structure with distinct identity and to integrate new and existing communities successfully”.

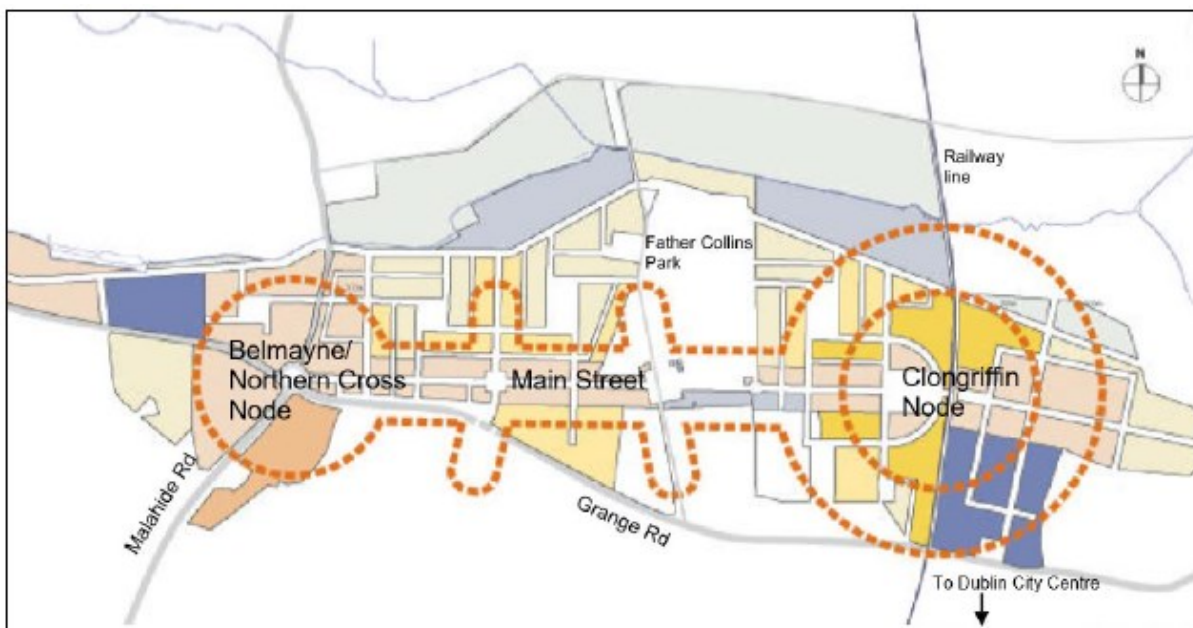


Figure 5. Commercial Nodes of Clongriffin and Belmayne/Northern Cross (extracted from the North Fringe Action Plan)

The LAP discusses how the proposed development of the North Fringe has progressed since the publication of the area action plan in 1999/2000. The LAP recognises that the North-Fringe is a growing area, and that considerable progress has been made on the provision of infrastructure in the area.

This includes:

- The completion of circa 3,400 homes to date;
- The provision of circa 41,000 sqm of commercial space;
- The construction of the Clongriffin DART station and the No. 15 Bus service, which uses the Malahide QBC and terminates in Clongriffin;
- Sewer and watermain services;
- Main street and distributor road networks;
- The construction of two primary schools;
- The completion of Fr. Collins Park; and,
- The completion of the park and ride facility and town centre plaza.

The LAP is designed to provide a strategy on how best to develop the area “in line with best practice in sustainable urban planning to meet the needs of all existing and future residents”. Regarding the zoning on the site, “the LAP is focused on the area zoned Z14 under the Dublin City Development Plan which is “to seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and “Z6” (enterprise and employment) would be the predominant uses”.

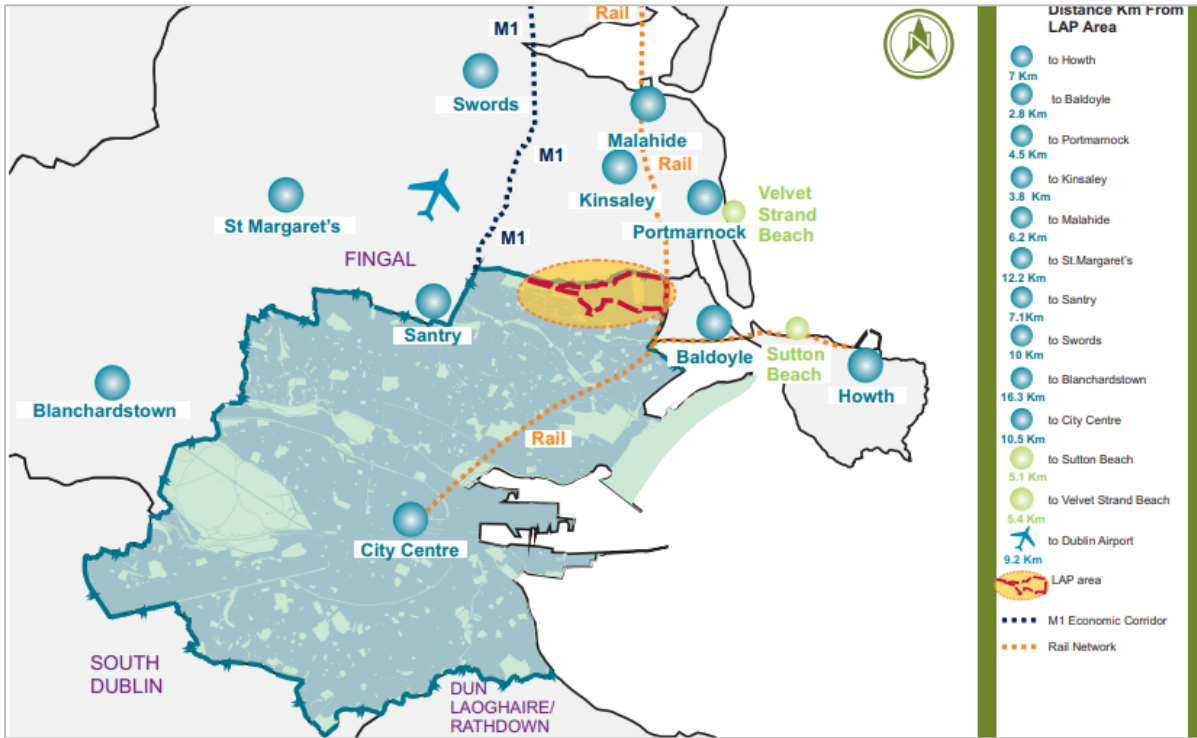


Figure 6. Strategic Location of Clongriffin-Belmayne LAP Area (extracted from the Clongriffin-Belmayne LAP)



CHAPTER 3.

# EXISTING RETAIL ENVIRONMENT



### 3.0 ASSESSMENT OF THE CONTEXT

#### 3.1 Site Location & Description

The subject site is located to the north of the Northern Cross Road (R139) and to the west of the Malahide Road, all on lands at Belcamp Hall (protected structure), Dublin 17, which is situated within the functional areas of both Dublin City Council and Fingal County Council. The total application area of the subject lands is approximately 67 hectares. The lands are greenfield in nature and currently in agricultural use.



Figure 7. Location of the Subject Site (approximate boundaries of the site outlined in red)

The application site is irregular in shape and is bounded to the east by permitted development Reg. Ref. F15A/0609 (ABP Ref. PL06F.248052), Reg. Ref. F19A/0220, and Reg. Ref. F19A/0221, currently under construction, by Belcamp Hall (protected structure RPS No. 463), and by Bewley's Tea and Coffee Head Office; to the west by undeveloped lands and by Craobh Chiarain GAA Pitches; to the north by undeveloped lands; and by Northern Cross Road (R139) to the south.

The lands that are subject to this planning application represent the completion of the Belcamp lands and will adjoin the Phase 1 development to the east. The site is currently accessed through the existing vehicular access from the Malahide Road (R132). Additional vehicular accesses are proposed as part of this proposal including from the R139 Road and the Malahide Road.

The subject site is located on the R139 and is served by local road networks with connections to the M1 and M50 which provides access directly into Dublin City Centre and to Belfast, as well as the R109 which provides access directly into Dublin City Centre. There are also bus connections to Dublin from the R107 with Bus Stop No. 4563 serving routes Nos. 15, 27, 27x, 42, and 43, which are within walking distance of the subject site. The Belcamp lands subject to this planning application are thus served by

a high-quality bus corridor connecting Dublin City Centre and Clongriffin Train Station, within close proximity of the subject site. There is a range of retail, health, community and commercial facilities in the immediate vicinity of the subject site, as well as a number of recreational amenities including parks and sports clubs.



Figure 8. Aerial View of the Subject Site (approximate boundaries of the site outlined in red)

### 3.2 Profile of the Application Site

To demonstrate the necessity and appropriate scale of retail provision within the proposed scheme, the following provides an overview of the characteristics of the application site within the context.

As mentioned earlier, the majority of the application site is located within the administrative area of Fingal County Council with parts of it situating within the administrative area of Dublin City Council. However, locational attributes and statistical characteristics of the site demonstrates the lands as mostly an urban district and natural extension to Dublin City rather than a town or village in County Fingal.

As an instance, Census 2016 indicates that 10,043 people were residing in Skerries, as a self-sustaining town in County Fingal, while Grange B ED population, as a settlement within Dublin City territory, stood at 5,326 in the same Census. Noteworthy to mention that the Grange B ED covers a much lesser area when compared to Skerries, which also reveals the density of development in these settlements.

Within such context, the proposed development is providing for an overall of 2,527 residential units to accommodate c. 8,841 people solely on the application site<sup>1</sup>. Therefore, while the majority of the site is located within the administrative area of Fingal County Council, the lands appear as a Dublin urban district by the reasons of density and type of development taking place in its immediate surrounding.

<sup>1</sup> This is calculated by applying the average household size of 3.5 which was recorded for the Balgriffin ED in Census 2016.



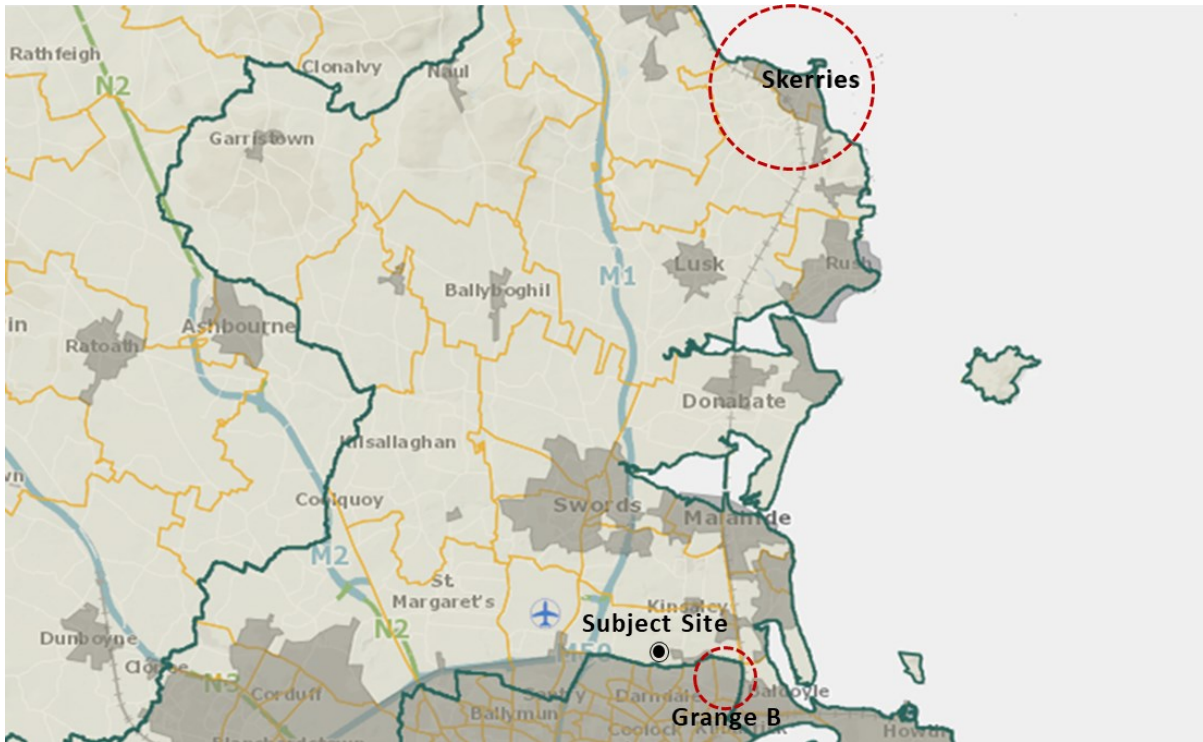


Figure 9. A Comparison of Settlements in County Fingal vs. Urban Districts in Dublin City

According to Census 2016, the population of Balgriffin stood at 3,113 with an overall of 712 no. household and an average household size of c. 3.5, which characterises the area by predominantly family-occupiers. It is noted that 12% of the households residing in the area are recorded as single-person households. The age profile of the area, as illustrated below, shows the greatest share of the population is for 30- to 40-year-old cohorts, while a notable share of the population is aged 0-9 years old. Therefore, the area is characterised by a young population.

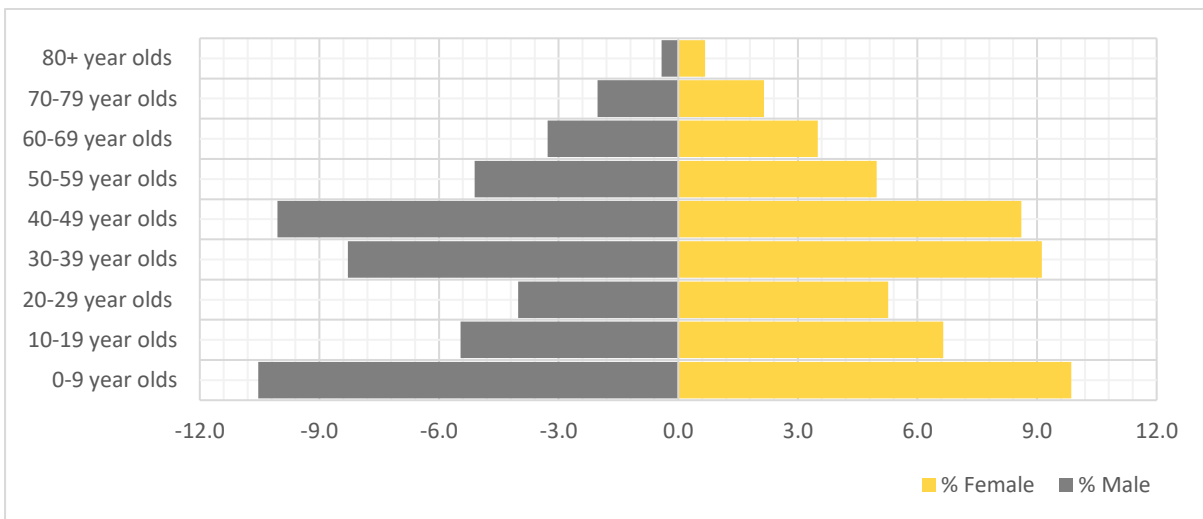


Figure 10. Age Pyramid of Balgriffin ED, 2016

Another element which would help establishing a better understanding of the context is the employment profile of the area. As shown below, notable levels of unemployment are recorded in the area, namely Priorswood A, B, and C, while Balgriffin itself is characterised with less levels of unemployment. Hence, studying the site location against the spatial distribution of the unemployed

over the latest Census confirms room for promoting developments of permanent job-generating nature, rather than relying on a solely residential development. The lands are also adjacent to the large IDA employment lands to the west, which will connect directly to these lands via the new East West Link Road (including cycle and pedestrian facilities), and also the existing commercial area of Northern Cross to the southeast, which also provides significant employment provision. These are within walking distance of the subject lands and thus avoid the need for car-based travel.

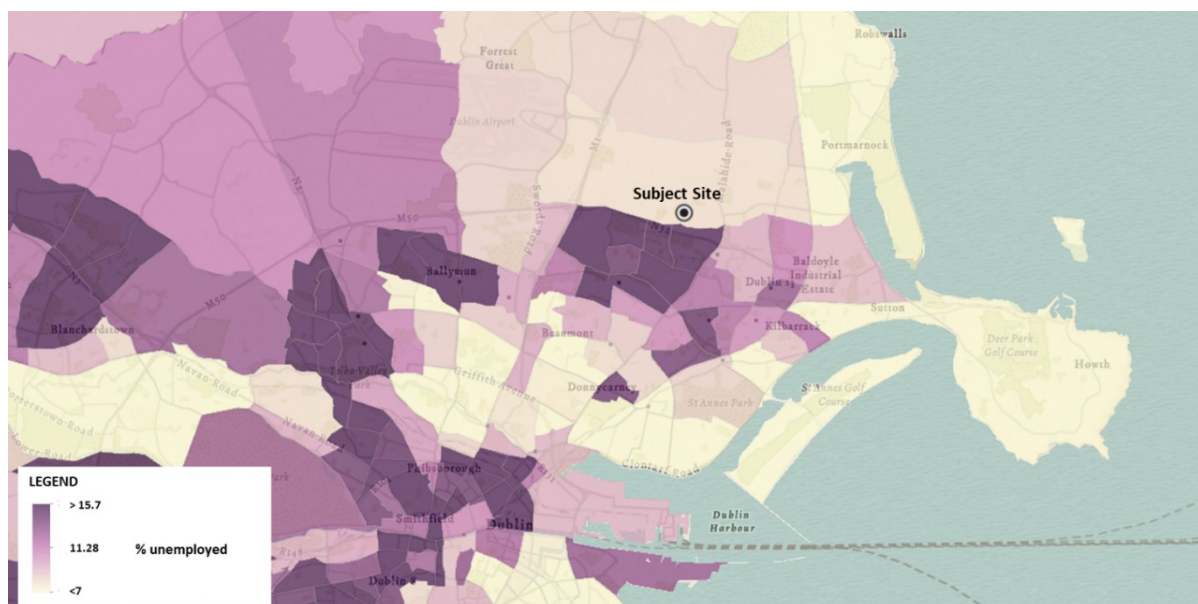


Figure 11. Spatial Distribution of Unemployment in the Area (subject site marked in black)

### 3.3 Existing Retail Environment

In order to provide an insight to the existing retail environment and to evaluate the likelihood or rather the possibility of future retail expansion in the subject site, as shown in the Figure below, the existing retailers have been identified and mapped out in a geographical scope extending from Dublin City Centre all the way up to Swords Town Centre. As illustrated below, this includes a wide range of retail provision comprising of Dublin City Centre and Swords Shopping Centre as the higher tier retail provision functioning in a strategic level, which is then further complemented by level 3 and 4 retail offerings as to enhance accessibility to retailers. Noted that the local-scale and neighborhood-level grocery retailers have also been marked on the map as level 5 retail provision, as they would further support the foregoing hierarchy of retail provision in the area. This includes the popular grocery retailers in the Irish market, in the likes of Tesco, Dunnes Stores, SuperValu, Spar, Centra, Lidl, Aldi, etc.

As illustrated below, the spatial distribution of level 3 retailers, mainly scattered in the outer layer of Dublin City, highlights both catchment area of the city centre and also the significance of proximity to main road. As shown, each urban district is served by a couple of level 3 retail provisions, which is further reinforced by level 4 retail offerings and local-scale retailers. However, the Clongriffin-Belmayne Main Street envisaged as a Key District Centre (level 3), and its proximity to Clarehall and Donaghmede Shopping Centres appear as there may be a certain degree of retail saturation in the area, which might result in competitive clustering in case of providing for the same level retail co-existence.



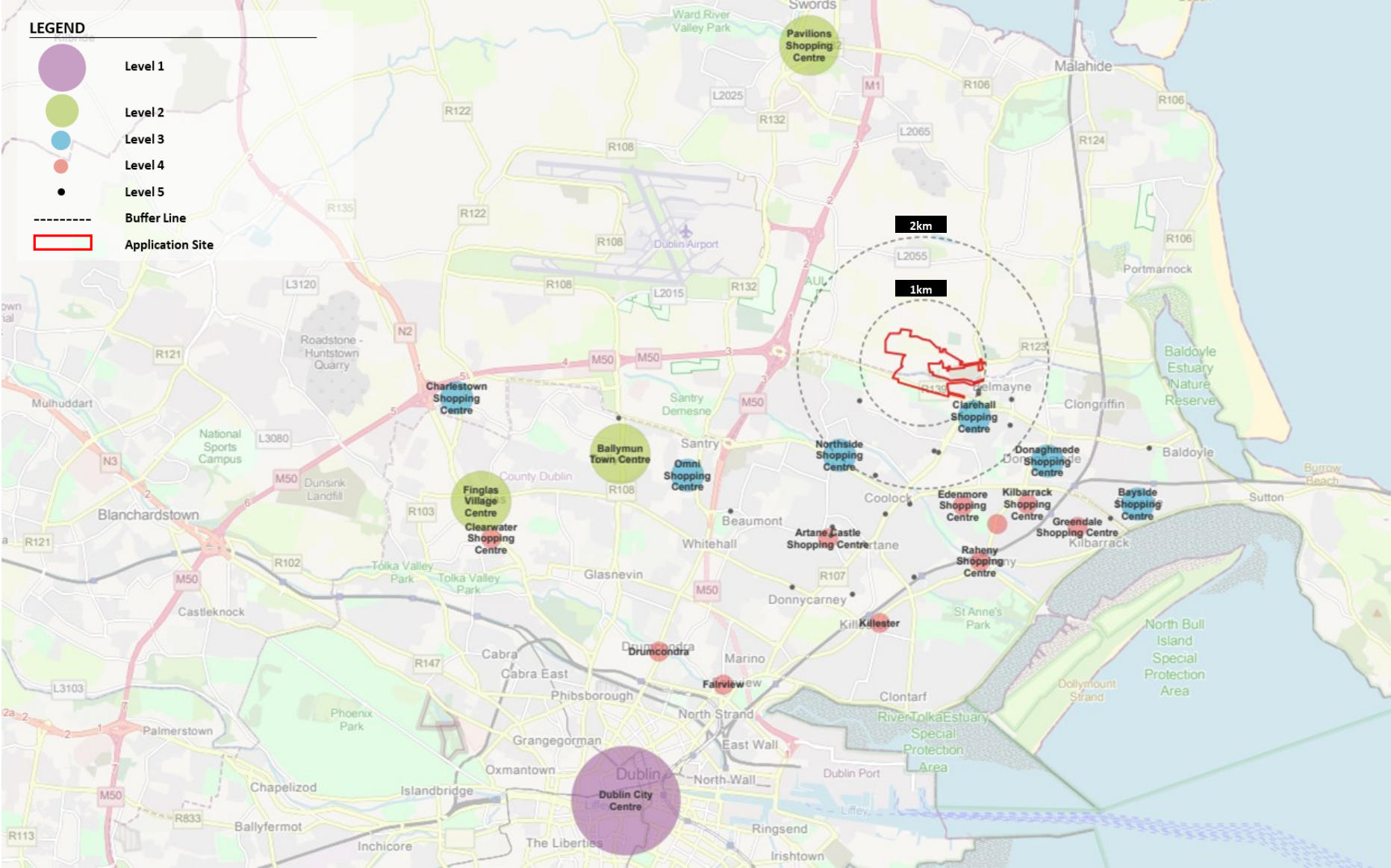


Figure 12. Subject Site Location within the Hierarchy of Retail Provision

Referring to the study done by Cushman & Wakefield, the retail landscape to the immediate surrounding of the proposed development is illustrated by key retail destinations listed in the Table below.

*Table 4. Key Retail Destinations Expected to Cater the Area*

Centre	Type	Approx. Size	Car Spaces	Grocery Anchor	Other Key Retailers	Distance from Belcamp
<b>Pavilions Shopping Centre</b>	Town Centre	45,500sqm	2,000	Dunnes Stores and SuperValu	Penneys, Zara, H&M, Next, River Island, Mango, Movies@Swords	8.6km
<b>Clarehall Shopping Centre</b>	District Centre	13,754 sqm	850	Tesco		1.9km
<b>Donaghmede Shopping Centre</b>	District Centre	17,190 sqm	600	Dunnes Stores	Holland & Barrett, Tiger, Kays Kitchen	3.1km
<b>Northside Shopping Centre</b>	District Centre	17,000 sqm	510	Dunnes Stores and SuperValu	New Look, JD Sports, Peter Mark, Costa Coffee	5.5km
<b>Northern Cross</b>	Street		On-street	Fresh		1.1km
<b>Clongriffin-Belmayne</b>						3.7km

*Source: Cushman & Wakefield*

Outlined in the foregoing study, *“the above demonstrates the significant volume of floorspace which already exists within the catchment of the site and is predominately comprised of convenience focused retailing, anchored by one of the majors, with the Pavilions Town Centre providing the significant comparison offering and representing the regionally dominant retail centre.*

*It is extremely important to look at the context of where retail has evolved. The Retail Planning Guidelines were last updated in 2012. Fast forward 10 years and there has been enormous change not only in how people shop but also how retailers are reaching their customers, a two year pandemic and a significant shift and focus towards a greener, more sustainable agenda are all combining to provide a much different picture to that of 2012...*

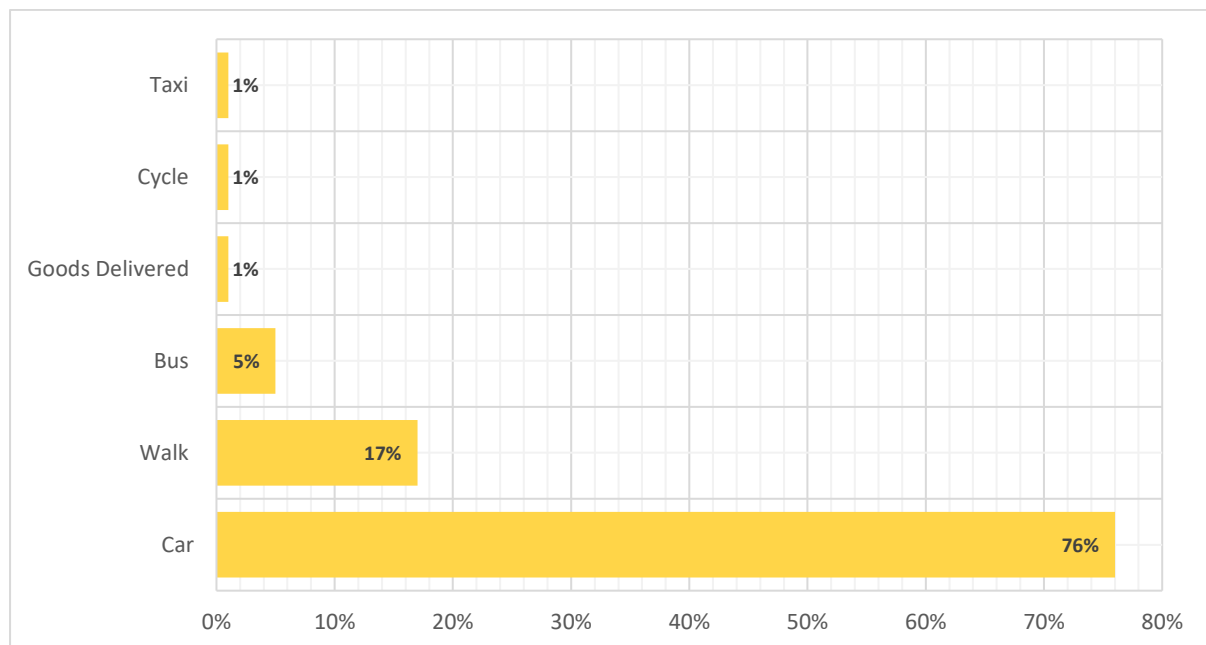
*... over the course of the last number of years a steady growth and demand from the convenience and grocery sector of the market which has seen demand increase based on lesser travel distances and increased convenience for the customer. Also, the last two years under which we have had a series of lockdowns has seen a move back by many consumers towards more traditional smaller retailing akin to ‘shopping local’ again.”*

Therefore, this pattern suggests that the Belcamp development site is located within an urban district, which following the existing pattern of retail provision in the area, would require a certain level of retailers to cater for its prospective residents. This is further reinforced when considering the

accessibility of the existing amenities from the subject site, as the application site is part of an urban district framed by the M1, R139, and R107 (Malahide Road)..

However, the presence of level 3 retailers in the area indicates a certain degree of saturation which might lead to excessive clustering in case of the same-level retail provision in the area, and this will ultimately impact profitability of the whole and prove detrimental in the long run even for the consumers. Thus, the existing retail environment suggests that a local-level retail provision to meet the emerging need from the proposed scheme would suffice for development at this stage.

It is also important to note that the car ownership rate in the area, as recorded on Census 2016, shows high levels of car-dependency, which is suggested to be partially driven by car-based grocery travels. Census 2016 shows that from the overall 712 no. households residing the Balgriffin ED, 46 no. household did not own a motor car, which indicates a car ownership rate of 93.5% for this area. It is noted that 42.5% of the households (or 303 no. households) own 2 motor cars in this area. Interestingly, the Household Survey carried out as part of Economic and Retail Assessment of Clongriffin-Belmayne LAP, as illustrated in the Figure below, confirms the same results.



*Figure 13. Means of Travel for Grocery Shopping (extracted from Economic & Retail Study of Clongriffin-Belmayne LAP)*

This is further supported by an accessibility analysis of the subject lands, which is illustrated in the Figure below. Accordingly, when generating the 20-minute walking distance from the centroid (geometric centre) of the lands, as the average start point of the travels from the site, then catchment area would cover Clarehall Shopping Centre and a number of retailers in the area, including SPAR, Centra, Fresh the Good Food Market, etc.

However, when running the same analysis for a 10-minute driving distance, then catchment area extends to include a much larger area with more retailers. This existing void in local-level retail provision in the area is submitted to further encourage car-dependent grocery travels which is not in favor of sustainable development in the long term. The proposed development will seek to address this.



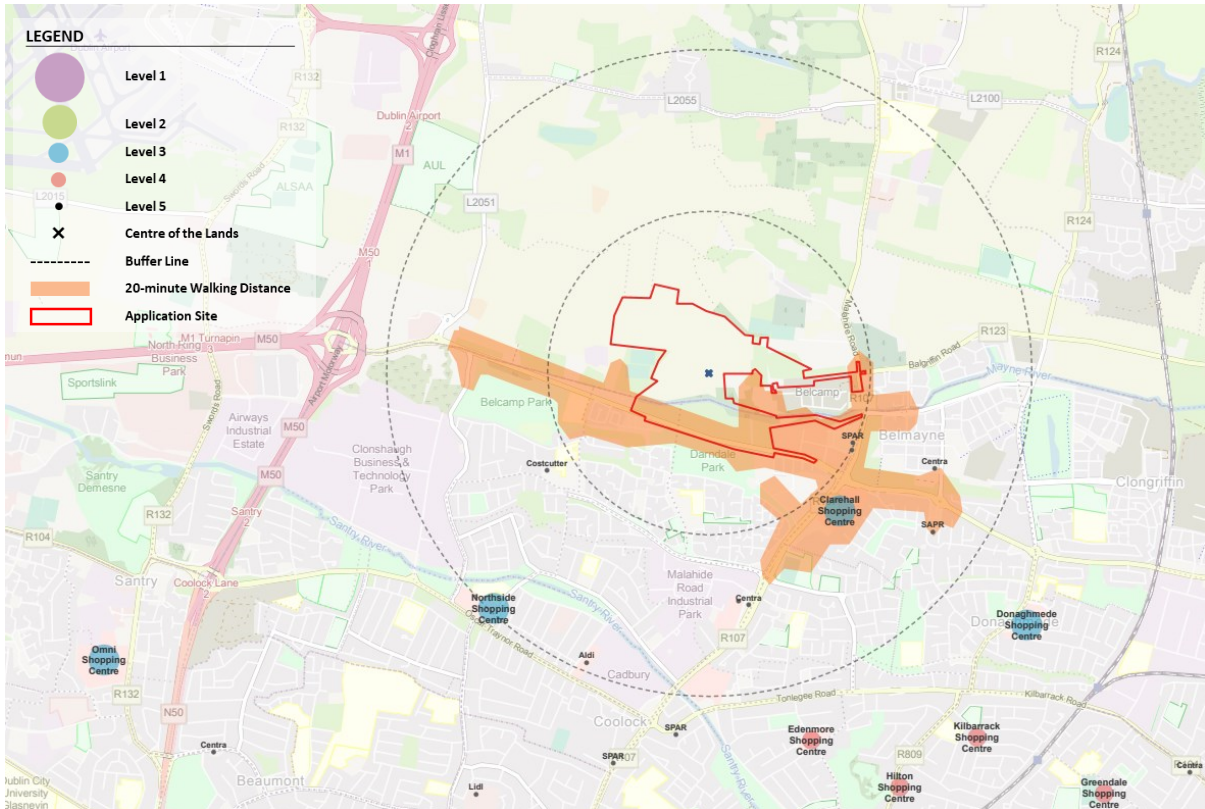


Figure 14. Existing Retailers within 20-minute Walking Distance from the Centre of the Lands

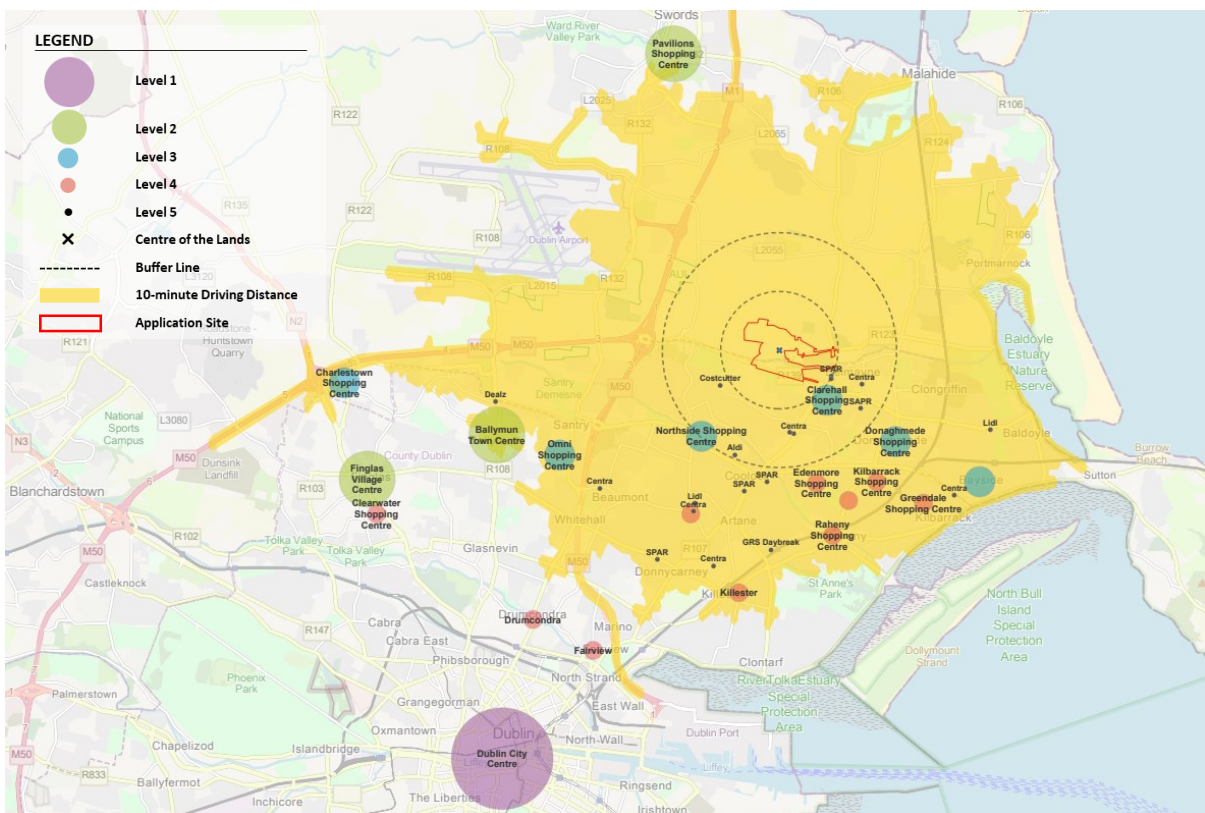


Figure 15. Existing Retailers within 10-minute Driving Distance from the Centre of the Lands



### 3.4 Commercial Vacancy Rates

The latest GeoView Commercial Vacancy Report, providing data up to Q4 2021 demonstrates that commercial vacancy rate in a national level stood at 13.9% in the year to Q4 2021, the highest level recorded by GeoDirectory in nine years of reporting. In total, there were 29,317 no. vacant commercial units dispersed across Ireland in Q4 2021.

As per the report, the national commercial vacancy rate increased by 0.4 percentage points to 13.9% in the year to Q4 2021 with an increase in commercial vacancies in 15 out of 26 counties. The highest commercial vacancy rates were recorded in the west of the country, continuing the trend observed in previous reports. Sligo, at 20.0%, was the county with the highest commercial vacancy rate, followed by Leitrim and Roscommon, both at 17.1%. In Q4 2021, the average commercial vacancy rate for Connacht was 17.3%. Meath (10.2%) was the county with the lowest commercial vacancy rate in the state, with Wicklow (10.4%) and Kerry (11.3%) also recording notably low rates.

In Dublin, the commercial vacancy rate increased by 1.0 percentage point in the year to Q4 2021, reaching a rate of 12.9%. This year-on-year increase was second only to Laois, which recorded a 1.1 percentage point increase to stand at 14.2%. As per, Dublin 2 recorded the largest year-on-year increase in vacancy, with a 3.1 percentage points increase to reach a vacancy rate of 16.8%, the highest across Dublin's postal districts. The Dublin postcode with the lowest vacancy rate was Dublin 16, at 6.8%. A total of 16 postal districts recorded an increase in their vacancy rates since Q4 2020.

Interestingly, the GeoDirectory compiled a nationwide sample of over 3,000 commercial units within 68 shopping centres and analysed the change in vacancy rates in these centres between 2016 and 2021. This analysis found that the total stock of shopping centre units remained largely static over the five years in question. However, the number of vacant units in shopping centres nationally increased from 429 in 2016 to 477 in 2021. This amounts to an 11.2% increase across the period analysed.

It is noted that as the full GeoView Commercial Vacancy Report is not available online for the time-being, the Q2 2021 was used to extract further details in relation to commercial vacancy in the vicinity of the subject lands. Accordingly, the closest post areas to the application site at Belcamp are Dublin 13 and Dublin 17. As illustrated in the Figure below, Dublin 13 experienced a slight decline in commercial vacancy by 0.2% standing at 11.7% in 2021. The same pattern of change is recorded for Dublin 17, where the vacancy rate decreased from 13.9% in 2020 to 12.9% in 2021.

The vacancies trending was also analysed by the economic sector, where the data is categorised based on the statistical classification of economic activities used within the European Communities (NACE codes). Accordingly, the number of NACE classified commercial units declined by 4,152 between Q2 2020 and Q2 2021.

The majority of this decline can be attributed to Retail and Wholesale, with a reduction of 1,931 units. Services continued to have the largest share of commercial address points with 49.1% of the total or 78,540 units. Within the Services sector, accommodation and food services accounted for the largest proportion of commercial units at 22,678 units or 28.9%.

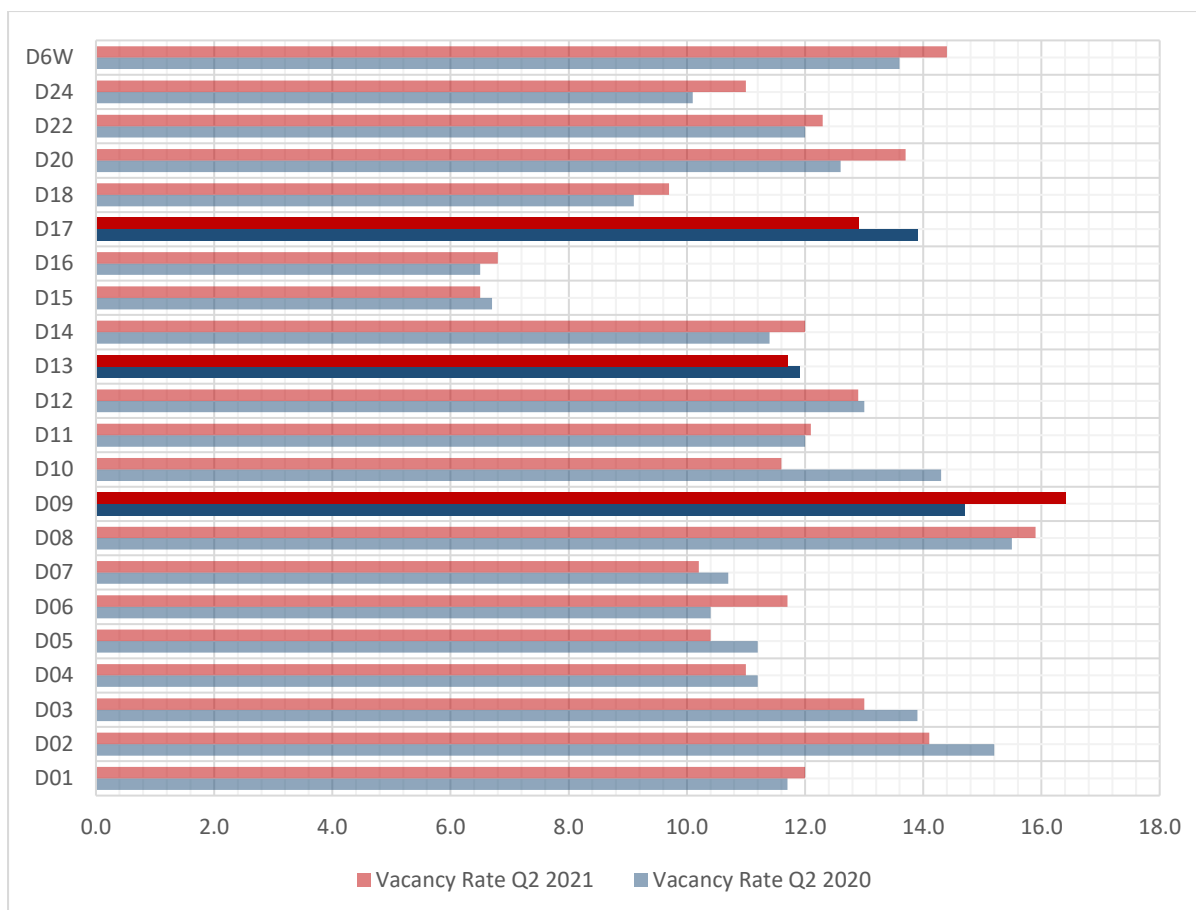


Figure 16. Vacancy Rates by Dublin District, Q2 2021

As to provide a more up-to-date overview of commercial vacancy in relation to the application site and its retail setting, Downey have also carried out an online search regarding vacant commercial units to rent in the above-mentioned shopping centres in late April 2022. The findings, as summarised below, reveals that there are a total of 7 no. vacant commercial units to let in Dublin 13 and 3 no. vacant commercial units in Dublin 17, providing for an overall total of c. 2,563 sqm vacant commercial units in the vicinity of the site.

Table 5. Commercial Properties Listed on Daft.ie for Rent, April 2022

Address	Area (sqm)
Unit 1.2 New Priory, Hole in the Wall Road, Donaghmede, Dublin 13	129.9
Unit 1A New Priory, Hole in the Wall Road, Donaghmede, Dublin 13	73.6
Unit 2 New Priory, Hole in the Wall Road, Donaghmede, Dublin 13	43.6
Unit 2A New Priory, Hole in the Wall Road, Donaghmede, Dublin 13	32.7
Main Street, Belmayne, Balgriffin, Dublin 13	1,000
Main Street, Clongriffin, Dublin 13	65
Unit 2, Malahide Road Retail Centre, Malahide Road, Dublin 17	918.9
Clarehall Retail Park, Clarehall, Dublin 17	233.5
Clarehall Shopping Centre, Malahide, Dublin 17	66.4

This provides an important factor in identifying the dynamic of the area and what suits better in terms of commercial/retail provision.



CHAPTER 4.

# DEMAND GENERATED BY THE SCHEME

## 4.0 DEMAND GENERATED BY THE SCHEME

Retail provision within the proposed scheme is outlined with regard to the two elements of:

- (1) serviceability, and
- (2) accessibility.

As per, serviceability is defined with respect to the catchment population of the retailer, where in this instance is based on the flux of population arising from the proposed scheme and the hierarchy of retail provision within the Retail Strategy for GDA 2008-2016.

To be more precise, the proposed development provides for an overall total of 2,527 no. residential dwellings, comprising of a mix of houses and apartments. The breakdown of these units are as follows:

Table 6. An Overview of Breakdown of Unit Types in the Proposed Scheme

Dwelling Type	Bedroom Provision	No. of Units
Apartments & Duplex Units	1 Bed	640
	2 Bed	1,045
	3 Bed	369
Houses	2 Bed	16
	3 Bed	385
	4 Bed	72
Total no. of Units		2,527

In the highest scenario and by assuming that all units will be occupied by families, applying an average household size of 3.5 to the overall number of units, it is considered that the proposed scheme at Belcamp may accommodate a maximum of 8,844 people.

However, an adjusted scenario would also take the house types into the account, providing for a more accurate estimation. In this scenario, single-bed apartments are foreseen to be occupied by young professionals and/or singles, therefore an average household size of 2 is applied to these units, while the rest of units are assumed to be family-occupied. Accordingly, the calculations would be as the following:

$$2,527 - 640 \text{ (single-bed apartments)} = 1,887 \times 3.5 = 6,604.5$$

$$640 \times 2 = 1,280$$

$$6,538 + 1,700 = 7,884$$

Based on the above, it is considered that the proposed scheme at Broomfield may accommodate a minimum of 7,884 people. Thus, it is expected for the proposed scheme to accommodate 7,884 to 8,844 people on the lands.

With respect to the Retail Strategy for GDA 2008-2016, this population threshold would best fit within the catchment population defined for a level 3 district or town centre, usually comprising of groups of



shops often containing at least one supermarket or superstore and a range of non-retail services, such as banks, building societies and restaurants, as well as local facilities such as libraries.

Within the foregoing category, a supermarket, which is suggested to appropriately cater for the anticipated population in the scheme, is defined as less than 2,500 sqm net food often with car parking, usually attracting a catchment of approximately 3,000 to 5,000 people. It is noted that in a higher tier, there would be a superstore providing for more than 2,500 sqm net food usually with car parking and a catchment population of 12,000 to 15,000 people. This suggests that provision for a supermarket up to 2,500 sqm net food would best cater the generated demand by the scheme, also is considered to be consistent with the existing guidelines.

We further submit that this approach is reasonable and appropriate given the substantial recovery in retail sales in recent years and the relatively inelastic nature of food shopping (being an essential requirement of people, unlike many other retail goods). This is further reinforced by the last two years under which we have had a series of lockdowns and consequently has seen a move back by many consumers towards more traditional smaller retailing akin to “shopping local” again.

To further support this with evidence, the CSO Retail Sales Index for December 2019 (two years earlier and pre-COVID) shows the volume of retail sales in December 2021 was 4.8% higher with several sectors showed significant changes compared to their corresponding level of sales in December 2019. The highest increases were seen in Furniture & Lighting (+22.5%), Pharmaceuticals, Medical & Cosmetic Articles (+19.8%), Hardware, Paints & Glass (+18.1%), Food, Beverages & Tobacco (Specialised Stores) (+17.7%) and Clothing & Footwear (+11.0%).

In terms of accessibility, the concept of 15-minute city, whereby people’s daily requirements can be reached within 15 minutes by foot has been utilised as the basis to the study.

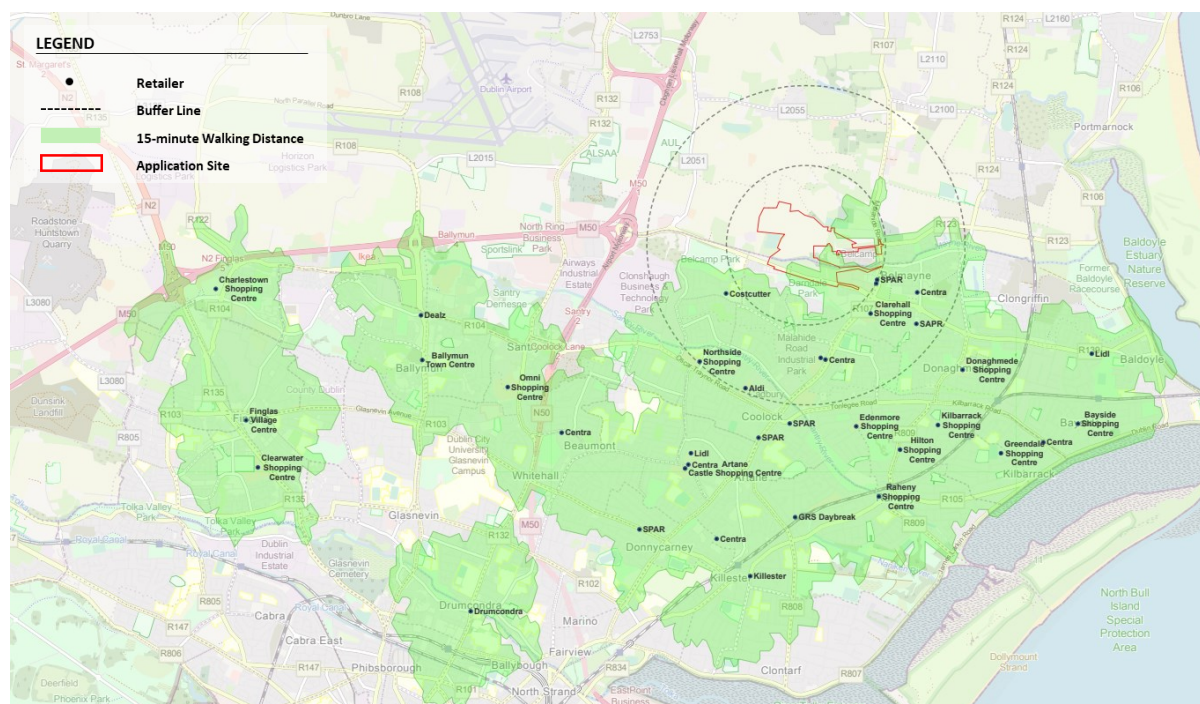


Figure 17. Accessibility Analysis of the Existing Retail Provision in the Area

As illustrated above, an indication of 15-minute walking distance from the existing retail provision within the area helps identifying the walkable distances from the retailers on the existing street network.

As shown, an overlap of these catchments, though demonstrating that major retailers are distributed evenly across the northern districts of Dublin, providing an appropriate level of accessibility for the residents, it does not extend across the application site, i.e., the existing retail provision in the area does not cater for the application site and its prospect residents in an accessible manner.

With regards to the above-mentioned and from a commercial point of view, the proposed scheme is expected to be amply catered when considering the Clarendon Shopping Centre as the key commercial destination for the emerging community. This is further supported by the Dunnes Stores in the Pavilions, Swords, and Donaghmede. This is also confirmed in the Cushman & Wakefield Report (refer to Appendix 1).

Thus, from a large-scale shopping centre point of view, it is suggested that the area is extremely well-served and there would be no rationale for the provision of any such covered mall experience in the Belcamp development. Instead, considering the accessibility to local level retail offerings, a mixture of neighbourhood style shops, comprising a smaller more convenient food, some non-service uses such as café, pharmacy, delicatessen, hair and beauty, and some additional commercial uses suggested within the scheme.

This is submitted to provide for a balanced mixed-use development when considering the large scale of the development, also promote accessibility to local level retails which prioritise sustainable development of the lands.



CHAPTER 5.

# RETAIL IMPACT ASSESSMENT



## 5.0 RETAIL IMPACT ASSESSMENT

The purpose of this Retail Impact Assessment is to model and analyse the capacity for additional retail/commercial floorspace that is supported by projected increase in available expenditure from the survey area, and to assess the proportion of this expenditure that is expected to be absorbed by the proposed retail provision. The robustness of any retail model relies on the suitability of parameters, the accuracy of data inputs and feasibility of assumptions. This section sets out the range of data inputs used to build up the model and explain any assumptions that have been used.

The Study also includes a Retail Impact Assessment which is in accordance with the advice provided by the Department of the Environment and Local Government (DoEHLG) in the *Retail Planning Guidelines for Planning Authorities* published in 2012, and as part of an application to An Bord Pleanála for development of 2,527 no. residential units comprising 1,780 no. apartments, 274 no. duplex units, and 473 no. houses, 2 no. childcare facilities, retail/commercial provision, and all associated site infrastructure and engineering works necessary to facilitate the development.

The *Retail Planning Guidelines* (RPG) require that an RIA 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 to be addressed in the RIA, and it be demonstrated whether or not the proposal would:

- a) Support the long-term strategy for the 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;*
- b) Have the potential to increase employment opportunities and promote economic regeneration;*
- c) Have the potential to increase competition within the area and thereby attract further consumers to the area;*
- d) Respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support;*
- e) Cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent development 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;*
- f) Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;*
- g) 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,*
- h) Link effectively with an existing city/town centre so that there is likely to be commercial synergy.*



## 5.1 Net Floor Area of Proposed Development

The proposed development provides for a total net area of 4,424 sqm, comprising of a total of 1,114.7 sqm childcare facilities, 2,733.3 sqm retail and/or commercial uses, 479 sqm bar and restaurant, and 97 sqm ancillary commercial (changing room). These retail/commercial units are proposed across the scheme, located within different character areas and of varied types and sizes to encourage activity within the proposal.

Table 7. Breakdown of Commercial/Retail Provision across the Scheme

Block	Description	Unit Area (sqm)
Block D	Café/Restaurant	260
	Retail Unit 1	116
	Retail Unit 2	141
	Retail Unit 3	55
	Retail Unit 4	96
	Retail Unit 5	117
	Retail Unit 6	103
	Retail Unit 7	132.5
Block F	Café/ Restaurant	219
	Retail Unit 8	152
	Retail Unit 9	196
	Retail Unit 10	194
	Retail Unit 11	193
	Retail Unit 12	208
Block G	Retail Unit 13	140
Block J	Retail Unit 14	144.7
	Retail Unit 15	9.3
	Retail Unit 16	91.3
	Retail Unit 17	144.7
Creche	Childcare	606.7
Clubhouse	Changing Rooms	97
<b>FCC Sub-total</b>		<b>3,498.5</b>
Block 3	Café	322.8
	Retail	95
	Childcare	508
<b>DCC Sub-total</b>		<b>925.8</b>
<b>Total Retail/Commercial Provision</b>		<b>4,424</b>

## 5.2 Timeframe of the Assessment

With respect to the amount of time required for completion of the planning process, infrastructure and engineering works, construction, and the establishment of a trade and market presence, it is estimated that it will take approximately 10 years for the proposed development to establish a pattern of trading. The design year is therefore assumed to be 2032.

Table 8. Indicative Phasing Programme for the Proposed Development

Description	Duration	Start-End Date
Infrastructure (Main Roads)	24 months	Q1 2023 - Q1 2025
SHD Phase 1	68 months	Q1 2023 - Q3 2028
SHD Phase 2	24 months	Q3 2028 - Q3 2030
SHD Phase 3	20 months	Q3 2030 - Q4 2032
<b>Fully operational as of December 2032</b>		

### 5.3 Catchment Area of the Assessment

This section will establish the catchment area of the assessment, i.e., the geographic area from which it is expected to be mostly affected with the proposed scheme. This is defined by utilising ArcGIS online and spatial mapping and analysis of the relevant data captured from CSO database. It is important to note that the definition of a catchment area is a matter of professional judgement based on experience, characteristics of the development context, and available information.

To define the catchment area of this assessment, it is initially assumed that an estimate area of up to 5km distance from the subject site would be considered as the spatial scope of the study. However, given the existing retail provision within the area, this spatial scope was then adjusted accordingly. More precisely, the convenience stores within the area were identified, and as shown on the Figure below, a catchment area of 1.5km distance (or 15 minutes walking distance) of these existing outlets was generated.

This limits the 5km distance of the application site from its southern boundaries, providing for an adjusted catchment area. Subtracting the 1.5km distance of the existing outlets nearby, the remaining is considered as the catchment area of the study. Noted that the purpose of this catchment area is to identify the general area from where the proposed development will derive its customers and should not be interpreted as definitive.

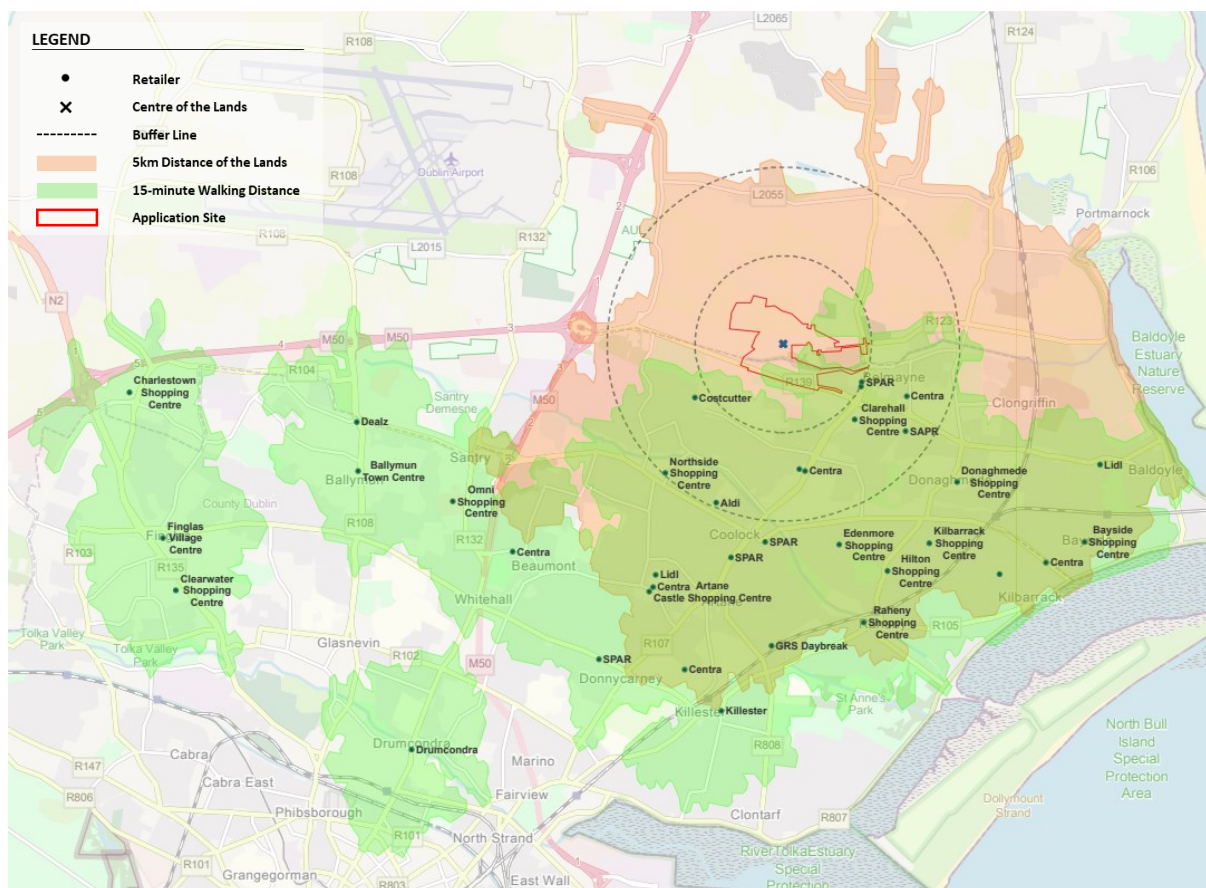


Figure 18. Catchment Area of the Assessment

## 5.4 Household Projection

Given that the Electoral Divisions do not completely fit within the catchment area of the study, the closest possible boundaries were utilised within the assessment. This defined the demographic scope of the assessment, as illustrated in the Figure below, to comprise of 8 no. ED's as the following:

- |                            |                                 |
|----------------------------|---------------------------------|
| 1) Balgriffin ED (04005)   | 5) Grange A ED (02059)          |
| 2) Priorswood A ED (02080) | 6) Grange B ED (02060)          |
| 3) Priorswood B ED (02081) | 7) Baldoyle ED (04004)          |
| 4) Priorswood C ED (02082) | 8) Portmarnock South ED (04032) |

According to the latest Census data, a total population of 37,870 people, or 12,625 no. households are residing within this catchment area. This provides for an average household size of 3.0 for the area.

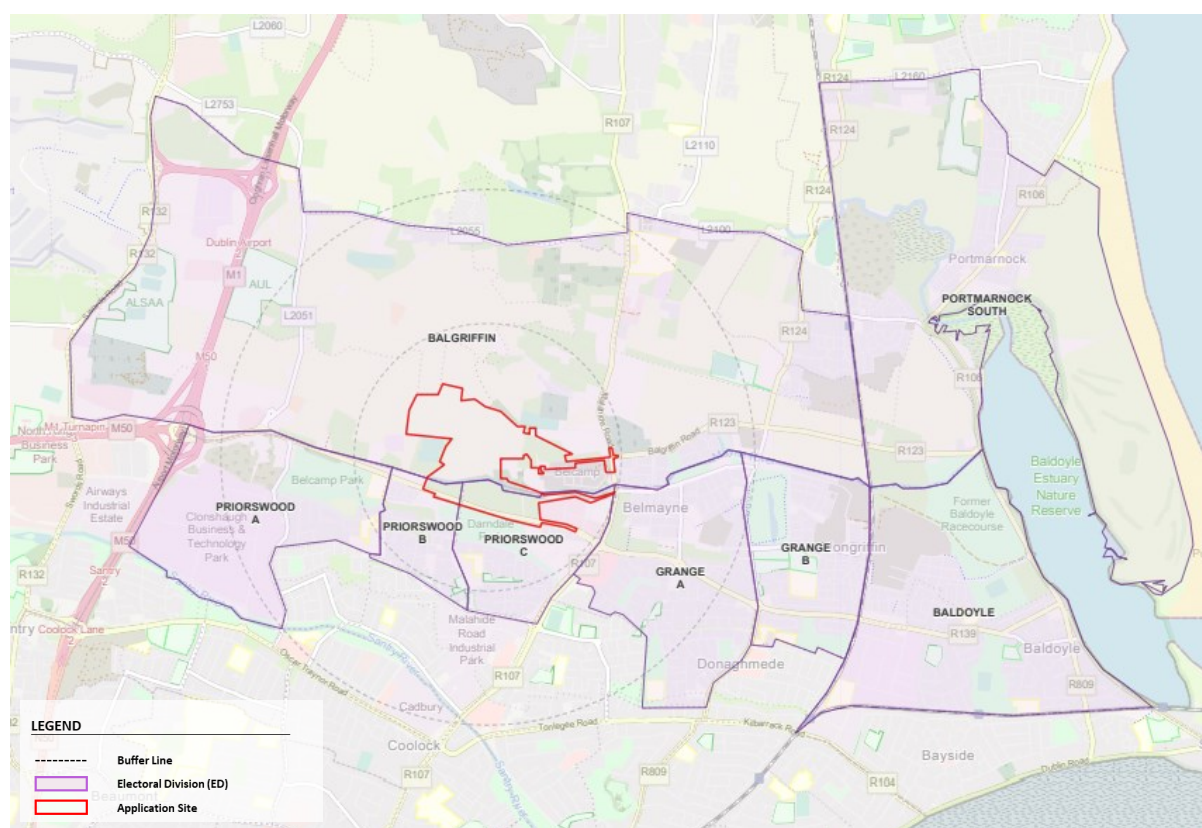


Figure 19. Demographic Scope of the Assessment

In terms of household projections, the Census 2011 for the foregoing ED's were utilised as to identify the growth trend in a year-by-year basis. As per the CSO StatBank, the catchment area had a total of 11,983 no. households in 2011, and 12,625 no. households in 2016. This provides for a growth rate of 5.4% over the intercensal period, which illustrates an average annual growth rate of 0.9% over this period.

With respect to this growth rate, and assuming a continuation of prevailing demographic trends within the catchment area, then the annual growth rate of 0.9% was applied to the area's household counts in the most recent Census. The results are summarised in the Table below.

Table 9. Household Projection by Applying an Annual Growth Rate of 0.9% Captured from 2011-2016

Year	Households	Growth Rate
2011	11,983	-
2016	12,625	5.4
2017	12,738	0.9
2018	12,851	0.9
2019	12,966	0.9
2020	13,082	0.9
2021	13,199	0.9
2022	13,317	0.9
2023	13,436	0.9
2024	13,556	0.9
2025	13,677	0.9
2026	13,799	0.9
2027	13,922	0.9
2028	14,046	0.9
2029	14,172	0.9
2030	14,298	0.9
2031	14,426	0.9
2032	14,555	0.9

## 5.5 Expenditure per Household

With respect to the typology of retail goods provisioned in the *Retail Planning Guidelines 2012*, the proposed retail uses comprise of both convenience store, providing for “food, alcoholic and non-alcoholic beverages, tobacco, and non-durable household goods” and comparison store, providing for “clothes and footwear, and durable goods”. Thus, to estimate the household’s expenditure up to 2032, the latest data on household’s spend on convenience goods was captured from CSO database. Noted that the most recent data available on CSO database is for 2015 as summarised in the Table 10 below. This provides for an overall average yearly expenditure of €11,798 on convenience and comparison goods.

Table 10. Average Weekly Household's Expenditure, 2015

Expenditure type	Value (€)
Total food	129.75
Total drink and tobacco	33.72
Total household non-durable goods	17.57
Total clothing and footwear	35.6
Total household durable goods	29.16

Source: CSO database

## 5.6 Expenditure Growth

Household’s expenditure, and consequently personal consumption of goods and services is expected to grow annually in the coming years. As illustrated in the Table below, despite an ever-growing trend since 2015, Personal Consumption Expenditure (PCE), a measure of consumer spending on goods and



services, fell by 10.4% in 2020, with the largest pandemic effects impacting spending on restaurants and hotels, foreign travel, transport and spending on recreation and culture. This is suggested to be recovered in the following years, particularly with respect to the mounting levels of Gross National Income and Gross National Savings recorded for the same year, i.e., +2.5% and +10.4% respectively.

*Table 11. Estimation of Household's PCE over 2015-2032 in the Dublin Region*

Year	2015	2016	2017	2018	2019	2020	2021	2032
Growth Rate	3.9	5.4	3.3	5.9	5.4	-10.4	4.78	4.78
Total Available Expenditure (€)	11,798	12,436	12,846	13,604	14,338	12,847	13,461	22,498*

\* This is calculated by applying the annual growth rate of 4.78 to 2021-2032, though full details have not been included in the table herein.

With regard to the above, the basis for estimating the household's PCE over 2021-2032 is the average growth rate over 2015-2019. Considering the gradual ease of COVID-19 restrictions on the retail and commercial uses and activities and growing levels of disposable income over the same year, the drastic decline over 2020 has not been accounted within the calculation of PCE growth rate. And the same growth rate of 4.78 was utilised within the estimations 2021 onwards.

As illustrated above, CSO database recorded annual growth rate of PCE over 2015-2019 for Dublin Region, which provides for an average of +4.8% over this period. However, this drastically dropped to -10.4% over 2019-2020 which is a consequence of COVID-19 outbreak. Therefore, assuming the continuation of prevailing PCE growth trends within the catchment area over 2015-2019 regardless of pandemic impact, the household's PCE is anticipated to reach €22,498 in 2032.

## 5.7 Total Available Expenditure

With an anticipated household increase to 14,555 by 2032, and an estimated households increased PCE up to €22,498 in the Dublin Region, the pool of PCE in the catchment area is expected to be €327M in 2032. It is noted that no growth is included over 2020 and 2021 in light of the Covid-19 pandemic.

## 5.8 Turnover Estimates of the Proposed Development

The proposed development would comprise 2,733.3 sqm of retail and commercial uses. The Retail Strategy for the GDA estimates turnover ratios achieved by shops at circa €12,000 per net sqm for convenience goods and circa €9,000 per net sqm for comparison goods. This would provide for an average of €10,500 per net sqm for retail and/or commercial use, i.e., providing for both convenience and comparison goods.

There is also a general acceptance within both the retail and transport planning industries that trip rates per 100 square metres (GFA) decrease as the overall quantum of floor area increases. This has the effect of compressing overall sales density figures for larger stores.

It is therefore assumed that the proposed convenience store will have a sales density of €9,450/sqm, which is 90% of convenience and/or comparison goods retailers, increasing to €11,081/sqm by 2032 in line with a trading efficiency growth rate of 1% per annum, as a conservative scenario.

Table 12. Estimated Turnover of the Proposed Convenience Store by 2032

Gross Floorspace	Sales Density 2016	Sales Density 2032	Total Turnover 2032
2,733.3 sqm	€9,450/sqm	€11,081/sqm	€30M

Accordingly, it is anticipated for the proposed retail and/or commercial uses within the scheme to achieve an overall turnover of €30M by 2032 (the assessment year).

## 5.9 Gross Additional Turnover Potential

It is suggested that Clarehall Shopping Centre is the key retail destination to the proposed scheme, as it is located in 2km radius from the lands, and within the demographic scope of the project. It is acknowledged that Donaghmede Shopping Centre and Northside Shopping Centre are the next key retail destinations, however, they are located beyond the 2km radius and demographic scope of the assessment.

Also, from a user point of view, there is lesser chance of passing Clarehall Shopping Centre to reach either Donaghmede or Northside Shopping Centres. It is submitted that this is also more in line with the emerging consumers habits, specifically over the past two years, where there is a move back to the shopping local.

With respect to the foregoing and as illustrated in the Table below, Clarehall Shopping Centre, as the existing retail provision catering the demographic scope of the assessment, indicates an overall turnover of €154M by 2032 when applying sales density of €11,081/sqm to its overall area.

Table 13. Estimated Turnover of Existing Convenience Provision by 2032

Retail Centre	Area (Convenience/ Comparison net sqm)	2016 Turnover	2032 Turnover
Clarehall Shopping Centre	13,754sqm	€130M	€154M

When compared to the available expenditure by the assessment year, it is concluded that there is an under-provision of convenience and/or comparison floorspace within the catchment area, where there is c. €143M pool of available expenditure, i.e., by 2032 the addition of approximately 12,927sqm of convenience and comparison retail within the catchment area is required to meet the available expenditure.

It is important to note that the aim of retail planning is to ensure that at a minimum there is sufficient facilities to cater for expenditure rather than to match provision with expenditure. Since this would likely lead to leakage from the catchment to surrounding centres, which is not in keeping with retail planning objectives to provide local facilities, therefore local provision as part of the application is justified.

## 5.10 Capacity for Additional Floorspace

The foregoing capacity modelling exercise illustrates that there should be adequate additional available expenditure generated from the survey area to support the proposed retail provision within

the scheme by 2032 without incurring impact on the trading performance of the existing retail provision, but also enhance the retail provision within the area.

*Table 14. Floorspace Capacity in the Catchment Area in the Design Year*

<b>Component</b>	<b>Convenience/Comparison</b>
<b>Gross Available Expenditure</b>	€327
<b>Turnover Estimated for the Proposed Development</b>	€30M
<b>Gross Additional Turnover Potential</b>	€154M
<b>Available Expenditure</b>	€143M
<b>Capacity for Additional Floorspace</b>	12,927 sqm

The above table illustrates that when taking the proposed development into account, there will remain space capacity for additional floorspace in the catchment area in the short term. Therefore, it is our professional planning opinion that there is a quantifiable need for additional convenience floorspace such as that proposed herein at Belcamp, at a scale and offering to meet the local need of the future residential community.



CHAPTER 6.

# CONCLUSION



## 6.0 CONCLUSION

Downey, Chartered Town Planners, have prepared this Economic Study and Retail Impact Assessment on behalf of our client, Gerard Gannon Properties, to inform the proposed SHD development on lands at Belcamp, Northern Cross, Dublin 17. This is achieved by a comprehensive review of the existing planning policy, investigating the profile of the context to the proposed scheme, quantifying the retail requirements of the area by capacity modelling of the area over a certain timeframe and assessment of the retail impact for the proposed retail provision.

The proposed development provides for a total net area of 4,424 sqm, comprising of a total of 1,114.7 sqm childcare facilities, 2,733.3 sqm retail and/or commercial uses, 479 sqm bar and restaurant, and 97 sqm ancillary commercial (changing room). This is achieved with respect to the two elements of, (1) serviceability, and (2) accessibility, i.e., meeting the flux of population arising from the proposed scheme considering the hierarchy of retail provision within the Guidelines, and establishing a walkable development were the two drivers behind the proposed retail provision. It is also noteworthy to mention that the pre-planning consultation stage with both local authorities also informed the proposed quantum of retail provision within the scheme, which is mostly driven by the large scale of the development and the population it can bring to the area.

This is further supported by the capacity modelling of the study area in terms of estimating its overall available expenditure for retail and commercial uses up to 2032 which is defined as the indicative phasing programme of the scheme. As per the study area comprising of Balgriffin, Priorswood A, Priorswood B, Priorswood C, Grange A, Grange B, Baldoyle, and Portmarnock South ED's are anticipated to have 14,555 no. households in 2032, when assuming a continuation of prevailing demographic trends. With an expected available yearly expenditure of €21,437 in 2032, a pool of €225M is estimated as the available expenditure in the area on retail and/or commercial uses. This illustrates an existing financial capacity in the area which supports the proposed retail provision within the scheme. On the other hand, it is expected for the retail provision within the scheme to achieve a turnover of €30.5M. In addition to the expected turnover of €154M for Clarehall as the closest key retail destination to the application site, the assessment suggests that there is still capacity of c. €40.5M for retail and/or commercial provision in the catchment area.

It is crucial to note that the estimations provided in the following assessment are all based upon the latest available data which dates back to Census 2016 and 2015 households budget survey. On foot of recent changes and specifically COVID-19, which effectively impacted the consumers' shopping patterns and has built up new habits, it is suggested that the estimations are not fully reflective of the reality happening on the ground.

Therefore, it is our professional planning opinion that there is a quantifiable need for additional convenience floorspace such as that proposed herein within the catchment area, specifically that the proposed retail provision in the scheme is submitted to be mainly of a day-to-day basis and to cater for the emerging local community.



CHAPTER 7.

# APPENDICES

# Appendix 1. Cushman & Wakefield Report



164 Shelbourne Road  
Ballsbridge, Dublin 4  
Ireland  
Tel +353 (0)1 639 9300  
cushmanwakefield.ie

Ms Susan Clafferty  
Gannon Homes Limited  
Kinvara House  
52 Northumberland Road  
Ballsbridge  
Dublin 4  
D04 A665

8<sup>th</sup> April 2022

## Re: Proposed Strategic Housing Development on Lands at Belcamp, Northern Cross, Dublin 17

Dear Susan,

I refer to the above and the request to provide commentary in relation to the proposed commercial provision within the overall development.

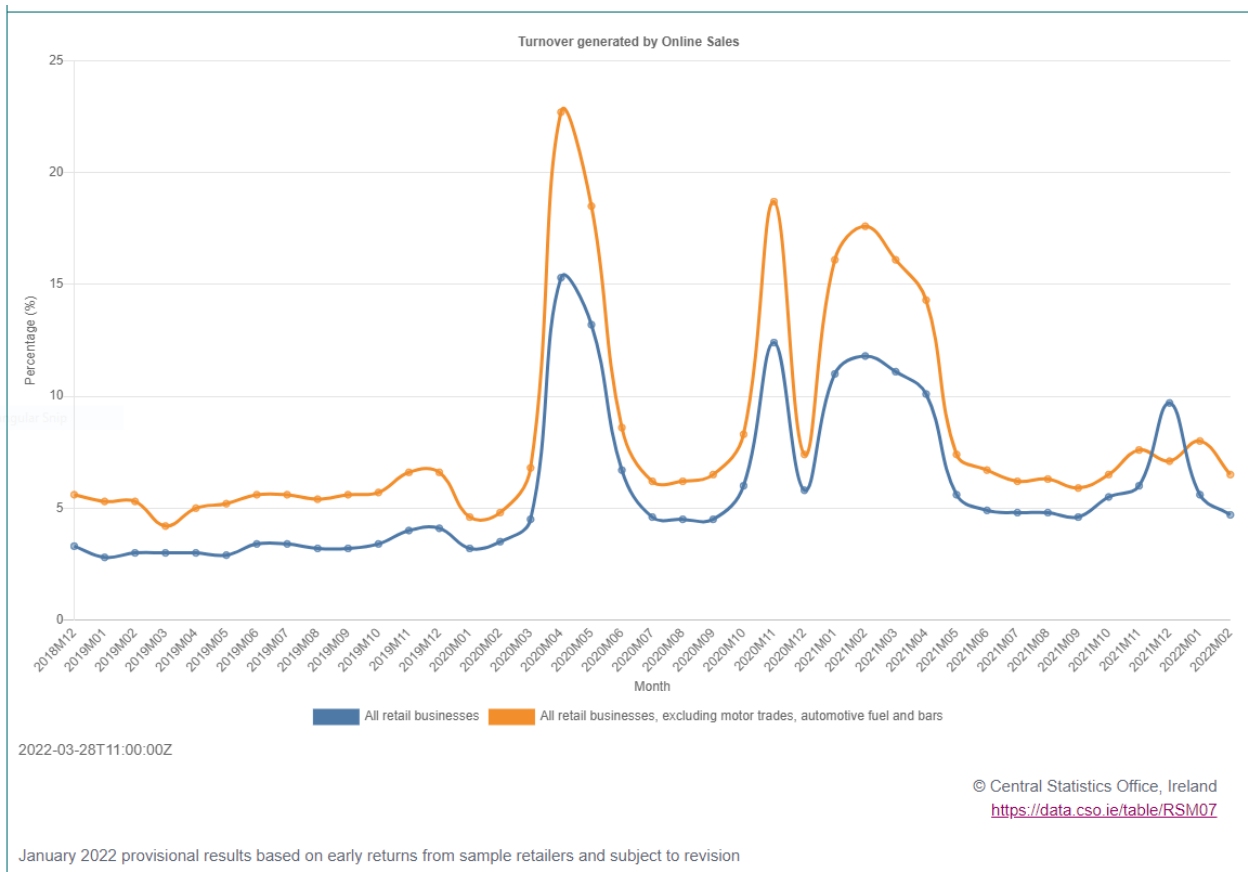
Before examining the specifics of the proposed development, it is important to understand the retail landscape immediately around the Belcamp area and the key retail destinations which already exist. The table below highlights the main retail centres which exist and the distance from the proposed site.

Centre	Type	Size – Sq.M (Approx)	Car Spaces	Grocery Anchor	Other Key Retailers	Distance from Belcamp
Pavilions Shopping Centre, Swords	Town Centre	45,500	2,000	Dunnes Stores & SuperValu	Penneys, Zara, H & M, Next, River Island, Mango, Movies@ Swords	8.6 km
Clarehall S C	District Centre	13,754	850	Tesco		1.9 km
Donaghmede S C	District Centre	17,190	600	Dunnes Stores	Holland & Barrett, Tiger, Kays Kitchen	3.1 km
Northside Shopping Centre	District Centre	17,000	510	Dunnes Stores & SuperValu	New Look, JD Sports, Peter Mark, costa Coffee	5.5 Km
Northern Cross	Street		On street	Fresh		1.1 km
Clongriffin / Belmayne						3.7 km

The above demonstrates the significant volume of floorspace which already exists within the catchment of the site and is predominately comprised of convenience focused retailing, anchored by one of the majors, with The Pavilions Towncentre providing the significant comparison offering and representing the regionally dominant retail centre.

It is extremely important to look at the context of where retail has evolved. The Retail Planning Guidelines were last updated in 2012. Fast forward 10 years and there has been enormous change not only in how people shop but also how retailers are reaching their customers, a two year pandemic and a significant shift and focus towards a greener, more sustainable agenda are all combining to provide a much different picture to that of 2012.

There is a marked increase in the internet penetration in Ireland and in particular this has been much more profound in the comparison-based retailing sector than that of the convenience-based retailers in Ireland. The diagram below illustrates the percentage of turnover generated by online sale, it should be noted this reflects business' registered in Ireland only and does not account for those registered elsewhere.



The trends are being echoed throughout our industry as examples of steady consolidation by major fashion / comparison retailing brands across the entire country as they review, adapt and move towards a more omni-channel approach. Examples of this are retailers such as Next who have slowly reduced the number of stores in Ireland, the Arcadia Group (which included TopShop, TopMan, Dorothy Perkins, Evans and Burtons) who have now exited the market in its entirety, New Look which has reduce its store numbers due to ongoing financial difficulties and that is just the tip of the iceberg as they deal with the ever growing number of competitors in the virtual world such as Boohoo, Zalando, Very.co.uk, Asos & Pretty Little Thing, etc. So, it should be borne in mind that any comparison availability or additional spend from a commercial point of view is now seen to be moving to fill the gaps and voids in the larger regional town centre developments and in the context of Dublin these are the majors located around the M50 at all the major junctions.

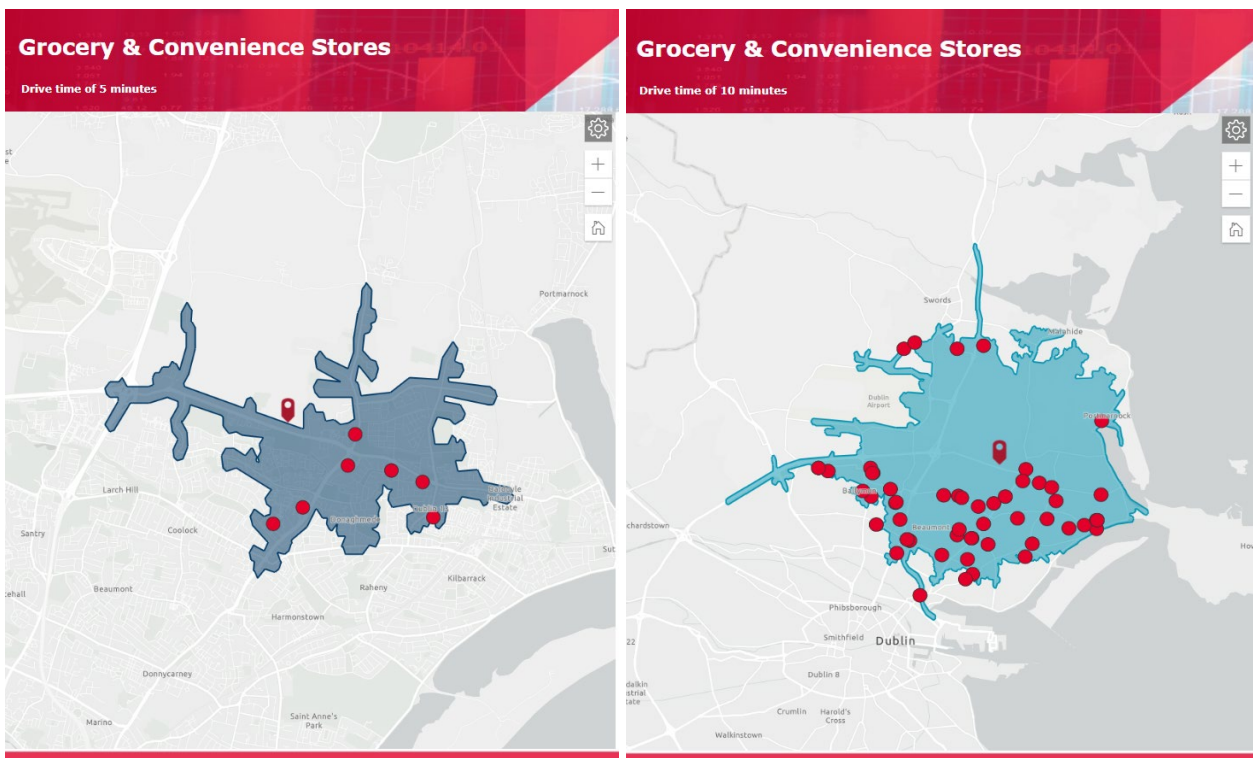
- The Pavilions, Swords,
- Blanchardstown Town Centre,
- Liffey Valley,
- The Square
- Dundrum Towncentre



The majority of brands have consolidated their position within these locations with larger but fewer stores. The next tier of centres below that, at a district level are struggling to find replacement tenants for those uses which are outside convenience use.

Conversely, over the course of the last number of years a steady growth and demand from the convenience and grocery sector of the market which has seen demand increase based on lesser travel distances and increased convenience for the customer. Also, the last two years under which we have had a series of lockdowns has seen a move back by many consumers towards more traditional smaller retailing akin to 'shopping local' again.

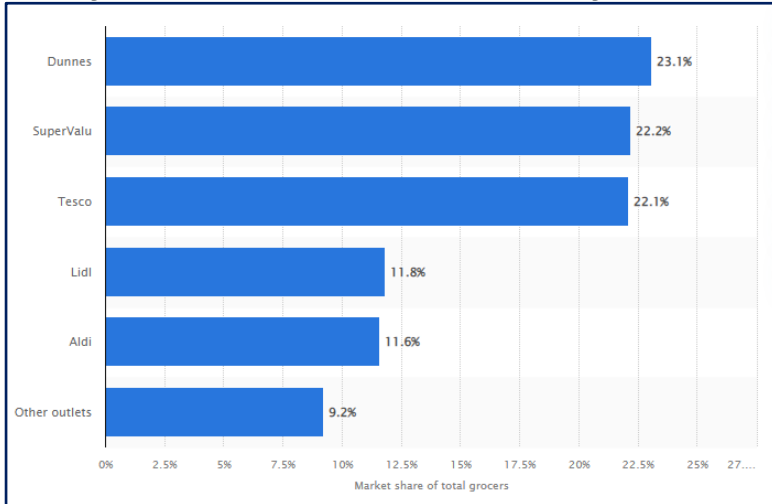
Our own analysis of the immediate area shows that within a five minute drivetime of the Belcamp site there are seven major grocery brands with both Northern Cross and Clarehall being within walking distance and if you move to a 10 minute drivetime this dramatically increases to more than 70 which is a mixture of both major and smaller convenience stores dotted around the location.



Source: Cushman & Wakefield / ArcGIS

The challenge to this level of market penetration is that the market is dominated by so few players:

### Grocery Market Share – 12 weeks to 23 January 2022



Source: Statista

The above clearly demonstrates the dominance of the “big 5” players in the Irish market. Leaving little alternatives with fewer independents able to compete against such strong brands.

### PROPOSED DEVELOPMENT

All of the above should then be considered in terms of the proposal for Belcamp and what would be required.

We are advised that the proposed development, is to provide for a total net area of 4,424 sqm, comprising a mixture of retail / commercial uses, together with bar and restaurant. These retail/commercial units are proposed across the scheme, located within different areas to activate, and encourage activity within the development.

#### FCC Development Area

- Block D: Café/Restaurant/7 no. Retail Units – 1,020.5 sqm (Ranging from 55 sqm to 132.5 sqm)
  - Block F: Café/Restaurant/5 no. Retail Units – 1,162 sqm (Ranging from 152 sqm to 208 sqm)
  - Block G: A Retail Unit – 140 sqm
  - Block J: 4 no. Retail Units – 472 sqm (Ranging from 91.3 sqm to 144.7 sqm)
  - Creche: Childcare – 606.7 sqm
  - Clubhouse: Changing rooms – 97 sqm
- Total – 3,498.2 sqm

#### DCC Development Area

- Block 3: Café/Retail – 417.8 sqm
  - Block 3: Creche – 508 sqm
- Total – 925.8 sqm

TOTAL: 4,424 sqm

Our understanding is that upon completion the expectation is that the proposed scheme would accommodate a maximum 8,232 to 9,513 people on the lands.

From a commercial point of view these residents could be amply catered for from a retail perspective at Clarehall which is anchored by a substantial Tesco food store of 10,000 sq.m or indeed the local developments at both Northern Cross where Fresh have a store. Further afield Dunnes Stores are in both the Pavilions, Swords and Donaghmede Shopping Centre with substantial stores. Many of these operators now utilize these larger format stores as hubs to provide home delivery services for weekly shops as part of their offer. So, from a large-scale shopping centre point of view we believe the area is extremely well served and there would be no rationale for the provision of any such covered mall experience in the Belcamp development.

Our suggested focus would be on more local shopping as defined in the Retail Planning Guidelines which would see a mixture of a limited number of neighbourhood style shops, comprising a smaller more convenient food, some non-service uses such as café, pharmacy, delicatessen, hair & beauty and some additional commercial.


From a Belcamp perspective is that any retail/commercial provision here should be considered in the context of what is likely to be required by those living within that development as the retail provision in the immediate area is already significant both from a convenience and a comparison basis. We do not envisage any comparison demand from higher order retailers and see the focus for this development would be around a small convenience store, provision of an F&B coffee shop/casual dining and some elements of ancillary uses such as a smaller pharmacy and possibly a hair and beauty.

It should be borne in mind that there is already a proliferation of such uses within easy reach of Belcamp and therefore an oversupply of floor area will lead to long term vacancy which is counterproductive to a sustainable environment. Other uses which can be considered within the provision which is suggested will be some health and wellbeing uses such as dry gyms or fitness studios, the provision of a bar/restaurant.

We have also seen much stronger demand for childcare facilities and after school facilities on a larger format rather than smaller “drop in” offers. The proposal here addresses this with the provision of two larger format creches, which are reflective of where the demand from the operators is coming for.

In conclusion, our view here would be that the provisions as set out in this application are in line with what would be required from a development such as this given the competitive nature of the surrounding retail which is in the immediate vicinity.

Yours Sincerely



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Karl Stewart  
Director & Head of Retail - Ireland