

# Mason Owen & Lyons

Commercial Property Consultants

**Report on the impact of the proposed  
development of:**

## **Omni Plaza SHD**

**on the existing retail and services  
provision at**

## **Omni Park Shopping and District Centre**

**Santry, Dublin 9**

23<sup>rd</sup> August 2022

An Bord Pleanala  
64 Marlborough Street  
Dublin 1  
D01 V902

**Case Reference:** ABP-312202-21  
**Re:** Omni Plaza SHD,  
Omni Park, Santry, Dublin 9

Dear sirs

This report is in response to Pre-Application Consultation Opinion of An Bord Pleanala in respect of the aforementioned proposed development at Omni Park Shopping Centre and adjacent lands, Santry, Dublin 9.

Item 2 of this Pre-Application Consultation Opinion requests the provision of the following analysis to accompany the Strategic Housing Development Application:

2. A report that specifically addresses the impact of the proposed development on the services and retail product within the existing Omniplex park. The report shall address the quantum of retail/ commercial and residential proposed and the consideration of the Z4, mixed use zoning.

In response to this request, we have been instructed by the applicant to respond to the above. In addressing the point above we have approached this on the followings basis:

1. The Author
2. History / establishment of Omni Park Shopping and District Centre
3. Evolution of Omni Park Shopping and District Centre  
(Retail Market, Occupancy and uses)
4. The proposed development – Omni Plaza SHD
5. Potential Impact of proposed development
6. Quantum of retail/ commercial and residential proposed and the consideration of the Z4, mixed use zoning

## **1. The Author**

Mason Owen & Lyons was founded by its Chairman Edward Lyons FRICS FSCSI in 1977 and is a well-established commercial property consultancy with a reputation for providing comprehensive professional advice to our clients on all aspects of commercial property.

Mason Owen & Lyons is one of the top commercial property practices in Ireland providing a full range of services throughout the Investment, Retail, Industrial, Office and Development sectors. Our office of highly trained professionals exemplifies excellence in the property industry. With more than 100 years of combined experience our surveyors have been involved in every aspect of Industrial,

Retail & Office Agency, Corporate Services, Consulting Services, Investment Sales & Acquisitions, Development and Property Management.

Omni Park Shopping Centre was constructed by our client between 1989 and 1991 and Mason Owen & Lyons have been managing and letting agent for the development since its construction. Our management role includes the day to day management of all retail and service common areas, including the carpark and the overall Omni Park estate. In addition, our role as letting agent involves the marketing of the centre to new / potential occupiers and the primary objective of this role is to ensure that the occupancy and vibrancy of the centre is maintained so as to achieve a functional and coherent District Centre. In order to achieve this aim, our role is to ensure that both the occupancy of the centre is maintained while ensuring that the tenant mix is diversified and complementary to all occupiers and offers a full range of services to the centres customers.

Mason Owen & Lyons have been actively engaged with all tenants and the owners of the centre on a daily basis over the past 30 years and Mason Owen & Lyons are therefore best placed to comment on the impact of the proposed development on the existing retail and services of the centre.

## **2. History / Establishment of Omni Park Shopping and District Centre**

Omni Park Shopping Centre was opened in October 1991 by the applicant and associated entities / partners. The centre has remained in the same ownership/control for the period of its operation and has been a successfully operating district centre for the past 30 years - forming what is the primary commercial hub of the wider Santry area.

The catchment of Omni Shopping centre extends to Artane to the East, Drumcondra / Whitehall to the south, Ballymun to the west and Dublin Airport / south Swords to the north.

Following its opening in 1991 the centre comprised some 18,580sqm / 200,000 sqft of primarily retail accommodation with Tesco and Penneys forming the primary anchor tenants for the centre.

The primary original tenant mix of the centre was very much based upon convenience retail supermarket and fashion uses, all based off of a large surface carpark – such was the traditional shopping centre model of the era. The centre did benefit however from ancillary uses to include, bank branch, post office, petrol station etc – however the level of entrainment, social and medical services offered, or office accommodation was nominal.

Latterly the IMC Cinema opened in circa 1996, attracting a greater diversity of uses and users to the centre as well as initiating a greater level of activity in the centre throughout the day and into the evening.

The opening of an externally facing retail warehouse style development in the late 1990's (originally occupied by Homebase) further added to the diversity of the centre over the period to the mid 2000's.

### **3. Evolution of Omni Park Shopping and District Centre**

In 2005-2006 a major facelift, renovation and extension of Omni Shopping Centre was undertaken by the owner. These works involved the construction of a 2 storey mall of approximately 6,500sqm / 70,000 sqft net retail floor area, 2,500sqm / 27,000sq.ft. of office space and the development of a new multistorey carpark of circa. 675 spaces.

The rationale behind this redevelopment was to expand the retail offering in the centre which was beginning to lack the diversity of competing centres in the Greater Dublin Area (GDA). In order to maintain its position as the primary commercial centre of choice for its catchment population the centre needed a greater offering to encourage footfall and attract new retailers and brands to the locality.

This was successful only in part. Following the opening of the major extension in 2007 it was clear that the retail occupier market for such suburban locations was starting to wain and that the retail sector globally was struggling to cope with the onset of mass transfer of sales to online platforms. The ability to purchase online was having a direct impact upon the footfall and subsequently the sales volumes of retail centres not only in Ireland, but globally.

As a result, the newly constructed mall was increasingly difficult to fill and over a period of 10+ years the resultant occupancy was only approximately 60% of the space being occupied (primarily at ground floor level only) – leaving a substantial mall at first floor unoccupied for the best part of 12 years.

Against the backdrop of such structural change in the international retail market, a definite strategy of diversification of uses was implemented by the owners and Mason Owen & Lyons as letting agents. The objective of this diversification was to attract more service type uses to the centre to help sustain footfall and support traditional retail tenants.

Destination services targeted included:

- Leisure uses for which patrons would travel to Omni to utilise
- Services uses which non-retail customers would attend the centre
- Medical uses
- Office uses which would create employment and add to the permanently sited population within the site per day
- Additional supermarket offerings

The above strategy has, over a decade resulted in attracting the following (non-exhaustive list) of service and leisure uses to Omni Park:

- Drivers Licence registration centre (NDLS)
- Driving Test Theory Centre
- Post office
- Beaumont Hospital Out-Patients Consultancy Suites
- Lidl and Marks and Spencer supermarkets
- Boots (incl. dispensing) pharmacy

- Nandos/Eddie Rockets/Camile Restaurants
- Gym
- Multiple office users

In all the tenant mix may be summarise as below:

Tenant Profile	Sq Ft	Sq M	% of S.C
Animal Care	6,697	622	1.63%
Beauty Salon	1,893	176	0.46%
Books/Stationary/ Gifts	7,717	717	1.88%
Service providers	18892	1,755	4.59%
Electronics	23588	2,191	5.74%
F&B	28457	2,644	6.92%
Fashion	78674	7,309	19.13%
Hardware	1,484	138	0.36%
Homeware	22972	2,134	5.59%
Jewellery	755	70	0.18%
Mechanics	3459	321	0.84%
Medical	15421	1,433	3.75%
Other	11900	1,106	2.89%
Pharmacy	20453	1,900	4.97%
Sport	8934	830	2.17%
Supermarket	85996	7,989	20.91%
Travel	1841	171	0.45%
Vacant	25179	2,339	6.12%
Entertainment	46,934	4,360	11.41%
<b>Total</b>	<b>411,246</b>	<b>38,206</b>	<b>100.00%</b>

\* Please note that the tenant mix as illustrated above may vary on a weekly basis dependant upon letting activity and is correct as at the date of writing given the currently available commercial letting information for the centre. Floor areas quoted are commercially lettable space and may not directly correlate with gross or net architectural area stated elsewhere.

Although the above analysis is completed on a % of floor area basis, it should be noted that many of the service or ancillary offerings are uses requiring minimal space and that the benefit and diversity of uses is not necessarily reflected in such a floor area breakdown.

#### **4. The Proposed Development – Omni Plaza SHD**

We understand that the proposed development comprises a residential development of 457 no. apartments which will be primarily serviced through Omni Park Shopping Centre spine Road and that the development will include a basement carpark of 213 no parking spaces and a new public plaza facing onto the existing surface carpark to the northwest of Omni Park .

The proposal also provides for the loss of 104 no. car parking spaces associated with Omni Shopping centre and has a total commercial / non-residential provision as follows:

		<u>Sq.M.</u>
CRECHE (sqm)	Block C	225.7
COMMUNITY SPACE (sqm)	Block D	195.3
COMMERCIAL/ RETAIL AREAS (sqm)	Block C	210.1
	Block D	220.8
<hr/> TOTAL		852.0

## 5. Potential Impact of proposed development

Mason Owen & Lyons have been asked to assess “the impact of the proposed development on the services and retail product within the existing Omniplex park”, and we do so below on an individual and cumulative basis.

### a) Creche

The provision of such a facility as part of the proposed development is welcomed and is seen to serve the proposed development and the wider community as a whole. This addition to the wider Omni Park district centre is seen as a net benefit and contributor to the overall mix of uses within the centre which does not currently benefit from such a use.

Impact: The impact is assessed as “positive”

### b) Community Space

The provision of a community space within the proposed scheme is to be welcomed as an additional resource for the local community and may be seen as one which reinforces Omni Park as the evolving heart of the Santy area’s service provision.

Impact: The impact is assessed as “positive”

### c) Retail/ Café/ restaurant:

The 2 no. proposed retail café / restaurant uses which are to be provided as part of the proposed development comprise a total of 431sq.m. and will form much of the active ground floor frontage of the proposed development as it pertains to the wider district centre. As such the inclusion of such provision at this location is welcomed. It is essential for the successful integration any retail / commercial uses into an existing retail context that the idea of an “active” façade is maintained at ground floor level. This is the case with the proposed development and its design in activating the proposed public plaza will ensure that the currently missing link as between the existing leisure and cinema uses to the west and the existing retail (Lidl/M&S/Mazi-Zoo) uses to the northeast is created and maintained as an active thoroughfare, both day and night.

In terms of scale, the commercial spaces proposed comprises a modest addition to the overall quantum of commercial space in the centre. That said the location and fact that the uses utilise much of the active ground floor element of the proposed scheme is important and welcomed in the context of the agglomeration of uses to the northwest quadrant of the overall district centre:

Impact: The impact is assessed as “positive”

### d) Reduction of 104 no. parking spaces associated with Omni Park District Centre

The proposed reconfiguration of the existing carpark to the northwest corner of Omni Park District Centre for the provision of a new public plaza is an intervention to the prevailing use of the existing carpark in this location. We can confirm that, being located at the extremity of the site from the primary entrance to the shopping centre that the location in question is the least used of all parking areas with the centre. In addition, we can confirm that the current provision of in excess of 1400 parking spaces at Omni District Centre is in excess of the centre’s current requirements. At present much of the area in question is unoccupied on



a daily basis and the centre's multi storey carpark remains at 60% occupancy at a maximum. In this context the reduction of 104 no. parking spaces to allow for the enhancement of the overall district centre is not considered significant nor likely to cause any observable change in parking provision to existing users.

Impact: The impact is assessed as "neutral"

e) 457 no. apartments

The residential element of the proposed development is likely to create a significant additional population base to the catchment of the existing district centre. In conjunction with the permitted Omni Living development (324 no. residential units) it is envisaged that the impact of the arrival of a permanently residing population to the centre will mark a transformative point in the evolution of the district centre which hitherto has not fulfilled its designated function of a providing a true mix of uses. We outline in the following section of the report how the inclusion of residential as a significant use within the district centre will serve to rebalance the currently uneven distribution of uses where retail and commercial are the primary lands use represented. The mix of residential and commercial uses in a district centre setting such as this will serve to create real synergies whereby the retail base of the centre shall benefit from serving a growing local population while the new population will be in the unique position of having all uses on their doorstep.

Impact: The impact is assessed as "positive"

f) New Public Plaza

The proposed new public plaza and improvements to the public realm are seen as very beneficial to the existing centre and the overall customer experience. It will allow for enhanced retail / community offerings at various times during the day and at various times of year; i.e., Christmas markets / farmers markets etc may be provided for.

In addition, the provision of such an attractive outdoor, south facing space will encourage and attract customers, employees, and residents of the district centre to utilise the space as a hub for meeting friends, having lunch / coffee etc. This approach has been very successfully achieved in other Dublin shopping centres such as Dundrum Shopping Centre.

Impact: The impact is assessed as "positive"

g) Cumulative impact

Having had regard to the above-mentioned impacts, it is the considered opinion of Mason Owen & Lyons that the overall impact of the proposed development on the existing retail and services provision at Omni Park district centre will be significant. The increased footfall and encouragement of additional dwell time in the overall district centre due to its diversified mix of uses and linked trips will serve to sustain existing and promote new retail and service offerings within the centre.

Impact: The impact is assessed as "positive"

**6. Quantum of Retail/ Commercial and Residential Proposed and the Consideration of the Z4, Mixed Use Zoning:**

Having regard to the quantum of retail, commercial and residential proposed as part of the proposed development, Mason Owen & Lyons, in conjunction with the applicant's design team have completed an overview (below) of the current existing mix of uses within the overall district centre and how that this mix would be varied over time and upon completion of the currently permitted development (Omni Living) and the now proposed development (Omni Plaza SHD).

	Current District Centre		Current and permitted (inc Omni Living)		Current, permitted and proposed (inc Omni Living and proposed development)	
<b>Commercial</b>						
Retail	23,626		23,220		23,220	
Entertainment, F&B, Leisure	7,004		7,190		7,621	
Community & Medical	5,237		5,495		6,127	
Vacant	2,339		2,339		2,339	
Aparthotel	-		4,020		4,020	
<b>Total</b>	<b>38,206</b>		<b>42,264</b>		<b>43,327</b>	
<b>Industrial</b>						
Industrial (Omni Plaza)	6,377		6,377		-	
Industrial (Omni Living)	1,184		-		-	
	<b>7,561</b>		<b>6,377</b>		<b>-</b>	
<b>Residential</b>						
Residential (units)	-		324		781	
Residential (net apt areas)	-		21,492		52,615	(approx)
<b>District Centre Total (excl. adjacent Z4 lands)</b>	<b>45,767</b>		<b>70,134</b>		<b>95,942</b>	
<b>District Centre Mix</b>	<b>Current District Centre</b>		<b>Current and permitted</b>		<b>Current, permitted and proposed</b>	
Commercial	38,206	83%	42,264	60%	43,327	45%
Industrial	7,561	17%	6,377	9%		0%
Residential	-	0%	21,492	31%	52,615	55%
		100%		100%		100%

\*\* note that the figures quoted above related to lettable space to which Mason Owen & Lyons have current data and are within our client's control. We note report by John Fleming Architects which includes for a zoning area analysis, including lands outside of our clients' ownership and includes AIB site to the north and Petrol Filling Station to the south. It should be noted that any variation in floor area with any other accompanying report in this application may relate to variation in gross and net lettable floorspace and other commercial varying factors. It is assumed above that all newly consented retail floorspace in Omni Living / Omni Plaza SHD is likely to be let for F&B uses.

The above analysis clearly illustrates a rebalancing of the uses in the centre to more closely align with the Z4 zoning objective. However, we would stress that the percentage quantum of development noted above is not wholly reflective of this rebalance of uses. The current split of land

uses (as defined in JFA zoning document submission) clearly states that the existing Z4 zoned area is in exclusively commercial / industrial use (77% commercial and 23% industrial). The combined addition of permitted and proposed development would redress this imbalance and provide for a lands use split of approximately 77% commercial and 23% residential. We feel that this assessment of the new balance of uses within the district centre on a land area basis more accurately reflects the real-world impact of the proposals. As retail is a primarily ground floor based activity, it is considered that any analysis of land use by the use of floor areas alone, would unduly skew the analysis – particularly where high density development with residential upper floors are the subject of such analysis. We would conclude therefore that the rebalance of uses to align with and actively promote the objectives of the Z4 zoning is appropriate in this instance – particularly having regard to the modest 23% of lands proposed for the new uses.

We can confirm that the existing centre has excess capacity – and this fact is borne out in the vacancy figure noted above. As such it is our opinion that the existing retail offering within the centre has the ability to absorb a significant increase in trading volumes into the future without any additional requirement for newly developed floorspace. This is a function of some retail businesses not requiring additional space in order to trade at higher volumes. Therefore, the proposed development does not detract from the ability of the existing centre to provide for the existing and any future increase in retail demand. Furthermore, were any such demand for additional space required, this may easily be accommodated within (see vacancy figure above), adjacent to or above the existing retail centre. The subject development does not therefore prejudice in any manner the ability of the centre to expand to meet any future requirements.

Our assessment and conclusion from the above analysis is that the proposed development in conjunction with the already permitted development within the District Centre lands will serve to directly support and encourage the retention and future growth of the existing retail and service offerings within the district centre at a time when demand for retail floorspace has been in continual decline for 15-20 years. This loss of demand for floorspace is a consequence of the onset of online retailing in conjunction with the general decline of the historic shopping centre model whereby car-borne destination retail was the predominant attraction. District centres such as that at Omni Park are required to be substantially repositioned to become truly mixed-use destinations which provide the residential, employment, retail, leisure, and services provision for the population of their catchment.

District Centres such as Omni Park provide an opportunity to maximise the current underutilisation of low-density lands which are located in key urban centres and in proximity to high frequency public transport corridors. These locations are unique in that they already provide all such services as would normally be aspirational in any newly proposed mixed use development. As such it is our opinion that to reinforce the existing uses within the district centre that a mix of residential and commercial uses such as that outlined in our analysis above represents a rare opportunity to truly deliver those objectives as envisaged by the Z4 zoning objective of the lands.

We envisage the proposed development, on completion will be a prime example of an operational 15 minute city model whereby residents could actively, live work, shop, socialise and avail of leisure pursuits all within one district centre landholding without the use of a car. This, in our opinion would appear to go to the core of delivery of sustainable development and be in accordance with all national, regional, and local policy objectives.

Yours sincerely,

**MASON OWEN & LYONS**

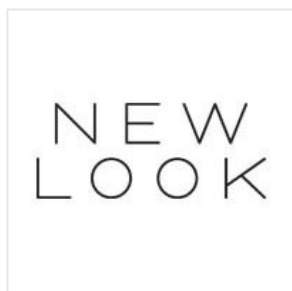


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## **Appendix 1**

Example Occupiers

Retail:



Entertainment and Food:



## **Appendix 2**

### **Photography**





Aerial view of existing district centre (looking south) – dominated by surface car parking



Entrance and Façade to Swords Road



Two storey mall



Marks and Spencer





Lidl (adjacent proposed development)



Modern retail façade to activate surface carpark



Active frontage