

# CLONBURRIS STRATEGIC DEVELOPMENT ZONE (SDZ) PLANNING SCHEME

## RETAIL STUDY – ADDENDUM REPORT

November 2019

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## 1 Introduction

### 1.1 Background

MacCabe Durney Barnes were commissioned by South Dublin County Council to prepare a Retail Study for Clonburris Strategic Development Zone (SDZ). The brief was as follows:

1. Review the current retail policy including that in the Retail Strategy for the Greater Dublin Area (RSGDA) 2008-2016, the South Dublin County Development Plan (CDP) 2016-2022, the current Clonburris SDZ Planning Scheme and the Balgaddy Local Area Plan.
2. Undertake a health check assessment of centres within the catchment.
3. Assess retail floorspace requirements, and more specifically
  - assess the vitality and viability of existing centres within the catchment
  - measure existing floor space (including update of 2008 GDA Retail Strategy)
  - assess the retail need, taking into account of revised planned population for Clonburris and growth in consumer spending
  - assess the additional retail floorspace requirements, having regard to turnover of existing retailers, sales density, etc.
4. Consider issues of phasing, sequential development and the emerging SDZ Planning Scheme
5. Make recommendations accordingly.

The findings of the study informed the provisions of the Draft Planning Scheme, which was put on public display in September 2017. The *Clonburris Strategic Development Zone (SDZ) Planning Scheme Retail Study September 2017* was also finalized. The Scheme was adopted, subject to variations and modifications, by the Council in June 2018. It was subsequently appealed to An Bord Pleanála (ABP Ref: ABP-301962-18). An Oral Hearing was held in January 2019 and final decision to confirm the Planning Scheme was adopted in May of 2019. The Board made modifications to the Scheme. They included increasing the target number of units from 8,437 to 9,416 and the maximum number of units from 9,192 to 11,098.

### 1.2 Purpose of Report

Given the changes in the made by An Bord Pleanála to the Scheme as approved by South Dublin County Council, particularly in relation to the increase in housing units, consideration needs to be given to whether:

- a) the overall quantum of planned retailing floorspace within the Scheme is adequate to cater for the additional resident population;
- b) the planned retailing floor space is appropriately distributed through area; and

c) the phasing provisions in the Planning Scheme are robust.

### **1.3 Structure of the Report**

The report is structured in the following manner:

- **Section One** is the introduction.
- **Section Two** of this report reviews the Clonburris SDZ Planning Scheme as approved by An Bord Pleanála in May 2019.
- **Section Three** provides an analysis of the approved Scheme.
- **Section Four** provides conclusions.

## **2 Review of Clonburris SDZ Planning Scheme**

### **2.1 Retail Study**

A review of the emerging Draft Planning Scheme was undertaken in Q4 2016. An assessment was undertaken of the likely capacity requirements in quantitative terms for the additional retailing floor space in Clonburris, having regard to the policy context and its designation as a Level 3 District Centre. Consideration was also given as to the appropriate stage at which such retailing should be delivered in order to support the Planning Scheme area as it develops, while also balancing the need to protect other centres within the catchment. A forecast year of 2035 was selected to allow for an appraisal of the retailing requirements. There was a general data cut-off date of the 18<sup>th</sup> October 2016

This provided a broad quantitative assessment of the required quantum of floor space required at various stages of the development. It was based upon certain assumptions in relation to catchment size, population and household growth, other planned centres, in addition to projections for expenditure per capita. Convenience, comparison and retail services needs were assessed.

The Study assessed three scenarios

- Target scenario of 8,437 residential units
- High growth scenario 9,192 residential units
- Low growth scenario of 7,682 residential units

In the target scenario, it was estimated that a total of c21,500 of gross retail floor area would be required, which would include convenience, comparison and retail services.

In the high growth scenario, it was deemed that additional convenience demand may support an additional store of between 700 and 1,000 sqm net sales area. In the low growth scenario, approximately 700 sqm less of net retail sales area would be required.

It was assumed that there would be no significant additional comparison retailing provided for over the baseline scenario, as any additional demand would be directed to Clondalkin Town Centre and Liffey Valley in accordance with relevant CDP policy.

The Study also recommended phasing to deliver retail development in line with the growing population.

### **2.2 Adopted Clonburris SDZ Planning Scheme (June 2018)**

The Draft Planning Scheme was placed on display in September 2017 and was Made, subject to material amendments and modifications, on the 19<sup>th</sup> June 2018. The target units were distributed throughout the development areas in accordance with the breakdown illustrated in Table 2.1.5 of the Planning Scheme. Table 2.5.1 details the maximum quantum of retailing in each area.

**Table 2.1.5** | Extent of Residential Development According to Development Area

Development Area	Total Dwelling Units (number)		
	Min	Target	Max
Adamstown Extension	396	442	488
Kishoge Urban Centre	680	734	789
Kishoge North West	510	566	621
Kishoge North East	666	738	809
Kishoge South West	951	1059	1167
Kishoge South East	615	678	740
Clonburris Urban Centre	1176	1265	1355
Clonburris North West	711	783	854
Clonburris North East	372	410	447
Clonburris South West	1311	1441	1571
Clonburris South East	184	201	217
Canal Extension	110	121	133
<b>Total</b>	<b>7,682</b>	<b>8,437</b>	<b>9,192</b>

**2.1.6 Maximum Non-Residential (Retail and Retail Services) According to Development Area**

Development Area	Retail & <del>Non</del> Retail Services (Gross sq.m)
Adamstown Extension	0
Kishoge Urban Centre	3,500
Kishoge North West	0
Kishoge North East	0
Kishoge South West	<del>300</del> 550
Kishoge South East	<del>400</del> 650
Clonburris Urban Centre	16,520
Clonburris North West	<del>400</del> 650
Clonburris North East	0
Clonburris South West	<del>400</del> 650
Clonburris South East	0
Canal Extension	0
<b>Total</b>	<del>21,520</del> <b>22,520</b>

The quantum of retailing was increased by MA 2.1 – No.4 with the addition of 1,000 sqm of gross floor area. The amendment resulted from a number of submissions requesting an increase in the maximum net floor area for the Local Nodes to make them more viable and the Chief Executive Report recommended a small increase in each of the 4 Local Nodes and that added to 1,000 sqm. Its distribution reflected the recommendations of the Retail Study. Phasing in relation to retailing is summarized below in Table 1.

**Table 1: Planning Scheme Phasing**

Phase	Residential Units Constructed & Occupied	Minimum Delivery in Phase
<b>1A</b>	0-1,000	Retail Core development in accordance with the Place Making Requirements.
<b>1B</b>	1,001-2,000	<ul style="list-style-type: none"> <li>• Planning permission for Clonburris Retail Core, including retail provision, employment, residential, community floorspace and urban hub.</li> <li>• Planning permission for Kishoge Retail Core, including retail provision, employment, community floorspace and residential.</li> <li>• Planning and commencement of works at Griffeen Valley Park Extension or Barony Park (North and South) in accordance with the prepared and agreed strategic Parks and Landscape Strategy.</li> <li>• Provision of a minimum 1,000 sqm net convenience floorspace and 500 sqm net comparison/ retail services floorspace (As part of the Place Making Requirements for delivery of Kishoge and Clonburris)</li> </ul>
<b>2</b>	2,001-4,000	• Retail Core development in accordance with the Place Making Requirements.
<b>3</b>	4,001- 6,000	• Retail Core development in accordance with the Place Making Requirements.
<b>4</b>	6,000- end	• Retail Core development in accordance with the Place Making Requirements.

Place making requirements for Clonburris and Kishoge retail cores are detailed in Section 4.4. Every 1,000 units constructed in the Clonburris catchment (Fig 4.1) requires the construction of a minimum of 25% of Clonburris Retail Core Area. In Kishoge, every 1,000 units constructed in the Kishoge catchment (Figure 4.1) requires the construction of a minimum of 33% of Kishoge Retail Core area

### 2.3 Appeal and An Bord Pleanála Decision (May 2019)

The Inspector's report on the appeals and oral hearing made certain recommendations. The following is a summary of the key recommendations in relation to retailing provision:

In relation to retailing provision, the following alterations were recommended:

5. Revise bullet point 1 in Phase 1B, Table 4.3 on page 134 to:

*"Planning permission for appropriate elements of Clonburris Retail Core, including retail provision..."*

**Reason:** In the interest of clarity

(This amendment indicated that only *appropriate elements* of the Clonburris Retail Core needed to be provided)

6. Revise bullet point 5 in Phase 1B, Table 4.3 on page 134 to:

*"Provision of a minimum 1,000 sqm net convenience floorspace and 500 sqm net comparison / retail services floorspace (as part of the Place Making Requirements for delivery of Kishoge)."*

**Reason:** In the interest of clarity

(Reference to Clonburris was dropped in this bullet point, as it was already covered in the bullet point no.1)

The following clarification was also recommended:

4. Note: Material Alteration Ref. Section 2.1 – No. 4 relates to Table 2.5.1 on page 44 of the Planning Scheme as well as Table 2.1.6 on page 19.

(This related to retail floor space).

The Board accepted these recommended amendments. However, its decision it revised up the target by c1,000 residential units from 8,437 to 9,416. These are broken down in Table 2.1.5 of the approved Planning Scheme.

**Table 2.1.5** | Extent of Residential Development According to Development Area

Development Area	Total Dwelling Units (number)		
	Min	Target	Max
Adamstown Extension	395	442	487
Kishoge Urban Centre	711	1,039	1,368
Kishoge North West	514	566	625
Kishoge North East	667	738	811
Kishoge South West	949	1,059	1164
Kishoge South East	610	678	735
Clonburris Urban Centre	1,194	1,938	2,686
Clonburris North West	713	783	856
Clonburris North East	372	410	447
Clonburris South West	1,311	1,441	1,569
Clonburris South East	184	201	217
Canal Extension	110	121	133
<b>Total</b>	<b>7,730</b>	<b>9,416</b>	<b>11,098</b>

**Table 2.1.6** | Maximum Non-Residential Development (Retail and Service Floorspace) According to Development Area

Development Area	Retail & Retail Services (Gross sq.m)
Adamstown Extension	0
Kishoge Urban Centre	3,500
Kishoge North West	0
Kishoge North East	0
Kishoge South West	550
Kishoge South East	650
Clonburris Urban Centre	16,520
Clonburris North West	650
Clonburris North East	0
Clonburris South West	650
Clonburris South East	0
Canal Extension	0
<b>Total</b>	<b>22,520</b>

There was no specific consideration given to any associated additional retailing requirements in the Direction or the Order issued by the Board. As the Inspector had not recommended the increase in quantum, he had not provided any analysis of the any associated requirements.

### **3 Assessment of Retailing Need Resulting from Approved Planning Scheme**

#### **3.1 Methodology and Assumptions**

The Board made its decision on approving the Planning Scheme based upon the information presented at the oral hearing, which consisted of the Made Planning Scheme (the Draft Planning Scheme September 2017, as altered by material alterations and amendments March 2018) and all associated supporting documentation, including the Retail Study of September 2017. While it is acknowledged that baseline information on which the recommendations of the Retail Study are based (i.e. price year, permitted development) have changed, it is considered inappropriate to alter the fundamental assessment, as this would be to introduce alterations on which the Council and An Bord Pleanála based their original decisions. The methodology adopted is therefore to assess the capacity requirements resulting from the additional residential units permitted by the Board.

In relation to the quantitative assessment, the following step-by-step methodology is adopted (with indications of where assumptions are altered from the original assessments as a result of the Board's decision):

- Identification of catchment or study area. (unaltered assumption)
- Estimate the population at the base year and forecast year. (base year unaltered, forecast year altered)
- Estimation of expenditure available within the defined catchment or study area at the base and forecast years. This involves projecting inflows and outflows or expenditure derived principally from the RSGDA 2008-2016. (base year unaltered, forecast year altered)
- Estimation of the turnover of existing centres and permitted development within the catchment area which are likely to be affected by new retail development at Clonburris. In this regard other existing and proposed designated local centres are taken into account.
- Estimation of the likely turnover of the new retail development within the Planning Scheme area.
- Estimation of the capacity for additional floor space within the catchment.

All figures within the assessment been rounded off to the nearest point of decimal. The price year throughout the assessment is 2013. Relevant 2016 census population information is used to inform the baseline. A forecast year of 2035 has been selected to allow for an appraisal of the retailing requirements. There is general data cut-off date of the 18<sup>th</sup> October 2016.

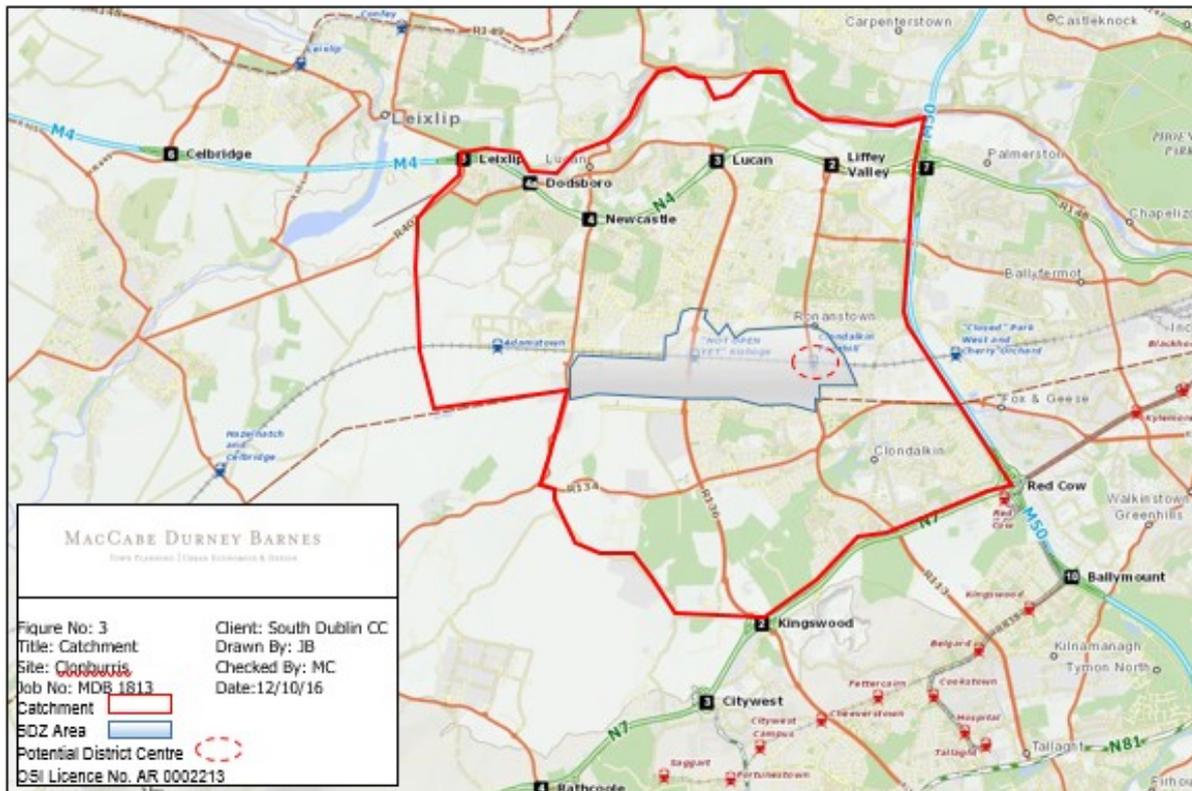
#### **3.2 Baseline Information**

##### ***3.2.1 Identification of Catchment Area***

This has involved the identification of appropriate drive time isochrone having regard to the proximity of centres within the catchment and those outside. It has also had regard to the

physical barriers associated with the area (e.g. the Liffey, M50 and N7). It is taken that the potential district centre is located at the Fonthill Road end of the Planning Scheme area. This remains unaltered from the original assessment.

**Figure 1: Catchment of Study Area**



### 3.2.2 Estimate of Population

An estimate of current and projected population within the study area is required. The 2016 current baseline population is taken from the 2016 Census. A policy induced growth rate is applied to the study area and based on the assumptions contained in the CDP core strategy and in particular the RPG targets which only go to 2022. The forecast year is therefore 2035. The assessment assumes that:

- Zoned lands in Lucan (including Adamstown) is built out by 2022 with the increase in population as per Table 1.10 of the CDP.
- The Core Strategy of the CDP forecasts 8,000 residential units in Clonburris by 2025. The Made Planning Scheme provided a target of 8,437. The Board's decision increased this to **9,416**. The minimum provision of 7,730 residential units, and the maximum of 11,098 units are used in the sensitivity tests, the results of which are summarised below in section 3.3.3.

- An average household size of 2.5 and a vacancy rate of 6.5% is applied in line with assumptions detailed in section 4.3 of the CDP Housing Strategy.
- The population of Clondalkin (including Clonburris) increases by 14,994 between 2016 and 2022 as per Table 1.10 of the CDP.

**Table 2: Existing and Projected Population**

	2011 Census	2016 Census	2021 CSO M2F2	2026 CSO M2F2	2031 CSO M2F2	2035	% change 2016-2035
<b>South Dublin</b>							
<b>County Council</b>	265,205	278,749	291,521	302,158	318,846	330,480	19%
<b>Study Area Total</b>	90,166	95,008	108,292	113,795	119,297	124,800	31%

Source: RPGs and CSO Census

The Board's decision increased the population from the Made Planning Scheme from 122,511 to 124,800 in 2035. This is a change from a 29% increase in population during the 2016 to 2035 to a 31% increase.

### 3.2.3 Estimate of Expenditure within Catchment and Retained Market Share

The estimated expenditure levels for convenience and comparison retailing need to be established. This is based upon the same price year as that in the original study. Expenditure per capita assumptions remain the same as for the original study.

**Table 3: Existing and Projected Expenditure per Capita (2013 Prices)**

Year	Convenience expend per capita	Comparison expenditure per capita
<b>2016</b>	€3,561	€3,264
<b>2035</b>	€5,990	€5,723

Source: MacCabe Durney Barnes

By multiplying the projected per capita expenditure on convenience goods for the projected population for the catchment area in the current and projected future year, figures for resident expenditure can be established for the catchment. These have to be adjusted to reflect additional inflow and outflow expenditure to reflect market share and retained expenditure. Inflow and outflow assumption remain unaltered, but the increase in population results in an increase in available expenditure.

**Table 4: Available Convenience and Comparison Expenditure (2013 Prices)**

	Convenience				Comparison			
	Resident	Inflows	Outflows	Total	Resident	Inflows	Outflows	Total
<b>2016</b>	€313.6m	€31.3m	€28.2m	€316.7m	€265.4m	€355.6m	€79.6m	€541.4m
<b>2035</b>	€631.9m	€63.2m	€56.9m	€638.2m	€557.4m	€746.9m	€167.2m	€1,137.1m

Source: MacCabe Durney Barnes

This has resulted in an increase of €6.5m in available convenience expenditure and €11.4m in comparison expenditure when compared with the original study based on the lower target number of housing units.

### 3.2.4 Estimate of Turnover of Existing Centres

This step involves an estimation of existing and committed retail floorspace within the study area. This remains the same as previously calculated.

**Table 5: Existing and Committed Floor Areas (sqm net sales area) in the Study Area**

Centre	Convenience				Comparison (including bulky goods)				
	2007 Floor Area	Compl 2007-2016	Commit	Total Existing & Committed	2007 Floor Area	Compl. 2007-2016	Commit	Total Existing & Commit	
Adamstown	0	0	3400	3,400	0	0	9,291	9,291	
Mill Centre Clondalkin	2,512	0	0	2,512	4,306	0	0	4,306	
Clondalkin Village	2,711	0	0	2,711	3,755	0	0	3,755	
Liffey Valley Rt Pk	0	0	0	0	18,278	0	0	18,278	
Liffey Valley SC	1,564	0	4,392**	5,956	27,493	0	27,318**	54,811	
Lucan*	7,622	0	0	7,622	4,457	0	0	4,457	
Lucan Rt Pk	0	0	0	0	4,821	0	0	4,821	
Neilstown	249	0	0	249	92	0	0	92	
Ronanstown/Fonthill	877	893	0	1,770	10,771	8,853	0	19,624	
Rowlagh Village	498	0	0	498	422	0	0	422	
<b>TOTAL</b>	<b>16,033</b>	<b>893</b>	<b>7,792</b>	<b>24,718</b>	<b>74,395</b>	<b>8,853</b>	<b>36,609</b>	<b>119,857</b>	

Source: RSGDA 2008-2016, Planning Register

\* Includes Lucan Village, Lucan Shopping Centre, Hillcrest Lucan and Ballyowen Castle Shopping Centre

\*\* Includes 20,942 sqm of comparison and 892 sqm of convenience permitted by the Council under P.A Reg. Ref: P.A Reg. Ref:SD16A/0027)

Assumptions in relation to average sales density per sqm are required for the convenience retailing. Appendix 1 of the RSGDA assumes a convenience sales density of €12,551 per sqm in 2016. Applying the growth rate in turnover per sqm resulting from improved efficiencies results in a sales density of €13,868 in the forecast year of 2035. The RSGDA assumes a combined bulky and non-bulky comparison sales density of €7,000 per sqm in 2016. Applying the assumed RSGDA growth factors would result in a comparison sales density of €7,734 in the forecast year of 2035.

The turnover of existing and committed convenience floor space is €310.2m in 2016 and €342.7m in 2035. Furthermore, the turnover of existing and committed comparison floor space in the catchment is €83m in 2016, rising to €927m in 2035.

### **3.3 Analysis of Retail Need and Requirements**

#### **3.3.1 Convenience Retailing**

As highlighted above, it is estimated that there would be an available convenience retail expenditure in 2016 of €316.7m and a projected turnover in the catchment area of €310.2m for the existing and committed development, leaving a headroom of €6.5m.

Under the Board's target housing scenario, the available expenditure rises to €638.2m in 2035 requiring 21,303sqm of net sales area. This is an increase of 463 sqm of net sales area over the original assessment. This is the equivalent of a large Spar or similar top-up convenience outlet.

#### **3.3.2 Comparison Retailing**

There would be an available convenience retail expenditure in 2016 of €541.4m and a turnover in the catchment area of €582.7m for the existing development only, resulting in a slight negative headroom of €41.3m. This suggests an under-trading of comparison retailing in the catchment.

The turnover of the existing and committed floorspace is €927m in 2035. Under the Board's housing target scenario, the available expenditure will rise to €1,137m in 2035, with a requirement for 27,170 sqm of net sales area. There is however, 36,606sqm of committed but unconstructed floorspace in Liffey Valley, but this will serve a wider catchment.

#### **3.3.3 Sensitivity Tests**

Sensitivity tests were undertaken in relation to convenience retailing, which is the more locally generated requirement, based on the minimum 7,730 units and maximum 11,098 specified by in the Board's decision.

In the high growth scenario it is deemed that additional convenience demand may support an additional store of c800sqm net sales area. In the low growth scenario, approximately c800 sqm less of net retail sales area would be required.

It is assumed that there would be no significant additional comparison retailing provided for over the baseline scenario, as any additional demand would be directed to Clondalkin Town Centre and Liffey Valley in accordance with relevant CDP policy.

## 4 Conclusions

Material Amendment (MA) 2.1 – No.4 added 1,000 sqm of retail floor space to the Planning Scheme before the Board made its decision. The additional retail quantum required to meet the Board’s increased target number of units is already therefore actually already catered for by MA2.1 – No.4. The approved Planning Scheme therefore has the appropriate quantum of retail floor space to meet the needs of the resident population in the target unit scenario. If the maximum number of units is likely to be reached, then a higher quantum of retail is likely to be required. Similarly, if a lower number of units is achieved, then a lesser quantum of retailing floorspace would be required. This could be assessed as part of the review of the Planning Scheme.

The retail provision is appropriately distributed throughout the Planning Scheme and this is not altered by the Board’s decision.

The phasing assumptions in the Planning Scheme remain robust, but can in any event be reviewed if the Planning Scheme is revised having regard to the number of units which are delivered.