

Retail Impact Statement

In respect of

Proposed Residential and Mixed Use Development at Emmet Road

Prepared by

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On behalf of

Dublin City Council



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1.0 INTRODUCTION

This Retail Impact Statement (RIS) has been prepared by John Spain Associates on behalf of Dublin City Council in support of a proposed Part 10 mixed-use development at Emmet Road, Inchicore, Dublin 8. This report accompanies an application for approval to An Bord Pleanála made under Section 175 of the Planning & Development Act 2000 (as amended) for a residential development of 578 apartments supplemented and supported by community, retail/retail related services including a supermarket and public realm fronting Emmet Road along with open space and play facilities.

This RIS will provide an analysis of the relevant retail planning policy and a detailed qualitative and quantitative assessment of the capacity for the quantum of retail floorspace proposed.

This RIS report will comprise of the following sections:

- Section 2 sets out the site context
- Section 3 provides a description of the retail/retail related services and commercial elements of the development.
- Section 4 provides detail on retail planning policy
- Section 5 provides a qualitative assessment
- Section 6 sets out the quantitative assessment
- Section 7 demonstrates compliance with Paragraph 4.9 of the Retail Planning Guidelines 2012
- Section 8 concludes this RIS.

This RIS assesses the proposed supermarket (neighbourhood anchor store) which comprises c. 2,476 sq. m GFA (c. 1,765 sq. m net) in the context of the relevant provisions of the Retail Planning Guidelines 2012, the Dublin City Development Plan 2016-2022 as well as the Draft Dublin City Development Plan 2022-2028.

2.0 SITE CONTEXT AND DESCRIPTION OF THE PROPOSED DEVELOPMENT

2.1 SITE LOCATION

The subject lands are in ownership of Dublin City Council and are located c.4km west of the city centre within Inchicore in Dublin 8. The lands are bounded to the north by Emmet Road, to the south by Goldenbridge cemetery to the east by Patriot's Path/the former Richmond Barracks/Saint Michael's Church and to the west by Saint Vincent Street West.

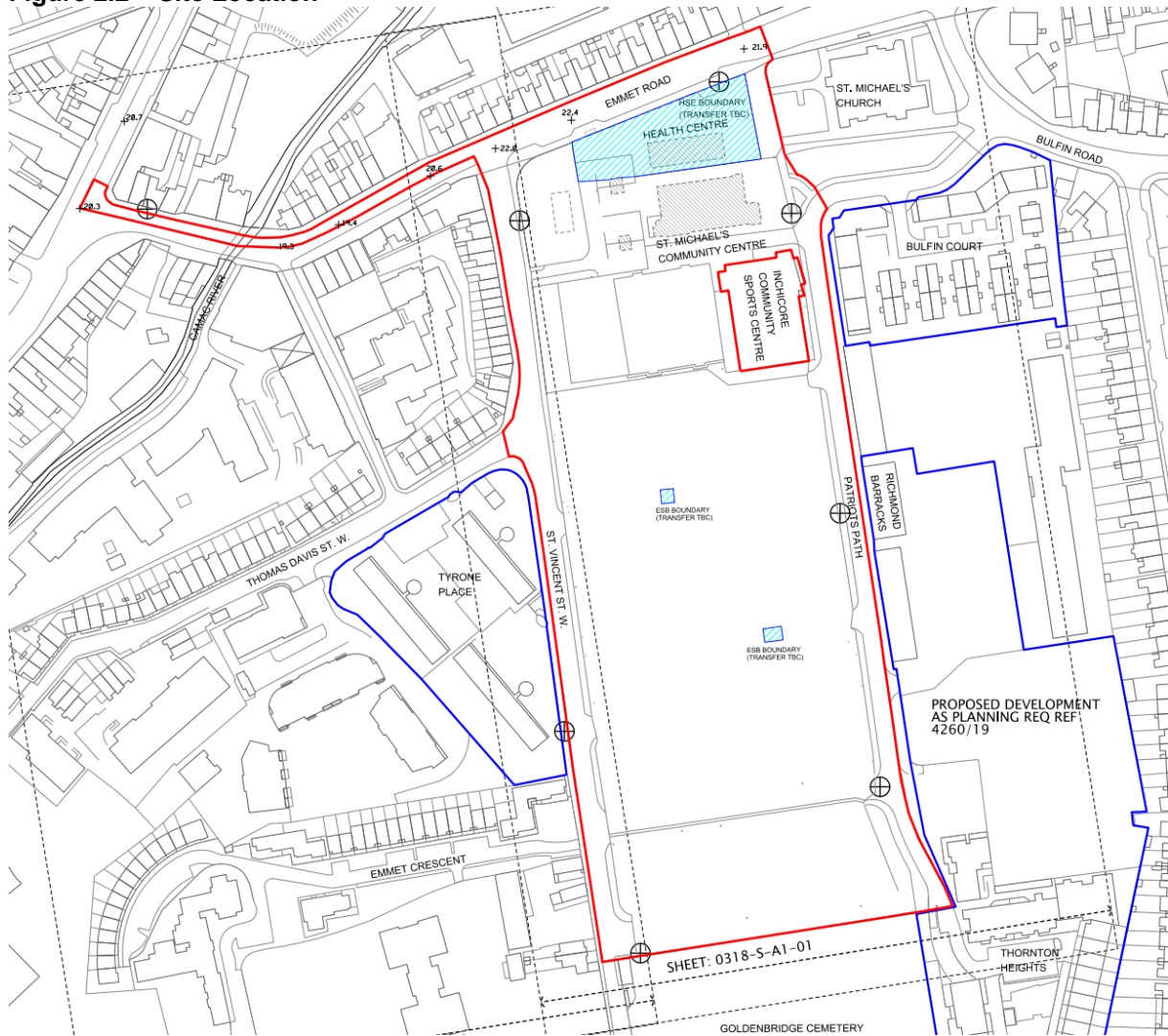
The application site amounts to an overall site of c. 4.68 hectares, a large portion of which comprises the lands of the (now demolished) Saint Michael's Estate housing development (c. 3.72 hectares) as well as Irish Water upgrade works along Emmet Road.

Figure 2.1 – Site Location Context



Source: Google Maps

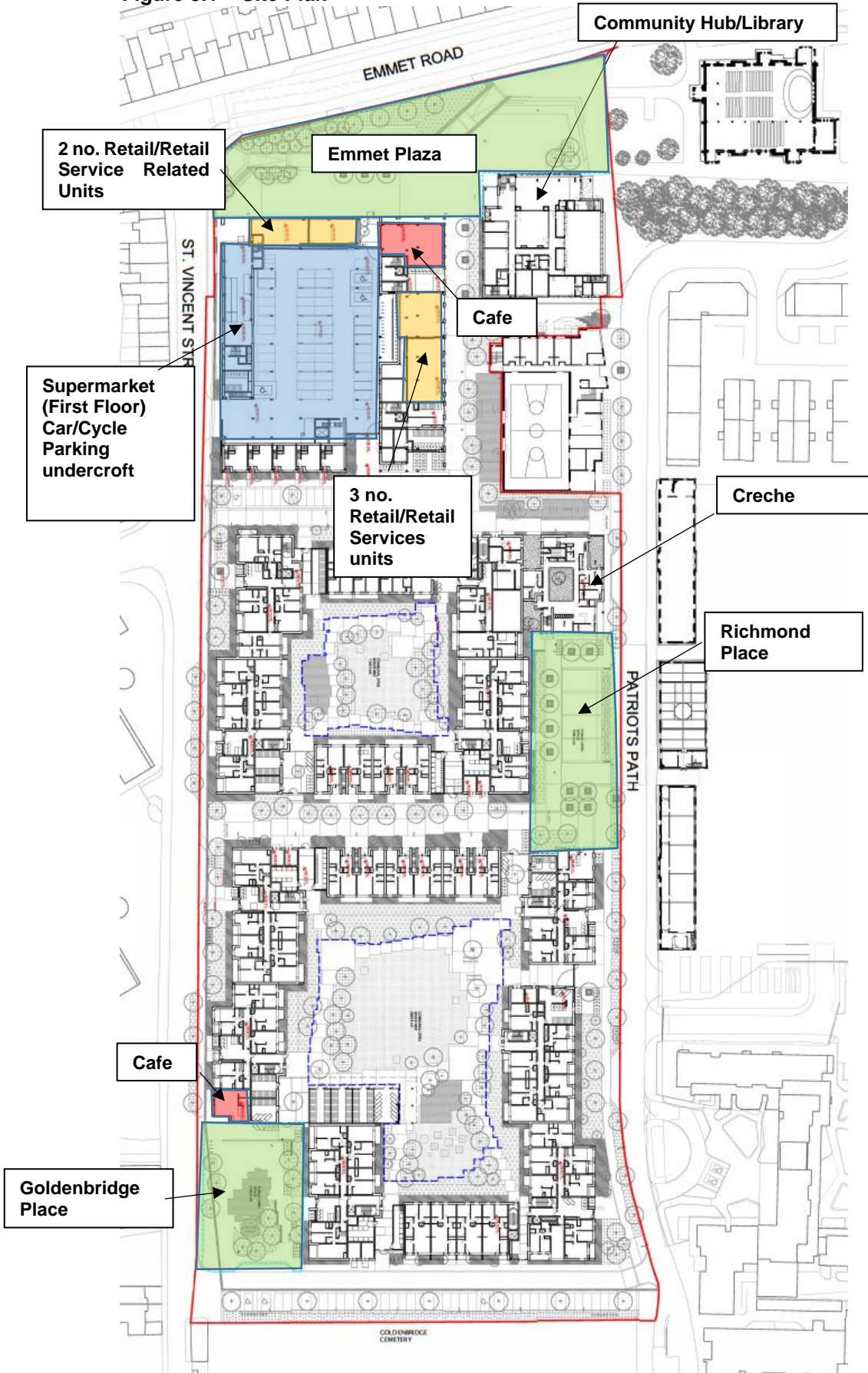
Figure 2.2 – Site Location



3.0 DESCRIPTION OF THE RETAIL/COMMERCIAL/COMMUNITY ELEMENTS OF THE PROPOSED DEVELOPMENT

The proposed development at Emmet Road will consist of a residential and mixed-use development comprising c. 578 no. apartments, community facilities (community hub/library creche, 5 no. retail/retail service-related uses, 2 no. café/restaurant units including a supermarket and public plaza fronting onto Emmet Road Inchicore Dublin 8 on a site of c. 4.68 hectares.

Figure 3.1 – Site Plan



Note: Names on Open Spaces indicative and for illustrative purposes only

The supporting community and commercial elements of the proposed development (of some 6,951 sq. m) will comprise:

Table 3.1 - Summary of Proposed Community and Commercial Elements

Use	Area
Creche	816 sq. m
Community hub/library	2,810 sq. m
2 no. café/restaurant units	285 sq. m
Supermarket	2,476 sq. m
5 no. retail/retail related service units*	564 sq. m
Total	6,951 sq. m

*retail/café/restaurant/class 2 financial services units

3.1.1 Mixed Use - Development Area

The northern portion of the project site includes the mixed use area which will comprise the provision of a mixed-use block (of up to 7 storeys) consisting of 91 no. apartments (10 no. studio apartments, 29 no. 1 bedroom apartments, 43 no. 2 bedroom apartments & 9 no. 3 bedroom apartments), communal open space at second floor level supermarket of c. 2,476 sq. m GFA (c. 1,765 sq. m net retail sales area, including off-licence area), café (c. 205 sq. m), 5 no. retail/retail service related units (c. 564 sq. m), with undercroft car and cycle parking.

3.1.1.1 Neighbourhood Store

At first floor level, the mixed-use building provides a supermarket of c. 2,476 sq. m GFA (c. 1,765 sq. m net retail sales area, including off-licence area).

3.1.2 Café/Retail/Retail Related Services units

It is proposed to provide a cafe c. 205 sq. m located to the west of the proposed community hub/library building which includes 2 no. retail/ retail related services units fronting onto Emmet Plaza and 3 no. retail/ retail related services units located along the internal pedestrian north-south pedestrian route, located between the community hub/library/(existing Inchicore Community Sports Centre) and the mixed use building. The southern frontage of the block includes own door residential units. The design of the building is to present active frontages which will provide animation and activity and enhanced passive surveillance. An additional café of c. 80 sq. m is proposed fronting onto the public open space at Goldenbridge Cemetery.

3.1.3 Library and Community Hub

It is also proposed to provide a community hub/library (4 no. storeys) of c. 2,810 sq. m. The building offers an opportunity to co-locate community facilities, comprising a public library and community hub, with mutual benefits arising from the synergies between both. The building presents its main façade to the new civic plaza opening up to Emmet Road, framed by St. Michael's church and the remains of Richmond Barracks boundary wall.

3.1.4 Crèche

Located centrally within the development, it is proposed to provide a creche of c. 816 sq. m, which will front onto the open space in front of Richmond Barracks.

4.0 RETAIL PLANNING POLICY

The accompanying Planning Report, prepared by John Spain Associates, submitted in conjunction with this Part 10 planning application includes a comprehensive review of the relevant national, regional, county, and local planning policy context. This section of the RIS summarises the key issues and addresses the more relevant retail policies and objectives in greater detail, in particular the Retail Planning Guidelines 2012, Retail Strategy for the Greater Dublin Area 2008-2016, the Dublin City Development Plan 2016-2022, and the Draft Dublin City Development Plan 2022-2028.

4.1 RETAIL PLANNING- GUIDELINES FOR PLANNING AUTHORITIES, 2012

The Department of Environment, Heritage and Local Government published new Retail Planning Guidelines in April 2012. The aim of the Guidelines is to ensure that the planning system continues to play a key role in supporting competitiveness in the retail sector for the benefit of the consumer in accordance with proper planning and sustainable development.

The Guidelines emphasise that enhancing the vitality and viability of city and town centres in all their functions through sequential development is an overarching objective in retail planning.

The Guidelines have five key policy objectives, namely:

- *Ensuring that retail development is plan-led.*
- *Promoting city/town centre vitality through a sequential approach to development.*
- *Securing competitiveness in the retail sector by actively enabling excellent quality development proposals to come forward in suitable locations.*
- *Facilitating a shift towards increased access to retailing by public transport, cycling and walking in accordance with the Smarter Travel Strategy; and*
- *Delivering quality urban design outcomes.*

The application site is located within Inchicore on Z14 zoned lands which comprise SDRA 9 St. Michael's Estate. Specifically, the site is adjacent to the Neighbourhood Centre Z4 zoned area of Inchicore and therefore is designated as an edge of centre site. Additional Z3 lands are located on Emmet Road.

4.1.1 Guidance on Edge of Centre Sites

Regarding edge of centre, the guidelines note:

*“Where, following the sequential approach, the consideration of an edge-of-centre site becomes necessary, the applicant and the planning authority must ensure that edge-of-centre sites are within easy walking distance of the identified primary retail area of the city or town. The distance cannot be defined precisely as different centres vary in their size and scale but **should not be further than 300 to 400 meters. Generally, edge-of-town sites should be adjacent to the boundary of the central area**, but consideration should also be given to the local context, including the function and the character of the site in relation to the city/town centre as well as the ease of movement between the site and the city/town centre in terms of physical linkages and barriers such as any necessity to cross major roads and car parks”.*

The Dublin City Development Plan 2016-2022 and the Draft Dublin City Plan 2022-2028 sets out a vision for the future development of the SDRA 9 lands. Specific guiding principles which support the redevelopment of the site for mixed uses are provided and the proposed development is fully in accordance with these objectives as detailed within the Planning Report, prepared by John Spain Associates, submitted with this Part 10 application.

4.1.2 Sequential Approach

The Guidelines recommend the Sequential Approach to retail development and include the following sections which are relevant to edge of centre sites:

“Subject to the requirements below, only where the applicant can demonstrate, and the planning authority is satisfied, that there are no sites or potential sites within a city, town centre or designated district centre should an edge-of-centre site be considered. In addition, only in exceptional circumstances where it can be demonstrated that there are no sites or potential sites available either within the centre or on the edge of these centres should an out-of-centre site be considered.”

“Where retail development in an edge-of-centre site is being proposed, only where the applicant can demonstrate and the planning authority is satisfied that there are no sites or potential sites including vacant units within a city or town centre or within a designated district centre that are (a) suitable (b) available and (c) viable, can that edge-of-centre site be considered”.

The application site is located within Inchicore on Z14 zoned lands which comprise Strategic Development Regeneration Area 9. The site is located adjacent to the Neighbourhood Centre Z4 zoned area of Inchicore on Emmet Road and also adjacent to the Z3 neighbourhood zoning to the north and northeast of the subject lands along Emmet Road and therefore is designated as an edge of centre site.

Therefore, there is a requirement to apply the sequential approach to the proposed development. Appendix 1 of this RIS has undertaken a sequential test in the locality and there are no available, viable sites located between the subject site and the Urban Village of Inchicore. Having regard to the findings of the sequential test, it is considered that location of the proposed development is appropriate and satisfies the requirements of the sequential approach as set out in the Retail Planning Guidelines.

4.2 RETAIL STRATEGY FOR THE GREATER DUBLIN AREA 2008 – 2016

The Retail Strategy for the Greater Dublin Area 2008 – 2016 was published in July 2008 by the Dublin and Mid-East Regional Authorities. The Strategy aims to set out a co-ordinated, sustainable approach to the assessment and provision of retail within the GDA. The Strategy emphasises the role and importance of District Centres within the GDA Retail Hierarchy.

The subject site is an edge of centre site in Inchicore. Inchicore is designated as a Level 4 Neighbourhood Centre within the GDA Retail Hierarchy as set out in Table 6.1 of the Retail Strategy. The Retail Planning Strategy for the GDA 2008 acknowledges the importance of Neighbourhood Centres and note that *“encouragement should therefore be given to uses which support the community and help solidify the role of the village/small town as an important local centre such as medical clinics, social services, pharmacies, cafes and post offices”.*

Regarding edge of centre sites, the guidelines note that:

*“The Guidelines confirm that the preferred location for new retail development, where practicable and viable, is within town centres (or district or major village centres). However, where it is not possible to provide the form and scale of development that is required on a town centre site, **consideration can be given to a site on the edge of a town centre, providing it is within an easy and convenient walking distance from the primary shopping core of a town centre.**”*

“A sequential approach should be applied to selecting sites for new retail development. Only where it has been determined that there are no sites within a town centre or an edge-of-centre

location by virtue of size, availability, accessibility, and feasibility, should an alternative out of centre site be considered”.

“Quantitative and qualitative need must, however, be examined as part of any proposed application which would be in an edge or out of centre location and/or not in accordance with retail strategy hierarchy alongside a full sequential test of the proposed location.”

“There is in this strategy a general requirement to demonstrate ‘need’ for any retail development in edge or out of centre locations. In the normal course any additional floorspace should be directed towards improving/extending existing centres where appropriate.”

The proposal is within walking distance of the Neighbourhood Centre of Inchicore (zoned Z4) which is located adjacent to the subject site. A qualitative, quantitative, and sequential test has been conducted and shows that the proposed development is acceptable on site.

Regarding the size and retail uses within neighbourhood centres the strategy allows for a convenience retailer up to 2,500 sq. m. net and a range of supporting retail shops. The proposal provides for a convenience retail anchor (c.1,762 sq. m. net) 2 no. cafés (c. 280 sq. m) / as well as 5 no. retail/retail related services space (c. 564 sq. m.).

“Neighbourhood/Small Town/Village Centre- These centres generally provide for one supermarket or discount food store ranging in size from 1,000-2,500 sq.m with a limited range of supporting shops (one or two low range clothes shops with grocery, chemist etc.) and retail services (hairdressers, dry cleaners, DVD rental) cafes and possibly other services such as post offices or community facilities, or health clinics grouped together to create a focus for the local population”. (Part 6, Pg 71)¹.

The quantum of retail development proposed is in keeping with the above description contained in the Retail Strategy for the Greater Dublin Area 2008.

4.3 DUBLIN CITY DEVELOPMENT PLAN 2016-2022

The subject site is situated within the administrative area of Dublin City Council and under the provisions of the Dublin City Development Plan 2016-2022 (“The City Plan 2016”) a Strategic Development Regeneration Area zone (SDRA 9) which has a land use zoning objective ‘Z14’. The objective of these lands is:

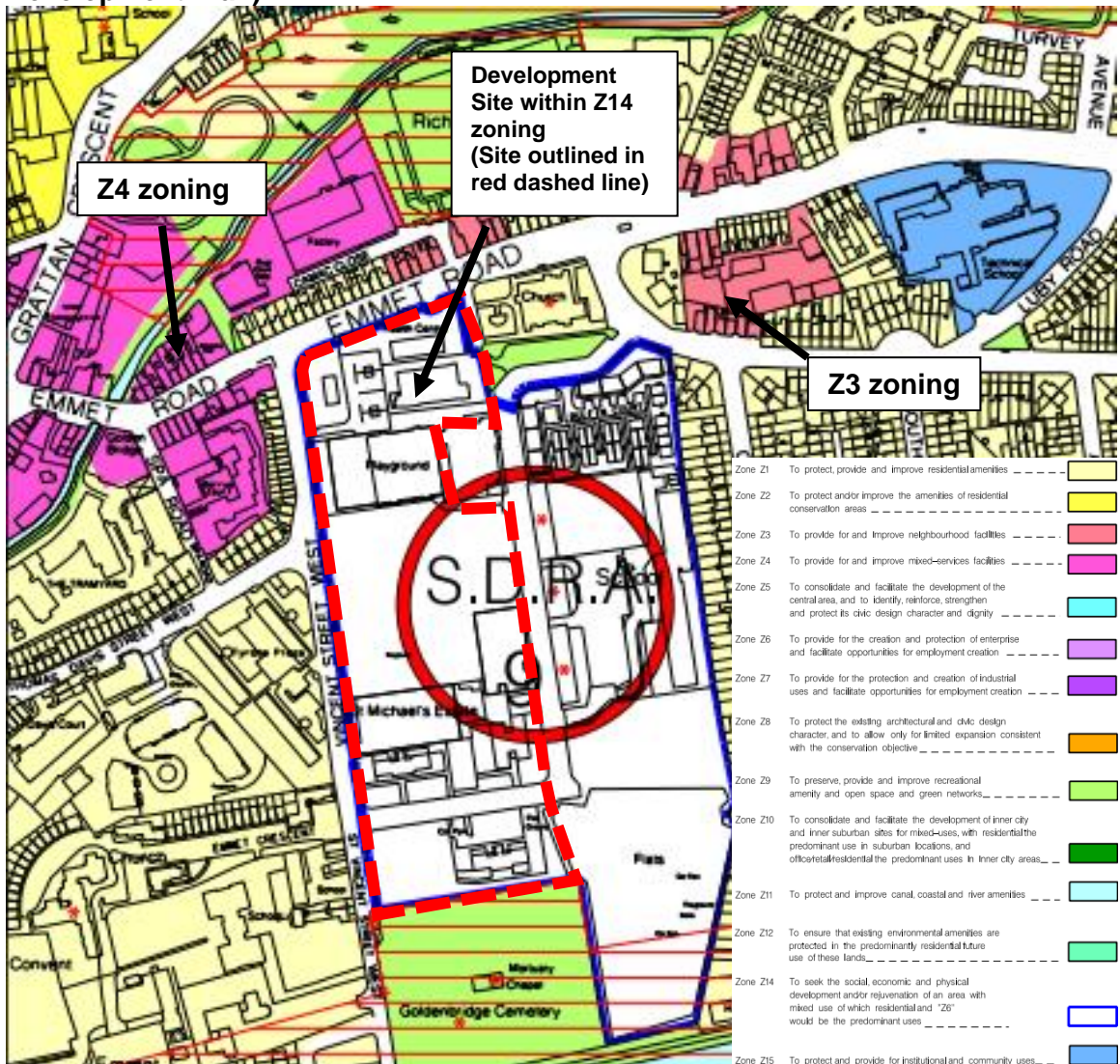
“To seek the social, economic, and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use.”

The Z14 ‘Permissible’ uses are:

*“Betting office, buildings for the health, safety and welfare of the public; **childcare facility**, community facility, conference centre, **cultural/recreational building and uses**, education, embassy office, embassy residential, enterprise centre, green/clean industries, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, offices, **open space**, park and ride facility, part off-licence, place of public worship, public service installation, **residential**, restaurant, science and technology-based industry, **shop (neighbourhood)**, training centre.”*

¹ <https://emra.ie/dubh/wp-content/uploads/2015/02/Greater-Dublin-Area-Retail-Strategy-2008-2016.pdf>

Figure 4.1 – SDRA 9. St Michael’s Estate Land Use Zoning (2016-2022 Development Plan)



The proposed uses which comprise residential, retail/retail related services, community hub/library, creche and open space are permitted in principle uses. The proposed development includes proposals for additional physical and social infrastructure to support the residential development.

Inchicore is identified in Table 7.1 of the City Plan 2016 as a Level 4 centre (Neighbourhood Centre and Local Centre) in the Retail Hierarchy.

It is the Objective of Dublin City Council:

“RDO1: To implement the retail hierarchy contained in the retail strategy of this development plan i.e., the city centre retail core, the district centres/urban villages, neighbourhood centres/shopping parades, local shops.”

It is the Policy of Dublin City Council:

“RD18: To ensure the adequate and appropriate retail provision in the emerging or key developing areas such as Cherry Orchard/Park West, North Fringe, Pelletstown and the Docklands.”

RD19: To promote the retail provision in the key district centres, district centres and neighbourhood centres, including the revitalisation of existing established centres (see Appendix 3 Retail Strategy)."

The proposed development provides for a mixed-use development at Emmet Road which will revitalise an underutilised site. The proposal is consistent with the above policies and objectives. The proposal provides primarily for a convenience retail unit which will support the local and future population in the area.

4.3.1 Convenience Shopping

Section 7.6.5 of the City Plan 2016 recognises that the provision of superior quality convenience, speciality, and retail service shopping to cater for daily shopping needs is critical to attract and retain residents, especially families with children, as well as businesses in the inner city.

It is the Policy of Dublin City Council:

"RD20: To promote and facilitate the provision of accessible good quality convenience shopping with strong choice and competition within the inner city area and to develop areas to ensure that adequate provision is made for the increased population now living in the city; to reduce the numbers travelling to outer suburbs to meet their convenience needs and to attract and retain families with children in the city, as set out in the retail strategy for the Greater Dublin Area."

Inchicore is served by small scale convenience stores in the form of a Eurospar and Tesco Express. No 'neighbourhood shop' (comprising of a convenience shop of between 1,000-2,500 sq. m net, as defined in Appendix 15 of the City Plan 2016) exist within Inchicore or its retail catchment detailed below. The largest convenience store within the catchment area is Tesco Express (310 sq. m.). An Aldi is currently located approximately 1.9km to the west of the subject site along Kylemore Road and a Dunnes Stores is located approx. 1.4km to the southeast of the subject site along Crumlin Road.

4.3.2 Retailing in the Wider City

The City Plan 2016 highlights that retail provision has a significant role to play in the creation of vibrant centres and sustainable neighbourhoods in both traditional urban villages and in the more recent developing areas such as the North Fringe, Pelletstown and Ballymun.

In addition, the City Plan acknowledges that retail provision in developing areas will become more important as the city's population increases, *"requiring quality services at a local level in line with the core strategy. Dublin City Council will encourage appropriate retail provision throughout the city in accordance with the settlement and retail hierarchy as set out in the core strategy and retail strategy (see Chapter 2 and Appendix 3)."*

4.3.3 Appendix 3 DCC City Plan 2016

Table 1 of the Retail Strategy outlines the Retail Hierarchy for the City from Level 1 (City Centre), Level 2 (Major Towns [none in DCC]), Level 3 (District Centres). In addition, the following are outlined:

"Level 4 Neighbourhood Centres Neighbourhood Centres These centres provide a local focus for the population and normally consist of one supermarket-sized development up to 2,500 sq.m net retail floorspace with a limited range of supporting shops such as a grocer or chemist"

and retail services like a hairdressers and other services such as post offices or health clinics grouped together.”

Table 2 of the Retail Strategy defines the following types of retail relevant to the subject lands:

“Neighbourhood Anchor Store 1,000–2,500 sq.m range supermarket anchoring a neighbourhood centre.”

Inchicore is a Level 4 centre. The size of the proposed neighbourhood shop at 1,765 sq. m accords with Tables 1 & 2 of the retail strategy; by providing a Neighbourhood Anchor Store will enhance the retail provision for existing residents within Inchicore and the surrounding residential areas and the future residential population arising from the proposed 578 no. dwellings.

4.3.4 Strategic Development and Regeneration Areas (SDRAs)

The retail strategy for the Greater Dublin Area states the following in relation to SDRAs that,

“It is important that where large areas of new housing are planned that new retail centres are provided in tandem with housing, at a scale appropriate to meet the regular convenience and lower order comparison shopping needs of these communities. It further states that in granting such development, cognisance should be taken of existing retail in other areas, but that retail provision in such growth areas should not be restricted based on permitted retail development in existing areas and the quantum set out in the regional strategy, emphasising instead the need for overall regard to patterns of sustainable travel and community viability. The retail strategy for Dublin City Council supports the national and regional policy approach to retail provision in growth areas. The main growth of developing areas for the lifetime of this development plan are identified as strategic development and regeneration areas (SDRAs) in the core strategy, such as the North Fringe, Pelletstown and the Naas Road.”

The plan seeks a natural extension of the existing village of Inchicore by providing a mixed-use component to the north of the subject lands. The guiding principles of the SDRA 9 St. Michael’s Estate seek the following:

“The development of a high-quality, vibrant, mixed-use urban quarter will be promoted; new facilities will be in accessible locations and will maximise the opportunities to connect with the wider neighbourhood

The development will complement the regeneration of Inchicore by encouraging a natural extension of the village centre eastwards along Emmet Road; the development will provide strong connections between the site and the functions of the village centre, for which a local environmental improvements plan is proposed.”

The proposed development will provide a vibrant mixed use urban quarter with connections to Inchicore village.

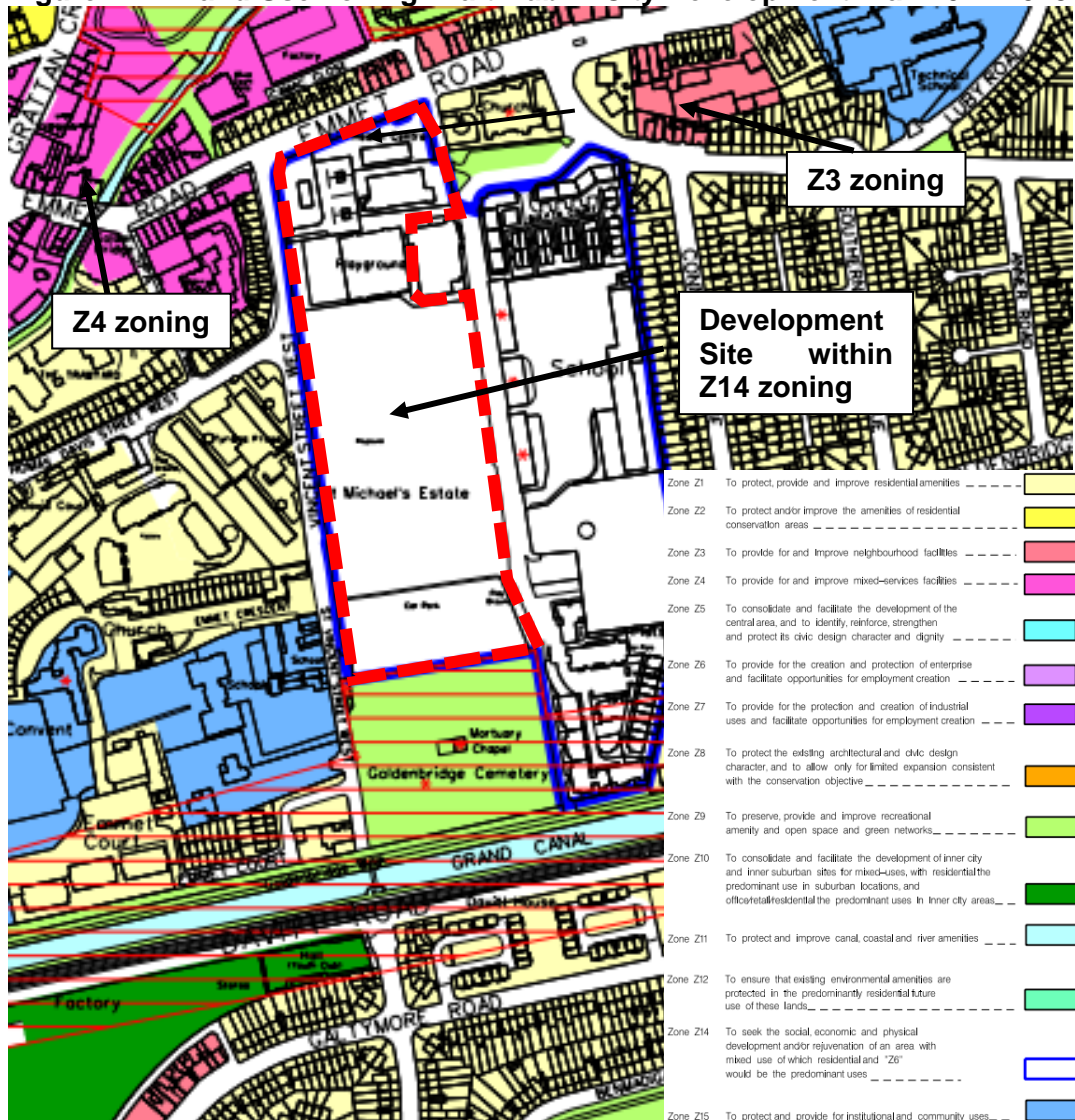
4.4 DRAFT DUBLIN CITY DEVELOPMENT PLAN 2022-2028

4.4.1 Land Use Zoning

The subject lands have a Land-Use Zoning Objective Z14. The objective of the Z14 land use zoning objective is:

“To seek the social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use”.

Figure 4.2 – Land Use Zoning Draft Dublin City Development Plan 2022-2028



The Z14 ‘Permissible’ uses are:

“Assisted living/retirement home, beauty/ grooming services, bed and breakfast, buildings for the health, ~~{Build To Rent residential,}~~² safety and welfare of the public, café/ tearoom, childcare facility, community facility, conference centre, craft centre/ craft shop, cultural/recreational building and uses, delicatessen, education, embassy office, embassy residential, enterprise centre, financial institution, guesthouse, halting site, home-based

² (Note: text includes proposed material amendments to Draft City Development Plan in **strikethrough** and **proposed**)

economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, mobility hub, office, off-licence, off licence (part), **open space**, park and ride facility, place of public worship, primary health care centre, public house, public service installation, **residential**, restaurant, science and technology-based industry, **shop (local)**, **shop (neighbourhood)**, sports facility, student accommodation, take-away, training centre, veterinary surgery.”

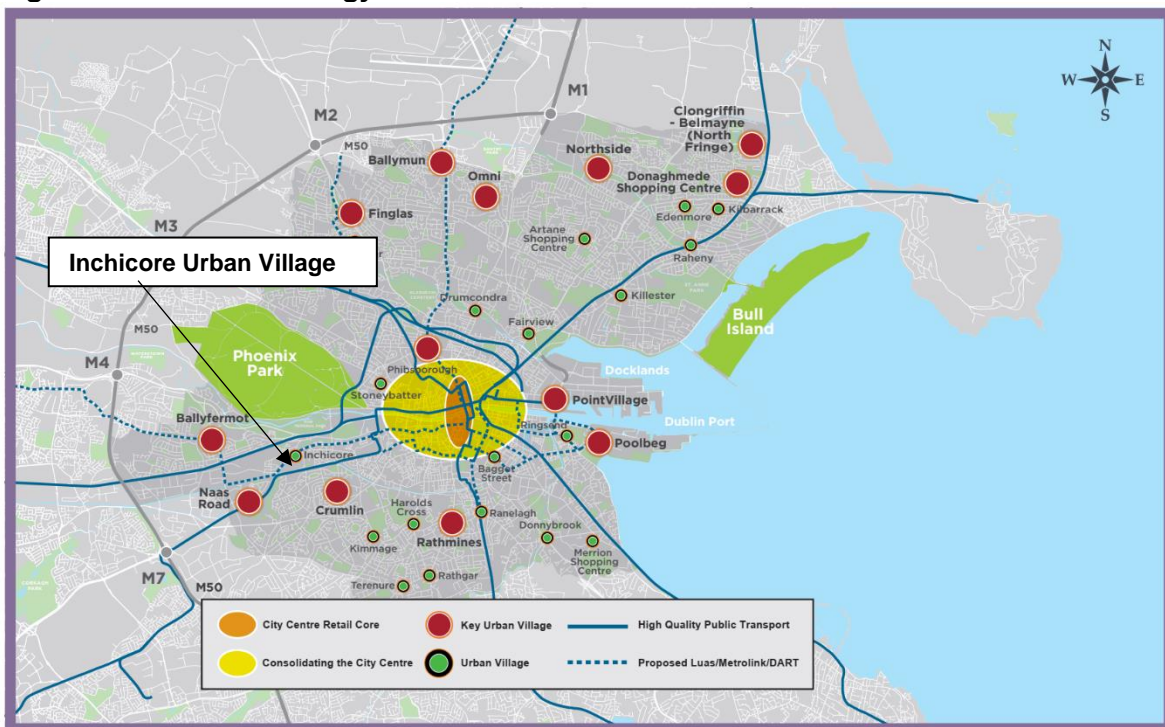
It is noted ‘Shop neighbourhood’ is defined in Appendix 15 of the Draft City Development Plan as follows:

“*Shop: Neighbourhood: A neighbourhood shop is one which primarily serves a local community and does not generally attract business from outside that community. They will primarily serve a ‘walk-in’ population and have limited car parking. A neighbourhood shop may include a supermarket or discount food store ranging in size from 1,000 sq. m to 2,500 sq. m. net retail floorspace.*”

The proposed neighbourhood shop (1,765 sq. m net) will serve the local community and the floorspace is within the range indicated above in the Draft Plan. The retail catchment illustrated in Section 6 below shows that the catchment is very much intended to serve the existing local community and new residential community of 578 no. apartments arising from the proposed development. The proposed car parking for the neighbourhood shop is 22 no. spaces located at undercroft level, and also includes additional parking of 54 no. spaces overall (which can cater for other uses within the proposed development).

The proposed uses which comprise residential, supermarket, community hub/library, creche and open space are permitted in principle uses. The proposed development includes proposals for additional physical and social infrastructure to support the residential development.

Figure 4.3 – Retail Strategy



Source: Figure 7.1 Draft Dublin City Development Plan 2022-2028

The Draft City Development Plan recognises the importance of Urban Villages and Neighbourhood Centres and notes the following,

“These urban villages and neighbourhood centres have a key role to play in the creation of sustainable neighbourhoods in both the established urban villages and in developing areas”.

4.4.2 Retail Policies

The following policies and objectives are relevant to the proposed development:

“CCUV2 Retail Hierarchy To implement the retail hierarchy contained in the ‘Retail Strategy’ of this Development Plan and to support retail development at all settlement levels in the city. Retail development within the hierarchy of centres will be of a scale, type, and nature that reflects and enhances the role and function of the centre within which it is proposed as per the Retail Strategy, Appendix 2.”

The scale of the quantum of the retail element of the proposed development is in accordance with the Retail Strategy as set out in Appendix 2 of the Draft City Development Plan. Inchicore is designated as a Level 4 centre in the retail hierarchy for Dublin City. The Retail Strategy notes that Urban Villages:

“Their Functions include local / weekly convenience; small comparison retail; Food and beverage; cultural and leisure functions; specialist / niche /Independent retailing and community and social services. These centres by reason of their variety of offer and level of concentration around the city add to the vibrancy and vitality of the city.”

The proposed development will provide a local/weekly convenience neighbourhood shop at a scale which is in accordance with the Retail Strategy.

“CCUV3 Sequential Approach To promote city centre and urban village vitality through the sequential approach to retail development, enable good quality development in appropriate locations, facilitate modal shift and to deliver quality design outcomes.”

The proposed development is in accordance with the sequential approach is considered to be an “edge of centre” site. Appendix 1 of this RIS provides more detail in respect of other sites reviewed. The site is located adjacent to the Urban Village of Inchicore, within walking distance and easily accessible to the urban centre.

“CCUV6 To ensure that large scale retail / mixed use development proposals match the capacity of existing and planned public transport; provide excellent quality street environments to provide safer and more attractive settings for people to shop / do business; and incorporate cycle and pedestrian friendly designs in line with the Retail Design Manual 2012.”

While the proposed development does not comprise a large-scale retail development, the proposed development is located beside several high frequency transport routes (bus and Luas) and is ideally situated to support the mixed-use development (further detail on frequency and capacity of public transport is provided in the OCSC Traffic and Transportation Assessment, included with the Part 10 development). The proposed development will enhance the retail/retail related services provision within the urban village of Inchicore. The design team has designed a high-quality proposal that complies with the Retail Design Manual 2012.

“CCUV20 Mixed Use Key Urban Villages/Urban Villages To support the development, regeneration and or consolidation of Key Urban Villages/urban villages as appropriate, to ensure these centres continue to develop their mixed used role and function adding vitality to these centres including through the provision of residential development.”

“CCUV21 Scale of Retail Development in Key Urban Villages/ Urban Villages To have regard to the guiding principles regarding the scale of retail development to be promoted in each Key Urban Village as set out in the Dublin City Retail Strategy in Appendix 2.”

“CCUV26 To support and facilitate local shopping and retail services commensurate with new residential areas to provide day to day and top up shopping needs.”

With reference to policies CCUV20, CCUV21 & CCUV26, the proposed scale of retail development is in accordance with Appendix 2 of the Draft Retail Strategy. In addition, the proposed development includes a mix of uses, including residential development. The proposed development aims to revitalise an underutilised site to provide a mixed-use development which will enhance the retail offer for existing residents in the catchment and will also provide a day to day top up shopping needs of both existing and future residents within the catchment. The area of Inchicore has an under provision of neighbourhood convenience retail. The retail facilities proposed will support the future and existing residents in the local area.

“CCUV27 To promote 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 Key Urban Villages, urban villages, and neighbourhood centres.”

The subject lands are located within SDRA 9. The proposed development provides for a convenience retail anchor that will support future and existing residents within the urban village of Inchicore. The proposed neighbourhood shop will enhance the vitality and viability of the urban village of Inchicore.

“CCUV28 To support and promote the development of retail service development at all levels of the retail hierarchy in the city.”

The proposed development provides for a mixed-use development which contains a retail component. This development is in a location that sits on level 4 of the retail hierarchy.

4.4.3 Appendix 2 Retail Strategy

The Retail Strategy for the Draft City Development Plan acknowledges the importance of Inchicore as an Urban Village and recognises the need for convenience retail at these locations:

‘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.’

The proposed development provides an appropriately scaled convenience neighbourhood shop within the Strategic Regeneration Development Area (SRDA 9).

Scale and Location of Retail Development

The Strategy provides guidance on the location and scale of retail development. Regarding Urban Villages the Draft City Development Plan recognises the need to consolidate and enhance these areas to meet the need of the local population. The role of urban villages is primarily to support convenience retail.

‘The consolidation and enhancement of urban villages is an objective of this plan to ensure that these centres continue to develop their mixed-use inner city, inner / outer suburban role, and function with a level of retail appropriate to their location. It is an objective of this plan that large scale comparison retail proposals be directed to the City Centre Retail Core.’

The proposed development provides a mix of uses and a scale of retail development commensurate with the role and function of Inchicore as an Urban Village (level 4) centre on the Retail Hierarchy.

Sequential Approach

Regarding edge of centre sites, the plan outlines the following,

“Where retail development on an edge of centre site is being proposed, only where it can be demonstrated and the planning authority is satisfied that there are no sites or potential sites including vacant units within the city centre or a KUV/ UV or neighbourhood centre that are (a) suitable (b) available and (c) viable, can an edge of centre site be considered. An edge of centre site is normally within walking distance of and easily accessible to an urban centre.”

The subject lands are situated on SDRA 9 lands immediately adjacent (and within easy walking distance) to the Urban Village of Inchicore (Z4 zoned lands). The proposal primarily provides a “Shop Neighbourhood” scale of development. A sequential test has been undertaken and is included within Appendix 1 of this Retail Impact Statement, which confirms that there are no available viable sites within the Z4 lands.

Guidance on Specific Forms of Retail

The guidance notes the maximum size of convenience retail floorspace in Dublin City is 4,000 sq. m. net retail floorspace. Regarding edge of centre development locations, the Draft City Development Plan notes the following,

“Edge of centre locations for such developments may be appropriate subject to the provisions of the sequential approach as outlined above. It is acknowledged that many urban centres due to their historic layout, land use patterns and site ownership have a lack of sites suitable to accommodate the larger format convenience operators. This is also acknowledged in the Retail Planning Guidelines, 2012.”

The proposed development is proposing a convenience retail anchor of 2,476 sq. m within an edge of centre location on SDRA lands.

Having regard to the above, it is considered that the proposed development is fully in accordance with the retail policies and objectives pertaining to the site as set out within the Draft Dublin City Development Plan 2022-2028.

Kilmainham-Inchicore Development strategy – Non-Statutory Study

The Dublin City Council’s Kilmainham-Inchicore Development Strategy (published February 2021) is a non-statutory high-level study to address opportunities for urban regeneration and placemaking in the Kilmainham-Inchicore area and forms the basis of the Dublin City Council application of the Urban Regeneration and Development Fund (URDF).

The Development Strategy, in the context of planning and regeneration, identifies a public realm strategy to support the following:

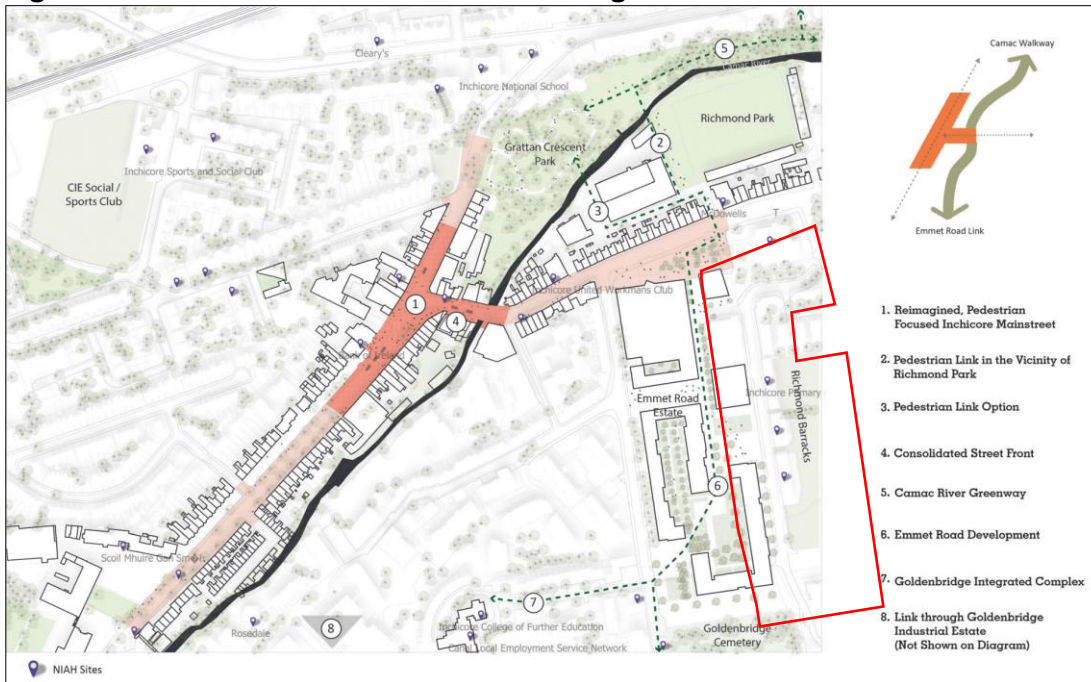
- *A strong sense of community.*
- *Greater use of existing amenities and assets.*
- *A mix of residential tenures and typologies.*
- *Sustainable employment opportunities*

With reference to Inchicore, the Development Strategy notes that:

“Inchicore Village’s existing public realm is defined by its location on Tyrconnell Road and by the busy junction of Tyrconnell Road, Grattan Crescent and Emmet Road. The Village core runs north to south along Tyrconnell Road and is characterised by predominantly two storey retail units and houses.”

The key projects in the Kilmainham-Inchicore Development strategy include the consolidation of the Tyrconnell Road and Emmet Road junction and the creation of the Camac River Greenway as a biodiversity, recreational and amenity space. The aim is to deliver an improved public realm that promotes and facilitates active travel, supports the viability of local services and amenities, and provides for the integration of longer-term opportunity sites.

Figure 4.4 – Enhancement of Inchicore Village



Project no. 2 Kilmainham-Inchicore Development strategy

The Camac River Greenway could stretch approximately 1km along the existing river course through Kilmainham-Inchicore from the Grand Canal to the Royal Hospital Kilmainham. The greenway could be bookended by two open space areas, the existing Grattan Crescent Park and a potential new open space and recreational area in Kilmainham, that will also improve accessibility to the river.

The Development Strategy outlines that:

“Kilmainham-Inchicore is characterised as a mix tenure neighbourhood with a combination of suburban housing typologies, with some modern apartment developments. Dublin City Council’s Emmet Road regeneration project will set the benchmark in the area for high quality residential development with a range of facilities including retail and community.”

4.4.4 Conclusions

This retail planning policy review has confirmed that the proposed development is consistent with the strategic aims and objectives set for the proper planning and sustainable development of the SDRA 9 lands. The proposed development which includes 1,765 sq. m of net retail floorspace along with 564 sq. m of retail/ retail/retail related services floorspace (in 5 no. units) and 285 sq. m of restaurant and café floorspace (2 no. units) within the SDRA 9 lands is fully in accordance with and supported by the policies and objectives of the Retail Planning

Guidelines, the Retail Strategy for the Greater Dublin Area, the current Dublin City Development Plan 2016-2022 and Draft Dublin City Development Plan 2022-2028. The proposed development is therefore considered to be in accordance with the proper planning and sustainable development of the area.

5.0 QUALITATIVE ASSESSMENT

5.1 INTRODUCTION

A health check assessment is an integral part of any retail impact assessment. Annex 2 of the Retail Planning Guidelines 2012 sets out the matters that should be considered when assessing the vitality and viability of town centres. It is based on a qualitative analysis of factors such as the range and quality of activities in a centre, the mix of uses, the accessibility of the centre to people living in the area, and the general amenity, appearance, and safety of the area. Indicators of a healthy town centre include a low level of vacancy, a high pedestrian footfall and a pleasant and inviting public realm which is well maintained.

The Retail Planning Guidelines 2012 set out a series of indicators which can be used to measure the “health” of a town centre and can offer a framework for assessing vitality and viability of a town centre. The indicators as set out in Annex 2 of the guidelines are:

- i. Diversity of uses;
- ii. Competitiveness;
- iii. Retailer representation and intentions to change representations;
- iv. Environmental quality;
- v. Proportion of vacant street level property;
- vi. Accessibility;
- vii. Public realm;
- viii. Pedestrian flows;
- ix. Perception of safety and occurrence of crime.

5.1.1 Inchicore Health Check Assessment

Inchicore is a well-established suburban village centre within the administrative boundary of Dublin City Council. Inchicore is located c. 4km west of Dublin City Centre.

Inchicore is designated as a Level 4 Urban Village (Z4), with some additional Neighbourhood Centre zoned lands (Z3) located to the north of the site and further to the east, within the retail hierarchy as set out in the Retail Strategy for the Greater Dublin Area and the Draft City Plan.

5.1.1.1 Diversity of Uses and Competitiveness

The Z4 Urban Village at Inchicore benefits from a good mix of retail units and non-retail services. Emmet Road which runs along the north of the site comprises a range of services and small-scale convenience and comparison retail units. There are a growing number of restaurants and coffee shops which was observed during the site visit, reflecting a national trend toward combining retail with leisure and dining activity. Retail plays a key role in Inchicore as a source of employment and supporting the residential and business communities.

While not defined in the Draft Dublin City Development Plan, the core retail area of Inchicore is focused near the junction where Emmet Road meets Tyrconnell Road and Grattan Crescent. This area is characterised by a range of commercial, services and retail floorspace.

The Urban Village at Inchicore currently has two main convenience stores (Tesco Express c. (310sq. m. gross and Eurospar c. 130 sq. m. gross) and the proposed retail development will

allow greater customer choice. There is a need for more innovative retail offerings and services for the benefit of consumers as no large-scale convenience retailers exist in Inchicore. Which this retail mix would provide.

5.1.1.2 Retailer representation and intentions to change representations

Inchicore has a limited range of national convenience retailers. With limited choice and competition, a Tesco Express and Eurospar are the only national convenience retailers within the retail catchment area. Several small-scale symbol stores, independent retail units, off-licences and grocery stores are also provided within the retail core.

Inchicore also has a limited comparison retail offer within the area, which would be expected for a Level 4 centre such as Inchicore. The Dublin City Development Plan 2016-2022, the Draft Dublin City Development Plan 2022-2028 and the Retail Planning Guidelines seek to direct comparison retailing and in particular higher order comparison retail floorspace into higher ranked centres (such as Dublin City Centre). Local comparison retailers include pharmacies, and a hardware store.

5.1.1.3 Environmental Quality

The physical condition of the Inchicore retail centre is relatively clean with public bins provided. However, there were small amounts of litter observed on the day of the site visit to Inchicore in August 2022. The streetscape of the village centre is primarily defined by a series of two and three storey buildings with a narrow width plot which creates a fine urban grain development pattern.

Figure 5.1 – Inchicore Shop Front and wall mural in Retail Centre



The environmental attributes of Inchicore include the quality of shopfronts, landscaping, and open spaces. Figure 5.1 illustrates the nature of the shop fronts in the area. This active frontage along Emmet Road creates an inviting atmosphere and sense of place in the local community.

5.1.1.4 Proportion of vacant street level property

The Core Retail Area of Inchicore consists of several retail/ retail services units where Emmet Road meets the Tyrconnell Road and Grattan Crescent and includes a range of commercial

and retail and retail service uses and low levels of vacancy. Along Emmet Road there were multiple retail units which had shutters down during the daytime (Figure 5.2), which detracts somewhat from the quality of streetscape. Nevertheless, the core retail area is generally vibrant and has retained a number of long-established independent retailers, adding to the vibrancy and choice that is on offer.

Figure 5.2 – Emmet Road within Inchicore Village



Figure 5.3 – Tyrconnell Road



5.1.1.5 Accessibility

Inchicore is well served by public transport including Dublin Bus and Luas. The red Luas line runs to the south of the subject lands and is served by Drimnagh and Goldenbridge stops. High frequency Dublin Bus services with multiple routes runs through the Inchicore area with stops located on Emmet Road. This provides services to the city centre and nearby suburbs.

There are some limited street (paid) parking spaces in Inchicore along Tyrconnell Road and Emmet Road

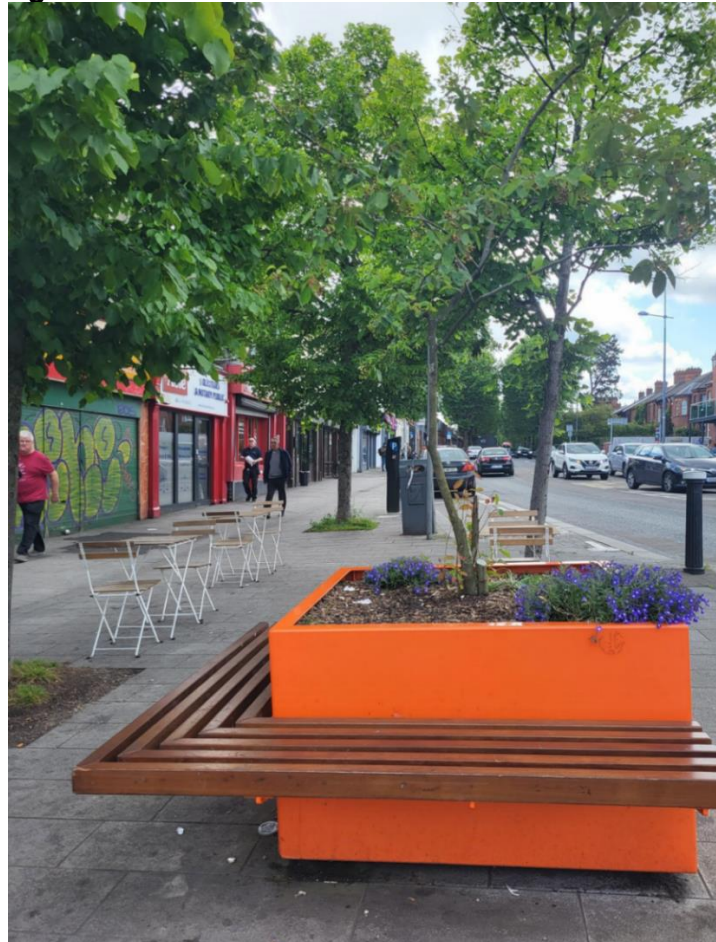
5.1.1.6 Public Realm

The public realm must be an integrated element in the design of the overall development of a street/area, using quality hard and soft landscaping, street furniture, public signage etc.

The character of Inchicore is primarily informed by its suburban location; it's well-established urban structure; its broad mix of uses and retail/retail services offer. The streetscape of the village centre is primarily defined by a series of two and three storey buildings with some buildings reaching 5 storeys.

The main Street is characterised by a fine urban grain and active vertical facades which add to the overall attractiveness of the area. Public realm enhancements in the form of green infrastructure, planting and seating have created an inviting streetscape (Figure 5.4).

Figure 5.4 – Public Realm Enhancement in Inchicore



5.1.1.7 Pedestrian Flows

Pedestrian flows are the numbers and movement of people on the streets, in different parts of the centre at different times of the day and evening. Pedestrian flows observed within Inchicore were greatest along Tyrconnell Road and the west side of Emmet Road. By providing a neighbourhood shop and improvement of the public realm along the Emmet Road, through the inclusion of a civic space, a significant improvement to the public realm, in this respect is to be delivered as part of the subject application.

5.1.1.8 Perception of safety

On the day in which the health check was conducted Inchicore felt like a safe environment in which to navigate. The main streets and the various streets which radiate out all benefit from passive surveillance during daytime business hours. However, as with all town centres, a few secondary streets which do not have a strong retail presence, possess a reduced level of passive surveillance.

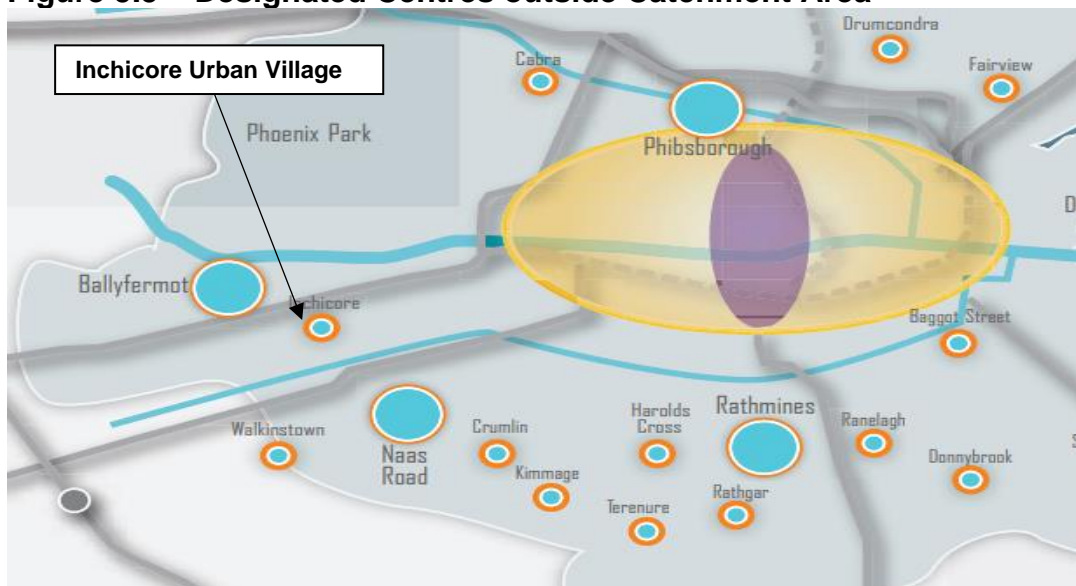
5.1.2 Inchicore Health Check Conclusion

Inchicore appears to be performing relatively well and in accordance with its role as an Urban Village within the City Retail Hierarchy. The centre has a small range of medium-small scale convenience outlets and other retail services and professional services. However a neighbourhood-scale convenience retailer at this location would benefit existing local and future residents.

5.2 DESIGNATED CENTRES OUTSIDE OF THE CATCHMENT AREA

The following section of the Retail Impact Statement provides an overview of the network of District Centres and Neighbourhood Centres outside of but within proximity to the identified catchment area within the Dublin City Council administrative area. The locations of these centres comprise Ballyfermot, Naas Road & Walkinstown.

Figure 5.5 – Designated Centres outside Catchment Area



5.2.1 Ballyfermot

Ballyfermot is designated as a Level 3 District Centre in the Retail Hierarchy for the Greater Dublin Area. The retail core of Ballyfermot is laid out in a linear form along the Ballyfermot

Road. It has a mix of type of retail convenience units as well as some comparison retail units. Ballyfermot is also served via the 40 and 79 bus routes.

5.2.2 Naas Road

The planned District Centre, Naas Road, is designated as a Level 3 District Centre in the Retail Hierarchy under the current development plan, however it has not yet been developed. The plan notes that,

“The Naas Road environs is envisaged to be a settlement of 2,600 residential units, a population of around 5,000 serviced by a retail quantum of 35,000 sq.m”.

Naas Road is characterised primarily by large scale bulky retailers and private car usage is a popular mode of transport due to the layout of this district centre. Multiple industrial estates are present with few convenience retailers present.

5.2.3 Walkinstown

Walkinstown is designated as a Level 4 Neighbourhood Centre in the Retail Hierarchy for the Greater Dublin Area. This local centre provides small scale convenience and comparison functions for the local population.

The industrial area of Ballymount lies within proximity to Walkinstown. This area is similar to the Naas Road and is characterised by large scale bulky retailers. It is predominantly accessible via private car usage with a limited number of bus routes that access the area such as the 27, 77A, 123 and the 56A.

5.2.4 Dublin City Centre

Dublin city centre sits at the top of the retail hierarchy as a Level 1 Metropolitan centre. The wide-ranging retail (convenience and comparison) and commercial offerings within the City Centre ensure that it acts as the primary service centre, for both locals and residents from surrounding towns and settlements. Dublin City is recognised as the primary destination for comparison retailing. The proposed retail development is a convenience retail unit and will not detract from the city centre.

5.3 CONCLUSIONS

The policies and objectives of the Retail Strategy for the Greater Dublin Area and Dublin City Development Plan (2016-2022) and Draft Development Plan 2022-2028 support the provision of an appropriately scaled neighbourhood shop. The nature and scale of the proposed development is commensurate with the Urban Village designation of Inchicore as well as the population of Inchicore retail catchment area and addresses the need for the provision of local convenience shopping, in a way which is efficient, equitable and sustainable as set out as the principal objectives of the Retail Planning Guidelines 2012.

The proposed development does not represent a scale or form of development which has the potential to impact on the vitality or viability of the existing retail centres which are located outside of but in proximity to the identified Inchicore retail catchment area (as set out below in Section 6 of this RIS).

6.0 QUANTITATIVE ASSESSMENT

This section of the RIS will establish the capacity for the proposed development having regard to the estimated expenditure available in the catchment area and existing population and future population projections.

The approach taken is a step-by-step capacity assessment including the following steps:

- Definition of Catchment Area
- Estimate of population at base year 2016 and the design year of 2022.
- Estimate of expenditure per capita on convenience goods at base year and the design year.
- Estimate of total available expenditure in the base year and the design year.
- Estimate of the total turnover capacity of existing convenience floor space in the catchment area.
- Estimate of the likely average turnover for new floor space in the proposal.
- Estimate of the capacity for additional convenience retail floor space in the area.
- Assess the proposal and its likely impact in the context of the capacity assessment.

It should be noted that a quantitative retail impact appraisal of this nature can only provide a broad-brush indication of the likely impact. It involves making forecasts for the future population expenditure, turnover, and other factors. Several inputs must be estimated. Nonetheless, the quantitative study can give a useful overview of the position.

The base year for this assessment is 2016 (the most recent census is yet to publish detailed data). The design year, or test year, is 2028 having regard to the significant scale of the project and the estimated length of time for a decision on the application to be issued, time to complete the detailed design and tender process, for the development to be constructed and to allow for a settling down period of approximately 1 year from opening.

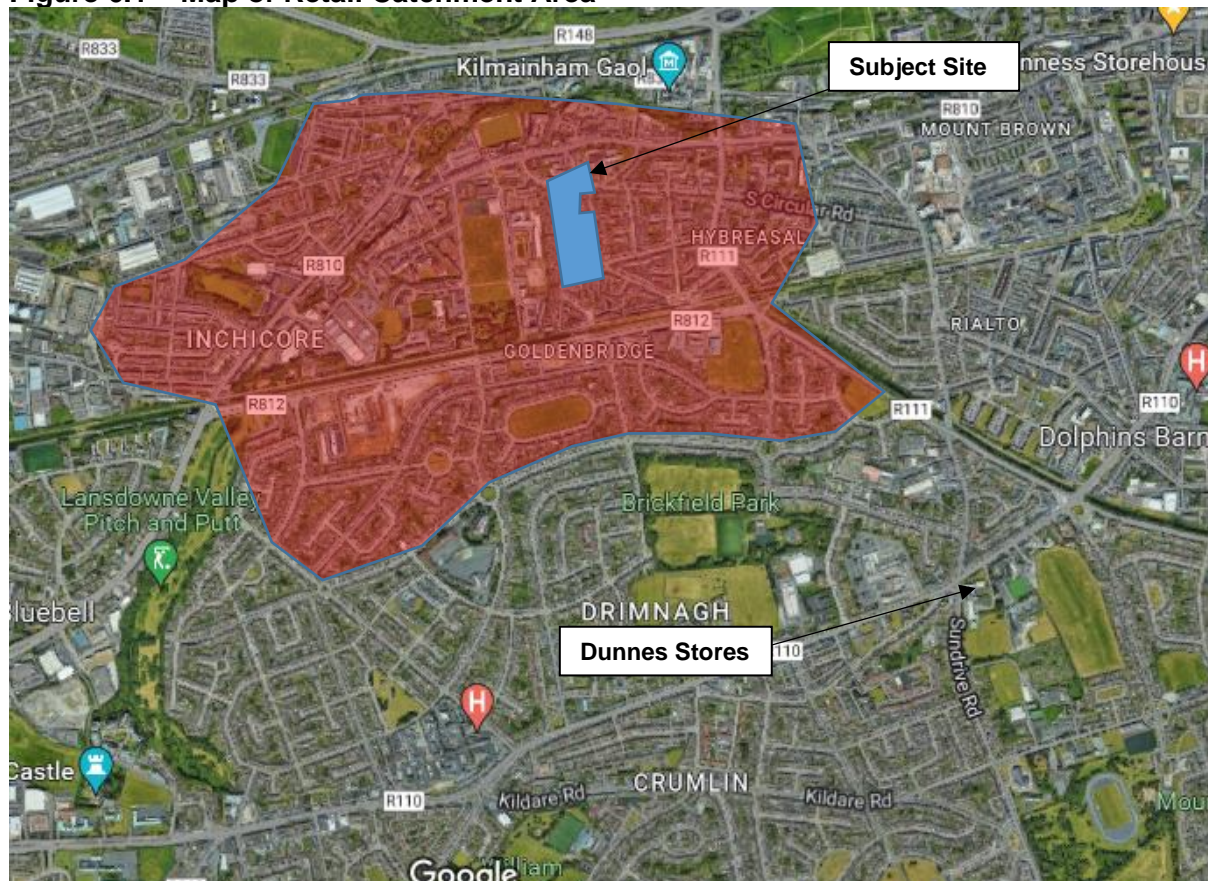
6.1 DEFINITION OF THE CATCHMENT AREA

A key part of a RIS is to identify what expenditure capacity is available to support additional retail floorspace in a catchment area. Definition of a catchment area is a matter of judgement informed by experience and the performance of comparable centres. It depends on factors such as the scale and nature of the development, the distribution of population, planned population growth, travel times / road network and the location of competing centres and developments. These points are taken into consideration in the identification of a catchment area to serve the proposed development.

It is accepted normal practice to define a catchment area having regard to the time it takes to drive to that centre from various locations, the retail offer of adjoining centres and the resulting shopping patterns in the area. This is done using drive time isochrones linking places of equal driving time from a particular location. The drive time isochrones are adjusted to account for likely shopping patterns in the area. However, in inner urban areas such as Inchicore it is more appropriate to define the study area by its spatial character.

The defined catchment area for the purposes of this study is identified in Figure 8.1 below. The catchment area for the study area consists of CSO Small Areas.

The identified catchment area has regard to the proximity of competing centres with similar format retail provision. The existing distribution of supermarkets within proximity to Inchicore including the Aldi located to the west in Ballymount, Aldi located to the southwest along Long Mile Road, Supervalu in Heuston Quarter and Dunnes Stores in Crumlin. Dunnes Stores in Crumlin is the closest (the other stores are further outside the environs of the catchment)

Figure 6.1 – Map of Retail Catchment Area

It is recognised that the catchment area is not a closed subject and there will be expenditure inflows and outflows from the area. In this regard it is noted that a significant proportion of the convenience expenditure would be attributed to the surrounding catchment areas (to Ballyfermot and Crumlin). Notwithstanding this, the catchment area identified for the purposes of this study is confined and is appropriate to the role and function of Inchicore as a mixed-use development with a convenience neighbourhood shop.

6.2 POPULATION OF THE CATCHMENT AREA

The population of the catchment area has been defined based on the 2016 Census Results published by the Central Statistics Office. The existing population of the defined catchment area in 2016 was estimated as 9,829.

In order to provide population projections for the design year we have had regard to the population projections set out within the Core Strategy of the Draft Dublin City Development Plan (2022-2028). According to the Draft Plan, by 2028, the city must accommodate between ~~(21,350 – 31,450)~~ {20,120 – 31,520}³ additional people, up to an overall population target of between 625,750 and 640,000 people by 2028.

The retail catchment population rose 4.85% between the 2011 and 2016 census as shown on Table 6.1. Having regard to the Census figures a 1% population growth per annum is assumed.

³ (Note: text includes proposed material amendments to Draft City Development Plan in ~~strikethrough~~ and proposed)

Table 6.1 – Population in Retail Catchment 2011 - 2028

Year	Population
2011 Population Retail Catchment	9,374
2016 Population Retail Catchment	9,829
2022 Population Retail Catchment (Estimate)	10,434
2028 Population Retail Catchment (Estimate)	11,076

It is noted the proposed development comprises 578 no. apartments. Based on the mix and potential occupancy the proposal could potentially result in a population of c. 1,156 when fully built and occupied (based on 1 person per studio apartment, 1.5 persons per 1 bedroom apartment, 2.5 persons per 2 bed apartment and 3.5 persons per 3 bed apartment).

6.3 EXPENDITURE PER CAPITA

Expenditure per capita is calculated based on the information contained within the Annual Services Inquiry (ASI) published by the Central Statistics Office. The most recent Annual Services Inquiry is the 2016 ASI which was published by the Central Statistics Office. This is the most up to date information available on expenditure per capita. The figures set out within this publication relate to expenditure trends in 2016.

The ASI is listed as the preferred source for expenditure per capita listed in the 1999 Roger Tym and Partners and Jonathan Blackwell and Associates report on the Retail Planning Guidelines and is the most widely used and accepted source of expenditure data. This source is therefore used for the purposes of this capacity assessment.

The CSO have provided information on the most appropriate categories to consider when making estimates on expenditure per capita. The relevant categories include:

1. Retail sale in non-specialised stores (471)
2. Retail sale of food, beverages, and tobacco in specialised stores (472)
3. Retail sale of information and communication equipment in specialised stores (474)
4. Retail sale of other household equipment in specialised stores (475)
5. Retail sale of cultural and recreation goods in specialised stores (476)
6. Retail sale of other goods in specialised stores (477)
7. Retail sale via stalls and markets (478)

In accordance with the guidance set out within the Roger Tym and Partners / Jonathan Blackwell & Associates background study on the Retail Planning Guidelines, Categories 1 and 2 are classified as convenience goods expenditure. Categories 3-7 are classified as comparison expenditure for the purposes of this study. In relation to expenditure on internet an adjustment for existing levels of internet sales has already been made to the Annual Services Inquiry expenditure per capita figures in the omission of the category of “retail sales not in stores, stalls or markets”. This category includes internet shopping by retail stores that have a physical presence in Ireland.

Based on the 2016 Annual Service Inquiry we have estimated that the total expenditure per capita in 2016 in convenience shops was €3,558.

6.4 GROWTH RATES ASSUMED FOR EXPENDITURE PER CAPITA

In considering growth rates for expenditure per capita we have had regard to the recent trends observed from the Retail Sales Index. The latest CSO Retail Sales Index figures are from March 2022.

Compared with February 2020 (28 months earlier and pre-COVID-19), the volume of All Retail Sales in June 2022 was 2.4% higher. The highest increases were seen in Pharmaceuticals, Medical & Cosmetic Articles (+25.4%), Clothing & Footwear (+22.8%), Hardware, Paints & Glass (+16.2%) and Department Stores (+13.6%). The largest decreases in the volume of sales in June 2022 when compared with February 2020 levels, were Bars (-24.0%), Books, Newspapers & Stationery (-19.8%), and Fuel (-10.9%)⁴. It is important to have regard to overall trends in retail expenditure as well as more recent patterns of retail development which have been subject to significant short term change due to impact of Covid related measures with disruption to various forms of retailing for varying periods during the pandemic.

However, for the purposes of this study more conservative growth rates have been assumed per annum for expenditure per capita. For convenience goods a conservative growth rate of 1% per annum is assumed up to 2022. This growth rate is conservative in terms of recent growth rates observed from the Retail Sales Index. It should be noted that all figures are in 2022 price year to ensure the effect of inflation is discounted. The growth rate applied are volume rates rather than 'value' growth rates therefore a conservative approach is applied.

Table 6.2 – Expenditure per Capita

Expenditure per capita	Convenience
2016	€3,558
2022	€3,739
2028	€3,970

Source: Assumptions from Annual Services Inquiry 2016: 1% growth per annum assumed for convenience between 2016-2028.

6.5 TOTAL AVAILABLE EXPENDITURE WITHIN CATCHMENT AREA

The total available convenience expenditure in, 2016, 2022 and 2028 attributed to residents in the catchment area is obtained by multiplying the population by convenience expenditure per capita for that year.

Table 6.3 – Total Available Convenience Expenditure

	Convenience Spend
2022	€39,012,726
2028	€43,971,720

It is noted the proposed development includes 578 no. dwellings which could result in an additional population of 1,156 persons which could generate c. €4,543,364 in additional convenience expenditure in its own right. However this figure has not been added to the figures set out in the assessment.

6.6 TURNOVER OF PROPOSED DEVELOPMENT

This RIS will examine the proposed supermarket (neighbourhood anchor store) which comprises c. 2,476 sq. m (c. 1,765 sq. m net sales). The remainder of the retail/retail related

⁴<https://www.cso.ie/en/releasesandpublications/ep/prsi/retailsalesindexjune2022provisionalandmay2022final/>

services units which comprise c. 564 sq. m. For the purposes of the assessment 200 sq. m of this floorspace is included in the assessment, and the remainder of the floorspace is excluded for the purposes of the RIS as the ultimate operator may comprise retail services or commercial floorspace, which is not required to be assessed in respect of a RIS.

Table 6.4 – Turnover of Proposed Development

Year	Proposed Floorspace (sq.m. net sales)	T/O per sq.m. of proposed floorspace	Turnover of Proposal
2028	1,765	€12,000*	€21,180,000
2028	200	€8,500	€1,700,000
2028	-	-	€22,880,000

*Sales Density as per GDA Retail Guidelines 2008. Smaller unit assumed to have a lower efficiency and sales density.

6.7 IMPACT OF THE PROPOSED DEVELOPMENT

In Table 6.5, the turnover of the proposed development is compared with the available expenditure on convenience goods in the catchment area in 2028.

Table 6.5 – Total Retail Impact of Proposed Development

Year	Available Convenience Expenditure	Turnover of Proposed Development	Proposed Store as a Percentage of Total Convenience Expenditure Turnover
2028	€43,971,720	€22,880,000	52%

Source: Tables 6.3 and 6.4 of this RIS

6.8 EXISTING FLOORSPACE WITHIN THE CATCHMENT AREA

A review of the existing retail profile of the catchment area is undertaken within Section 5 of this RIS. The assessment identifies that there is currently no neighbourhood scaled shop (1,000-2,500 sq. m net) operating in the catchment area with a number of small scale convenience shops comprising 'Tesco Express' (Tyrconnell Road), 'Eurospar' (Inchicore), as well as other smaller local needs convenience shops which include 'Mini-market (Polish Shop, Tyrconnell Road), 'Savers Big Brands For Less' Emmet Road, 'Applegreen' (Tyrconnell Road), 'Spar' (Drimnagh) and 'Dublin Food Co-op' (Kilmainham).

It is noted an ALDI is located 1.9km to the West of the subject lands and Dunnes Stores is located 1.4km to the southeast, both outside the retail catchment of the proposed development.

The following is a breakdown of the existing convenience floorspace in the catchment area.

Table 6.6 – Estimated Existing Floorspace within the Catchment Area

Floorspace	Convenience
Inchicore	750 sq. m.
Drimnagh Galtymore Road	80 sq. m
Kilmainham	100 sq. m
Total	930 sq. m

Source: John Spain Associates survey August 2022

6.9 TURNOVER OF EXISTING FLOORSPACE

It is clear that the existing convenience floorspace within the catchment area is defined by a mix of smaller local neighbourhood shops within Inchicore. The local shops within the

catchment area serve a top-up function and would not yield the higher turnover rates as experienced by larger supermarkets. In order to reflect this, it is considered appropriate to apply an average sales density of €8,500 per sq.m. to all existing convenience floorspace within the catchment area.

Data available for the turnover of retailers in Ireland is limited and it is necessary to use estimate average figures. The figures are based on published retail industry data and have regard to the average turnover per sq.m. calculations established in Annual Reports and Retail Rankings. They reflect the average turnover levels retailers will require to sustain a healthy level of activity. They do not count in the high levels of overtrading that have existed in many areas in recent years. The turnover of existing convenience floorspace within the catchment area is therefore calculated in Table 6.7 below:

Table 6.7 – Turnover of Existing Retail Floorspace within the Catchment Area

	Convenience Est. Net sales sq.m.	Turnover per sq.m.	Total Turnover
Total Floorspace	930 sq. m	€8,500	€7,905,000

6.10 CAPACITY FOR ADDITIONAL NET CONVENIENCE FLOORSPACE

The capacity for additional convenience floorspace is obtained by subtracting the total turnover of existing convenience floorspace within the catchment area from available convenience expenditure. The capacity for additional convenience floorspace within the catchment area is set out in Table 6.8 below.

Table 6.8 – Capacity for Additional Net Convenience Floorspace

Year	Available Expenditure	Turnover of Existing Convenience Floorspace	Available Surplus
2028	€43,971,720	€7,905,000	€36,066,720

Source: Tables 6.3 & 6.7 of this RIS

It is estimated that there will be an available surplus of c€36,066,720 in the year 2028 when existing retail floorspace within the catchment area is taken into consideration. The turnover of the proposed store (and additional retail unit) is estimated at €22,880,000 in 2028. Therefore, even when the proposed supermarket is open and operating there would still be a surplus of expenditure of €13,186,720 – see Table 6.9 below.

Table 6.9 – Capacity for Additional Net Convenience Floorspace

Year	Available Surplus	Turnover of Proposed Supermarket & Retail unit	Available Surplus
2028	€36,066,720	€22,880,000	€13,186,720

Source: Tables 6.4 & 6.6 of this RIS

6.11 CONCLUSIONS

Therefore, it is concluded that there is more than adequate capacity in 2028 for the proposed development and this is assuming a closely defined catchment area to serve the proposed development. The available surplus for additional convenience retail floorspace is high which demonstrates the need to enhance the scale and quality of convenience retail floorspace within the catchment of Inchicore.

The proposed development will not have an adverse impact of any significance on the existing retail provision in the catchment area. There would still be significant expenditure available to help support existing retail providers in the immediate area of Inchicore.

No significant unimplemented current planning permissions for convenience floorspace were identified within the catchment area.

The proposed development is therefore fully in accordance with the Retail Planning Guidelines 2012 as it is demonstrated that the proposal will not impact on the viability of other centres outside the catchment and rather will serve the needs of the residents in the immediate vicinity of the site.

As illustrated above, there is more than sufficient capacity within the catchment area to accommodate the scale of retail floorspace proposed within the subject application on the basis of conservative population growth rates. The analysis demonstrates that the quantum of retail floorspace therefore proposed within the subject application seeks to cater for the short-term retail needs of the catchment area. It will help meet the significant deficit of retail facilities in the catchment area.

7.0 COMPLIANCE WITH PARAGRAPH 4.9 OF THE RETAIL PLANNING GUIDELINES 2012

The Retail Planning Guidelines 2012 set out in paragraph 4.9, a list of criteria, which retail developments should meet. The proposed development is examined within the context of the criteria set out within the Retail Planning Guidelines 2012 as follows.

The Retail Planning Guidelines state:

“In making a planning application for retail development which local authorities consider to be large scale in relation to existing town centres, the onus is on the applicant to demonstrate compliance with the development plan and that there will not be a material adverse impact on the vitality and viability of any existing town centre. In submitting evidence in relation to retail impact the applicant shall address the following criteria and demonstrate whether the proposal would:

We set out the planning rationale for the proposal in the context of these specific criteria.

“Will it support the long-term strategy for town centres as established in the Development Plan and not materially diminish the prospect of attracting investments to one or more such centres?”

The scale of the quantum of the retail element of the proposed development is in accordance with the Retail Strategy as set out in Appendix 2 of the Draft Dublin City Development Plan. Inchicore is designated as a Level 4 centre in the retail hierarchy for Dublin City. The proposed development is fully in accordance with the objectives of the Dublin City Development Plan 2016-2022, the Draft Dublin City Development Plan 2022-2028, and the non-statutory Kilmainham-Inchicore Development Strategy 2021.

The proposed development will provide a local/weekly convenience neighbourhood shop at a scale which is in accordance with the Retail Strategy for Dublin City.

The proposed development is in accordance with the sequential approach is considered to be an “*edge of centre*” site. Appendix 1 of this RIS provides more detail in respect of other sites reviewed. The site is located adjacent to the Urban Village of Inchicore, within walking distance and easily accessible to the urban centre.

The Kilmainham-Inchicore Development Strategy 2021 sets out the goals of regeneration of the Inchicore retail centre adding to the prospect of attracting further investment to the area which notes that:

‘Investment in the public realm of Inchicore Village would also serve to enhance the visual appearance of the area, making it a more inviting place to live, work and visit, thereby improving vitality and creating a more attractive retail environment’

It is noted the Kilmainham-Inchicore Development Strategy recommends the delivery of projects on a planned and phased basis has the potential to promote connectivity and unlock lands that will deliver compact and sustainable growth.

The proposed development seeks to provide for a mixed-use scheme including 5 no. retail/retail related service units, 2 no. café/restaurants as well as community infrastructure such as a creche, public open space and a community hub/library. The proposed development will enhance the quality of the physical environment of Inchicore and will improve linkages to the existing Inchicore retail centre.

The proposed scheme will underpin and support retailing within Inchicore by providing a neighbourhood shop of c. 1,765 sq. m net.

The proposed development will enhance the quality of retail floorspace to be provided within the level 4 Urban Village at Inchicore. The quantitative analysis confirms that there is more than sufficient capacity/surplus in the catchment and the quantum of proposed net additional retail floorspace (1,765 sq. m) can be supported and there is a surplus of convenience spending even accounting for the existing and proposed convenience shops within the defined retail catchment.

“Have the potential to increase employment opportunities and promote economic regeneration”

The proposed residential and mixed-use development which includes commercial and community uses will promote economic regeneration within the SDRA 9 Emmet Road as per Draft City Plan 2022. According to the Draft City Plan 2022, the subject lands have a Land-Use Zoning Objective Z14. The objective of these Z14 lands is:

“To seek the social, economic, and physical development and/or regeneration of an area with mixed use, of which residential would be the predominant use

The proposed development includes a community hub/library of c. 2,810 sq.m, a supermarket c. 2,476 sq. m GFA (1,765 sq. m net) as well as 2 no. cafes 285 sq. m and 5 no. retail/retail related service units (564 sq. m) as well as a creche of 816 sq. m. The estimated employment that will be generated from the non-residential uses is c. 190 jobs. This is based on a number of information sources including the Homes & Communities Agency, Employment Density Guide (2015).

Therefore, the development has the potential to increase employment opportunities and promotes economic regeneration, in accordance with the Z14 land use zoning. This mixed-use development will have a spin off effect to the local economy as the increased number of residents will increase demands for cafes, restaurants etc., located elsewhere within the Inchicore area.

“Have the potential to increase competition within the area and thereby attract further customers to the area”

The proposed development will broaden the convenience retail offer within the Urban Village of Inchicore. The purpose of the proposed neighbourhood shop is to provide additional local shopping for the immediate retail catchment of the subject lands, which has a dearth of existing convenience shops, and is not intended to act as a generator of additional business outside the immediate retail catchment.

The proposed development will serve the existing residents of the area as well as the new community which will result from the residential element of the proposed development. The proposed development will create an active street frontage along Emmet Road and will promote and encourage the rejuvenation of the wider Neighbourhood Centre area (on the opposite side of Emmet Road) and the Urban Village area, located immediately to the west. The proposed development will reduce the need of residents (existing and proposed) to generate unsustainable travel patterns, to convenience shops located in the wider area (e.g., Ballyfermot and Crumlin).

“Will it cause an adverse impact on one or more town centres, either singly or cumulatively with recent developments or other outstanding planning permissions, sufficient to undermine the quality of the centre, including the public realm, or its wider function in the promotion and encouragement of the arts, culture, and leisure all critical to the economic and social life of the community?”

The proposed retail development comprises of 1,765 sq. m. of additional net retail convenience floorspace within the overall proposed development. The lands are located within the SDRA 9 Emmet Road (Z14 lands), as per Draft City Plan 2022, and the retail element of the proposed development is designed to meet the needs of the existing and future residents in the local catchment. The qualitative and quantitative sections of this assessment have concluded that there is more than sufficient capacity for this floorspace in addition to existing floorspace in the catchment area.

The proposed development will not have an impact on nearby retail centres outside of the catchment area. Existing Centres within the vicinity of the catchment area include the City Centre, Ballyfermot, and Crumlin.

“Will it link effectively with an existing town centre so that there is likely to be commercial synergy.”

The subject development proposal seeks to provide for a mixed-use scheme which is located at the edge of the Urban Village of Inchicore. The proposed development will complement the existing range of retail and retail services activities and will expand the existing retail base of Inchicore, thereby allowing Inchicore to provide an improved range of retail and non-retail services appropriate to its Level 4 status, in accordance with the Retail Hierarchy as set out in Appendix 2 (Retail Strategy) of the Draft City Development Plan 2022-2028.

The proposed development provides for a mix of retail/ retail/retail related service units, café/restaurants and community uses while creating strong linkages and connectivity with the remainder of the Inchicore Urban Village.

The proposal will enhance the retail offer for the local population and boost footfall to support other retail units along Emmet Road between the junction of Emmet Road/Tyrconnell road to the proposed development.

“Will it respond to the consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support?”

The proposed development will contribute towards enhancing the retail base of the Inchicore by providing a proportionate quantum of retail floorspace within a modern retail format as part

of the regeneration of the subject lands, including the significant improvements to the public realm within this location. The proposal will provide a neighbourhood shop of 1,765 sq. m (net) which currently does not exist within Inchicore. Furthermore the size of the proposed neighbourhood shop is within the 1,000-2,500 sq. m net, size range as set out in the Appendix 15 of the Draft City Development Plan (2022-2028)

In this regard, the proposed scheme will significantly contribute towards enhancing the retail offer of Inchicore in accordance with the provisions of the Retail Planning Guidelines and the Retail Strategy of the Draft Development Plan. The proposed cafes and configuration of retail/retail/retail related service units will enliven and sustain activity throughout the day and into the evening. It is not intended that the proposed development (as a neighbourhood anchor shop) would compete with existing centres within or outside the catchment area but rather enhance the retail offer of Inchicore for existing and future residents.

“Will it cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term?”

The proposed development seeks to provide 1,765 sq. m net retail floorspace, located at the edge of Inchicore Urban Village. The focus of the proposed development is to provide a mixed-use development including retail floorspace which will expand the retail core of Inchicore. The proposed development would enhance the position of Inchicore and would represent a considerable investment in the Neighbourhood Centre of Inchicore not only in the retail offer but also in the public infrastructure and associated improvements in the public realm.

The proposed development will contribute towards retaining the vitality and vibrancy of Inchicore and its attractiveness as a Neighbourhood Centre. The development of these lands will increase footfall along Emmet Road and ensure viability of retail units along this street.

In this regard, it is not anticipated that there should be any increase in the number of vacant properties within Inchicore arising because of the proposed development due to the nature of the retail units proposed. On the contrary, it is expected that the proposed development will provide a much-needed expansion of the retail base within Inchicore in accordance with the policy and objectives set out within the current Dublin City Development Plan 2016-2022 and Draft City Plan 2022-2028.

Given the levels of available expenditure growth and the limited scale of the proposed development it is considered that the proposed development will not cause an increase in the number of vacant properties within the study area or any district centre outside the catchment area. Rather it will help provide a more balanced and sustainable pattern of local retail provision which will benefit existing and future residents.

“Will it ensure high standards of access both for public transport, foot, and private car so that the proposal is easily accessible by all sections of society?”

Inchicore is well served by public transport. The site is highly accessible by public transport, bus, and Luas. Within a 500m distance from the subject lands there are a multitude of bus routes which serve all areas of the city and suburbs. These bus routes include, 13, 40, 51D, 52, 68, 68A, 69, 79, 79A and 123. The proposal includes undercroft car parking which will cater for less mobile persons. Furthermore, the proposed neighbourhood shop is highly accessible by foot and bicycle to the immediate local population of Inchicore and its catchment.

The Red Luas line is within proximity to the subject site and is served by both the Goldenbridge and Drimnagh stops which provides direct access to the city centre and Tallaght.

Having regard to the above it is submitted that the proposed development is fully in accordance with Paragraph 4.9 of the Retail Planning Guidelines.

8.0 CONCLUSIONS

The scale of the quantum of the retail element of the proposed development is in accordance with the Retail Strategy as set out in Appendix 2 of the Draft Dublin City Development Plan (2022-2028). Inchicore is designated as a Level 4 centre in the retail hierarchy for Dublin City. The proposed development is fully in accordance with the objectives of the Dublin City Development Plan 2016-2022, the Draft Dublin City Development Plan 2022-2028, and the non-statutory Kilmainham-Inchicore Development Strategy 2021.

The proposal will provide a neighbourhood shop of 1,765 sq. m (net) which currently does not exist within Inchicore. Furthermore the size of the proposed neighbourhood shop is within the 1,000-2,500 sq. m net, size range as set out in the Appendix 15 of the Draft City Plan

The proposal will greatly enhance the Emmet Road streetscape and local/neighbourhood centre.

The qualitative and quantitative assessments provided herein indicate that there is proven demand for new convenience retail floor space within the Inchicore area which the proposed development will directly respond to and there is a surplus of convenience spending even accounting for the existing and proposed convenience shops within the defined retail catchment.

The proposed mixed-use development comprising residential, retail/retail services and community uses will promote economic regeneration within the SDRA 9 Emmet Road.

Having regard to the above, it is submitted that the proposal is a plan led development and fully in accordance with the proper planning and sustainable development of the area.

APPENDIX 1 – SEQUENTIAL TEST

Sequential Test

The order of priority for the sequential approach is to locate retail development in the city/town centre (and district centre if appropriate), and only to allow retail development in edge of centre or out of centre locations where all other options have been exhausted.

The sequential approach to the location of the retail development is where the location of a proposed retail development submitted on a planning application has demonstrated to the satisfaction of the planning authority that it complies with the policies and objectives of a development plan and/or relevant retail strategy to support city and town centre, additional supporting background studies such as a demonstration of compliance with the sequential approach, below, or additional retail impact studies are not required.

Policy in relation to the location of retail development is set out in paragraphs 58 to 63 on page 15/16 of the Retail Planning Guidelines 2012. It sets out what is known as the sequential test.

The preferred location of new retail development where practicable and viable is within a town centre (or district or major village centre). Where it is not possible to provide the form and scale of development that is required on a site within the town centre, then consideration can be given to a site on the edge of the town centre to encourage the possibility of one journey serving several purposes. An edge of centre site, for the purposes of these guidelines, is taken to be one which is within an easy and convenient walking distance from the primary core of a town centre. The distance considered to be convenient will vary according to local circumstances but typically is unlikely to be much more than 300 – 400 metres from the edge of the prime shopping area, and less in smaller settlements.

Having assessed the size, availability, accessibility, and feasibility of developing both sites and premises, firstly within a town centre and secondly on the edge of a town centre, alternative out of centre sites should be considered only where it can be demonstrated that there are no town centre or edge of centre sites which are suitable, viable and available. This is commonly known as the sequential approach to the location of retail development.

In adopting the sequential approach in formulating development plans, planning authorities must liaise with retailers, landowners, and developers to ensure that development plan proposals are practicable and reasonable. Unless the development plan has some prospect of being implemented it will not assist in sustaining and enhancing town centres. Sites suggested for development should therefore be capable of being accessed and serviced. They should be viable for the proposed use and likely to become available within a reasonable period.

Equally when making a planning application the private sector must be adaptable and flexible in appraising potential sites and buildings and should liaise with the planning authority before submitting assessment of site or building suitability. Retailers should be prepared to make reasonable compromises and, if possible, adapt standard development formats to accommodate retail schemes on sites which are well located in relation to the sequential approach to retail development.

A particular issue that will arise in the appraisal of alternative locations is the potential contrasting performance in terms of urban design, accessibility, and traffic congestion. Each case will have to be treated on its merits and a balance struck between a site's relative performance against the various planning and transportation factors to be evaluated. In relation to urban design, applicants should make every effort to integrate successfully new retail development, much of which will be of a larger scale than the existing urban grain, into the townscape of existing centres. Attention should be given to the location of service yards

and treatment of car parking areas to avoid unsightly views and special consideration should be given to the detailing of extensive frontages and flank walls.

It is likely that some retail development will take place in out of centre locations. Not all centres, particularly small and historic towns, will have sites that are suitable in terms of size, parking, traffic generation or servicing arrangements for large scale development in the town centre itself. In such centres, development should be of a scale appropriate to the size of the centre to minimize the potential for adverse impact. In preparing development plans, county councils should specify criteria against which the merits of out of centre retail applications can be judged. These criteria should cover matters such as the broad need (floorspace requirement) for additional retail development to serve an identified local community, size development, quality of design and layout, effect on the nearby environment, effect on vitality and viability, servicing, accessibility by a variety of travel modes and car parking. Developers when submitting planning applications should formulate their proposals within the framework of the specified criteria. It is not appropriate for applications on out of centre sites to be pursued when there is quite clearly no need for the scale of development proposed.

It is a clear objective of the sequential test to identify available suitable sites which have the capacity to accommodate a retail development. The site should be capable of providing adequate car parking, pedestrians and vehicles should have ease of access and the development should not impact upon traffic in the catchment area.

Criteria for Assessment of Sites

Compatibility of Existing Building/Land Use: The existing building or land use of each sequential test site is assessed in terms of its suitability for a discount food store. In this regard, the size and internal layout of existing buildings and the similarity of the existing land use will be considered

Zoning: It should be noted that each site should also be assessed in relation to its current zoning as set out in the relevant Development Plan.

Urban Context: It is essential that the surrounding area is assessed and the ability to integrate a convenience store into the existing urban form is examined.

Site Area: The site must be of sufficient size to cater for the proposed development of a neighbourhood supermarket and associated car parking.

Accessibility & Traffic Safety: Each site shall be assessed in relation to its accessibility for pedestrians and vehicular traffic. The effect of the proposed development on the existing traffic is also assessed.

A total of seven alternative sites (Figure 9.1) have been examined as potential locations for a retail/residential development but have been proved to be unsuitable. Each site was assessed using the criteria as stated above.

We have concluded in this assessment that there are no alternative town centre or edge of centre sites available within Inchicore to accommodate the proposed development.



Figure 1: Location of Possible Development Sites

Site 1: 205 Emmet Rd, Inchicore, Dublin 8

Site Description: The site is a brown field site at the centre of Inchicore retail hub. It is located behind a row of shops on Grattan Crescent and backs on to Grattan Crescent Park. It is not currently being used. It has vehicle access from Emmet Road.

Zoning: The site has 2 no zoning objectives and is zoned ‘Z4’ District Centres, its objective is to ‘provide for and improve neighbourhood facilities’. In addition, a small part of the site is zoned Z9 “Amenity/Open Space lands / Green Network. The northern part of the site is located within a Conservation Area.

Figures 2 and 3 below show the zoning maps under the current plan and the draft development plan. Site 1 has had no zoning change in the draft plan. The draft plan notes that Z4 lands are to be referred as Urban Villages/Urban Villages.

Tables 1, 2, 3 and 4 below illustrates the permissible and open for consideration uses for Z4 and Z9 under the current and draft plans. A neighbourhood shop is a permissible use for Z4 lands under both plans.

Table 1: Z4 Permissible and Open for Consideration Uses (2016-2022 plan)

Z4 Permissible Uses
Amusement/leisure complex, bed and breakfast, betting office, buildings for the health, safety and welfare of the public; car park, car trading, childcare facility, civic offices, community facility, cultural/ recreational building and uses, delicatessen1, education, embassy office, enterprise centre, garden centre, guest house, halting site, home-based economic activity, hostel, hotel, industry (light), live work units, media-associated uses, medical and related consultants, motor sales showroom, office (max. 600 sq. m.), off-licence, open space, park and ride facility, part off-licence, petrol station, place of public worship, public house, residential, restaurant, science and technology-based industry, shop (district), shop (neighbourhood) , take-away, training centre
Z4 Open for Consideration Uses
Advertisement and advertising structures, civic and amenity/recycling centre, conference centre, embassy residential, factory shop, financial institution, funeral home, garage (motor repair/ service), household fuel depot, internet café, nightclub, office (max. 1200 sq. m) outdoor poster advertising, shop (major comparison), warehousing (retail/non-food)/retail park.

Table 2: Z4 Permissible and Open for Consideration Uses (2022-2028 plan)

Z4 Permissible Uses
Amusement/leisure complex, assisted living/retirement home, bed and breakfast, buildings for the health, safety and welfare of the public, café/ tearoom, car park, car trading, childcare facility, civic offices, community facility, cultural/recreational building and uses, craft centre/ craft shop, delicatessen, education, embassy office, enterprise centre, financial institution, garden centre/ plant nursery, guesthouse, halting site, homebased economic activity, hostel (tourist), hotel, industry (light), live-work units, media-associated uses, medical and related consultants, mobility hub, motor sales showroom, office, off-licence, off-licence (part), open space, park and ride facility, petrol station, place of public worship, primary health care centre, public house, public service installation, recycling facility, residential, restaurant, science and technology-based industry, shop (district), shop (local), shop (neighbourhood) , sports facility, take-away, training centre, veterinary surgery
Z4 Open for Consideration Uses
Advertisement and advertising structures, betting office, Build to Rent residential, civic and amenity/recycling centre, conference centre, embassy residential, funeral home, garage (motor repair/service), household fuel depot, internet café/call centre, laundromat, nightclub, office, outdoor poster advertising, postal hotel/motel, shop (factory shop), shop (major comparison), student accommodation, warehousing (retail/non-food)/retail park.

Table 3: Z9 Permissible and Open for Consideration Uses (2016-2022 plan)

Z9 Permissible Uses
Allotments, cemetery, club house and associated facilities, municipal golf course, open space, public service installation.
Z9 Open for Consideration Uses
Boarding kennel, café/ tearoom, caravan park/camp site (holiday), car park for recreational purposes, childcare facility, civic and amenity/ recycling centre, community facility, club house and associated sports facilities, craft centre/craft shop, crematorium, cultural/recreational building and uses, garden centre/ plant nursery, golf course and clubhouse, place of public worship, restaurant, shop (local), sports facility, water-based recreational activities.

Table 4: Z9 Permissible and Open for Consideration Uses (2022-2028 plan)

Z9 Permissible Uses
Cemetery, club house and associated facilities, municipal golf course, open space (see Appendix 21 land use definitions), public service installation which would not be detrimental to the amenity of Z9 zoned lands.
Z9 Open for Consideration Uses
Car park for recreational purposes, caravan park/ camp site (holiday), community facility, craft centre/ craft shop, crèche, cultural/recreational building and uses, golf course and clubhouse, kiosk, neighbourhood retail (in accordance with highly exceptional circumstances above), tea room, café/restaurant.

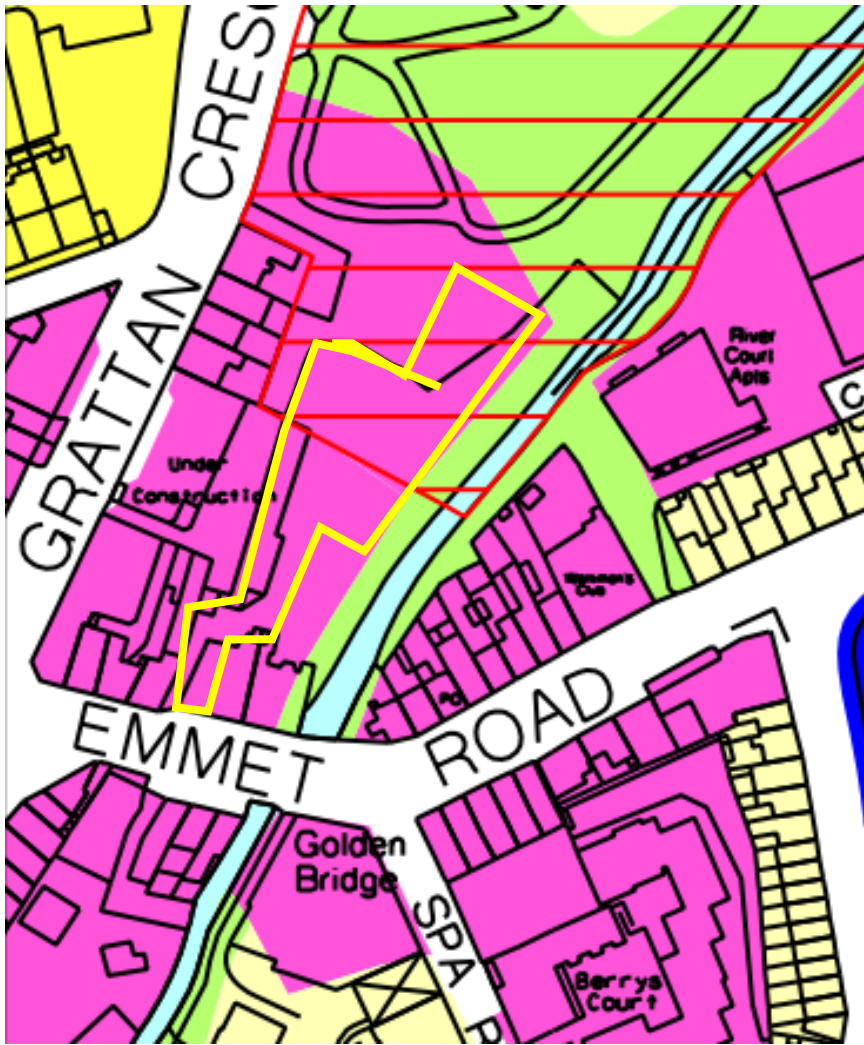


Figure 2: Site 1 zoning (Dublin City Development Plan 2016 - 2022)

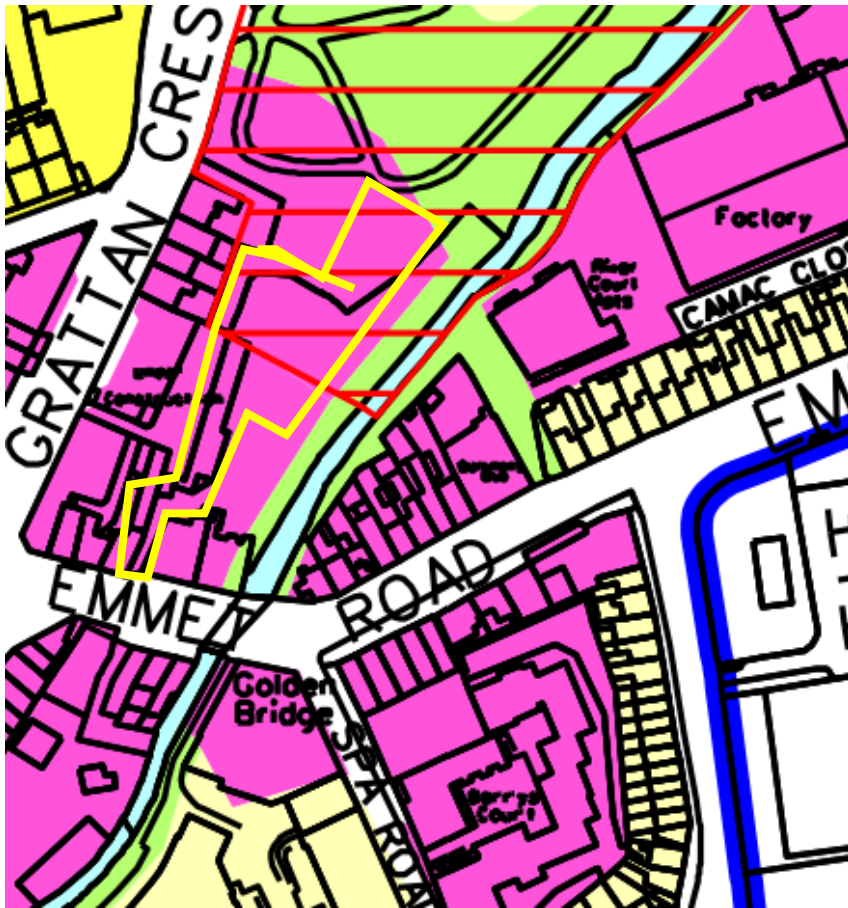


Figure 3: Site 1 zoning (Draft Dublin City Development Plan 2022-2028)



Figure 4: Site 1 aerial image

Issues: The site, is too small and narrow in configuration to accommodate a retail development and its associated car parking and service areas.

Availability: Planning permission was granted for the site on the 20th of June 2019 for amendments to ‘the previous approved 4-storey apartment development in the back lands for the increase in height to six storey building above semi-basement level consisting of: 6 no. one-bed, 18 no. two-bed apartments, which include balconies to the north, west & south elevations, additional covered bike storage areas, refuse store, with revised 18 no. car parking spaces off vehicular access road from Emmet Road, with associated landscaping & site works.’

Accessibility: The site is located within Inchicore’s retail centre along Emmet Road. There is pre-existing road access to this site however this access is extremely narrow and limited to one way traffic, this could cause issues throughout the development. It is considered that the provision of access into a retail development on the site has the potential to impact on traffic given the location of the site access (and associated constraints). It is considered that a stand alone residential unit would be more appropriate for the site. The site has limited access via Camac Close and will give rise to HGV deliveries to this site location.

Suitability: This site enjoys a prominent position in the town situated on Emmet Road within walking distance of the town centre. It is therefore considered an appropriate location for the development of higher density town centre uses. However, the site is considered too small and narrow in configuration to accommodate the convenience retail unit and therefore is considered unsuitable for the proposed development.

Feasibility: It is considered that the site is too restricted in terms of size and shape to accommodate the scale of development proposed and would likely give rise to potential traffic safety issues associated with access/egress from the development for customer and service vehicles.

Conclusion: Although the site may be available for development, and appropriately zoned, it is of insufficient size and shape to accommodate the proposed development retail development and associated car parking. The site is also located at a busy junction of Emmet Road and Grattan Crescent which would raise concerns over traffic safety and the movement of traffic on a main arterial route through the town. The entrance is narrow and would be insufficient for HGV deliveries to access the site. For these reasons, this site is not considered suitable or viable for the development.

Site 2: M O’Byrne Hire Site - Emmet Rd, Inchicore, Dublin 8,

Site Description: The site is located to the rear of Camac Close and is occupied by M. O’Byrne Hire and National Autoparts within a commercial building. It has vehicle access from Emmet Road via Camac Close.

Zoning: The site is zoned ‘Z4’ District Centres, its objective is to ‘provide for and improve neighbourhood facilities’.

Figures 5 and 6 below show the zoning maps under the current plan and the draft development plan. Site 2 has had no zoning change in the draft plan.

Tables 5 and 6 below shows the permissible and open for consideration uses for Z4 and Z9 under the current and draft plans. A neighbourhood shop is a permissible use for Z4 lands under both plans.

A shop (neighbourhood) is permissible under the Z4 land use zoning objective in both the current and draft plans.

Table 5: Z4 Permissible and Open for Consideration Uses (2016-2022 plan)

Z4 Permissible Uses
Amusement/leisure complex, bed and breakfast, betting office, buildings for the health, safety and welfare of the public; car park, car trading, childcare facility, civic offices, community facility, cultural/ recreational building and uses, delicatessen ¹ , education, embassy office, enterprise centre, garden centre, guest house, halting site, home-based economic activity, hostel, hotel, industry (light), live work units, media-associated uses, medical and related consultants, motor sales showroom, office (max. 600 sq. m.), off-licence, open space, park and ride facility, part off-licence, petrol station, place of public worship, public house, residential, restaurant, science and technology-based industry, shop (district), shop (neighbourhood) , take-away, training centre
Z4 Open for Consideration Uses
Advertisement and advertising structures, civic and amenity/recycling centre, conference centre, embassy residential, factory shop, financial institution, funeral home, garage (motor repair/ service), household fuel depot, internet café, nightclub, office (max. 1200 sq. m) outdoor poster advertising, shop (major comparison), warehousing (retail/non-food)/retail park.

Table 6: Z4 Permissible and Open for Consideration Uses (2022-2028 plan)

Z4 Permissible Uses
Amusement/leisure complex, assisted living/retirement home, bed and breakfast, buildings for the health, safety and welfare of the public, café/ tearoom, car park, car trading, childcare facility, civic offices, community facility, cultural/recreational building and uses, craft centre/ craft shop, delicatessen, education, embassy office, enterprise centre, financial institution, garden centre/ plant nursery, guesthouse, halting site, homebased economic activity, hostel (tourist), hotel, industry (light), live-work units, media-associated uses, medical and related consultants, mobility hub, motor sales showroom, office, off-licence, off-licence (part), open space, park and ride facility, petrol station, place of public worship, primary health care centre, public house, public service installation, recycling facility, residential, restaurant, science and technology-based industry, shop (district), shop (local), shop (neighbourhood) , sports facility, take-away, training centre, veterinary surgery
Z4 Open for Consideration Uses
Advertisement and advertising structures, betting office, Build to Rent residential, civic and amenity/recycling centre, conference centre, embassy residential, funeral home, garage (motor repair/service), household fuel depot, internet café/call centre, laundromat, nightclub, office, outdoor poster advertising, postal hotel/motel, shop (factory shop), shop (major comparison), student accommodation, warehousing (retail/non-food)/retail park.

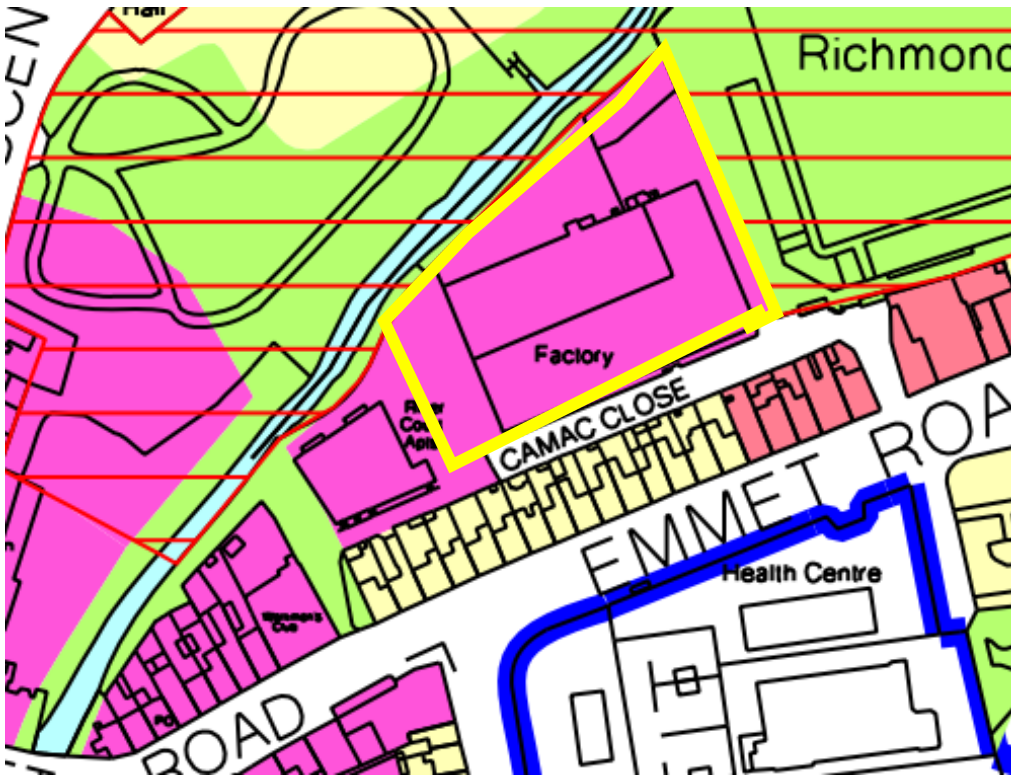


Figure 5: Site 2 zoning (Dublin City Development Plan 2016 - 2022)

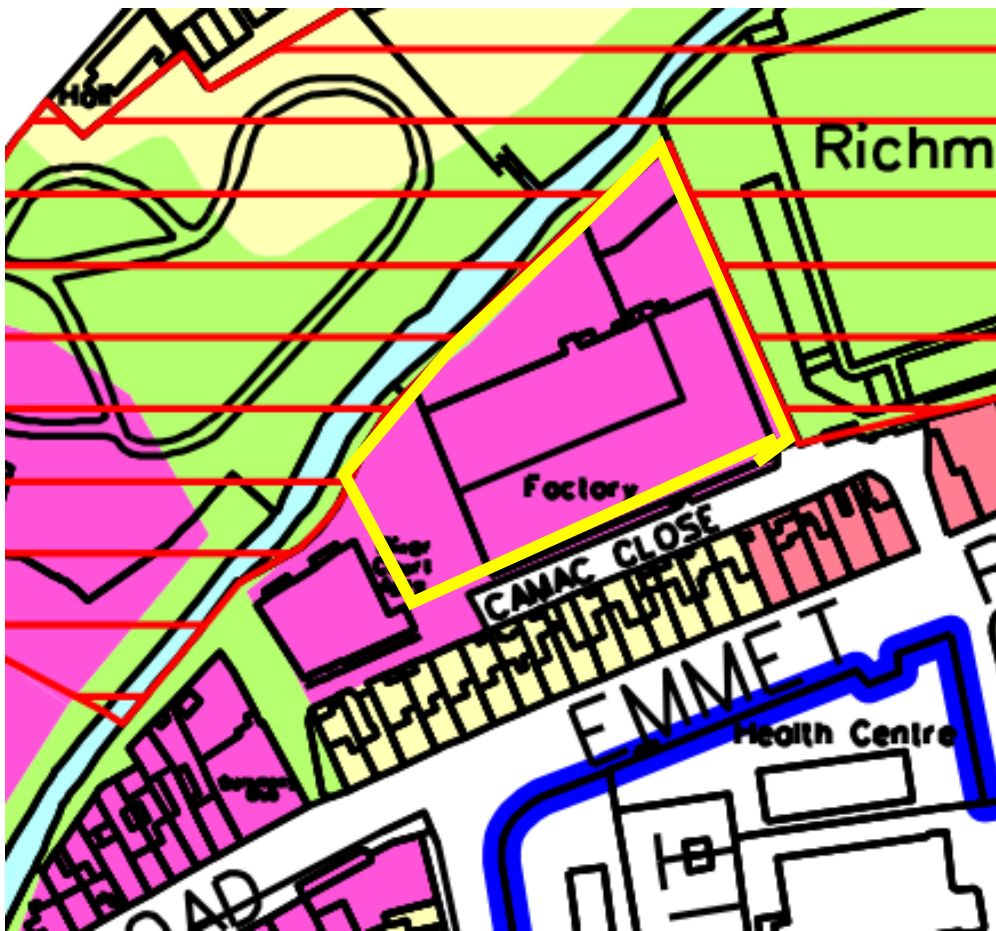


Figure 6: Site 2 zoning (Draft Dublin City Development Plan 2022-2028)



Figure 7: Site 2 aerial image

Issues: It would be difficult to accommodate a retail development and its associated car parking and service areas on the subject. It is noted that the site is bounded by the Camac River along its northern boundary.

Availability: The site is currently occupied by M O'Byrne Hire and National Autoparts. It does not appear to be available for redevelopment.

Accessibility: The site is located within Inchicore's Z4 zoning along Emmet Road. There is pre-existing road access to this site from Camac Close (2 no. access points). The site has limited access via Camac Close and does not appear to have suitable HGV delivery access to this site location.

Suitability: This site has a back land position located to the rear of existing residential area. It is therefore not considered an appropriate location for a neighbourhood shop.

Feasibility: It is considered that the site has the potential to accommodate a neighbourhood shop unit. However, it is located adjacent to the rear of a number of properties, which has the potential to give rise to amenity and access issues.

Conclusion: Although the site may appropriately zoned it does not appear to be available for the development of a neighbourhood shop. As previously noted, the site is not suitable for HGV access.

Overall Conclusion on the Sequential Test

Having regard to the above, it is considered that the subject site is from a sequential perspective, suitable, viable and available to accommodate the neighbourhood shop and therefore the proposed development is in compliance with the sequential test as both of the other sites are not suitable for the proposed development of a shop of a similar scale.

Appendix 2 – Small Electoral Areas**Small Area Catchment Population**

Number SSA	2011	2016
A268051003	301	310
A268051006	236	234
A268051007	316	343
A268051008	258	267
A268051009	141	144
A268051010	321	339
A268051011	185	199
A268051013	248	236
A268051014	173	180
A268052004	264	255
A268052007	259	217
A268052008	253	243
A268078003	193	194
A268078004	130	176
A268078005	191	172
A268078006	255	303
A268078007	191	194
A268078008	153	151
A268078009	116	121
A268078010	178	183
A268078011	151	184
A268078012	157	176
A268084002	209	226
A268084006	137	153
A268085001	287	240
A268085002	189	200
A268085003	185	180
A268085004	176	211
A268085005	167	179
A268085006	165	177
A268085007	219	280
A268085008	184	158
A268085009	252	257
A268085010/01	124	102
A268085010/02	409	499
A268085011	289	292
A268085012	213	286
A268085013	202	231
A268085014	266	270
A268085015	182	182
A268085016	295	298
A268085017	244	259

A268085018	310	328
Total	9,374	9,829