



Retail Impact Statement

In respect of

**In respect of a Part 10 (s.175) Planning Application for a
Proposed Mixed-use Residential Development located on
lands at Cherry Orchard, Dublin 10**

On behalf of

The Land Development Agency

November 2023

Document review and approval

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Table of Contents

1.0	Introduction	1
1.1	Purpose of the Report	1
2.0	Site Context	3
2.1	Site Location	3
2.2	Site Description	4
2.3	Proposed Development	4
3.0	Planning Policy Context	8
3.1	National Policy Context	8
3.2	Regional Policy Context	10
3.3	Local Policy Context	12
3.4	Conclusion	18
4.0	Local Retail Context	19
4.1	Liffey Valley Town Centre	20
4.2	Naas Road Key Urban Village	20
4.3	Ballyfermot Key Urban Village	21
4.4	Clondalkin Town Centre	21
4.5	Palmerstown Village	22
4.6	Palmerstown Shopping Centre	23
4.7	Rowlagh Village	23
4.8	Other Retailers	24
5.0	Quantitative Analysis	25
5.1	Method	25
5.2	Identification of Study Area	25
5.3	Assessment Timeframe	26
5.4	Population and Retail Expenditure in the Study Area	26
5.5	Turnover of Proposed Development	27
5.6	Turnover of Existing Retail Stores in the Study Area	28
5.7	Trade Diversion and Impact	29
5.8	Retail Spend Generated by the Proposed Development	30
5.9	Conclusion	31
6.0	Qualitative Analysis	32
6.1	Method	32
6.2	Assessment of Proposed Development	32
7.0	Summary and Conclusion	35

1.0 Introduction

KPMG Future Analytics (KPMG FA) of 1 Stokes Place, St Stephen's Green, Dublin 2 (Chartered Town Planning and Development Consultants) have been instructed by The Land Development Agency (LDA), 2nd Floor Ashford House, Tara St, Dublin 2 to prepare this Retail Impact Statement (RIS) to accompany the application for a proposed development on a site of 6.27 hectares, located on lands at Cherry Orchard, Dublin 10 (known as Development Site 4 in the Park West Cherry Orchard Local Area Plan 2019).

1.1 Purpose of the Report

This RIS analyses the Proposed Development against all relevant retail planning policies contained in local, regional, and national-level policy documents. This RIS has been prepared in accordance with the Retail Planning Guidelines for Planning Authorities (2012) ('RPGs').

In line with the requirements of the RPGs, an assessment of the retail impact of the proposal is not strictly required for the Proposed Development given its location within a proposed neighbourhood centre and the quantum of retail floorspace proposed. Notwithstanding the GRPGs, Appendix 2 'Retail Strategy', of the Dublin City Development Plan 2022 – 2028 at section 9.1 it provides:

"Development proposals for significant retail development must be supported by a full Retail Impact Assessment. In general, significant retail development means 2,000 sq.m.+ net comparison floorspace and 1,500 sq.m. + net convenience floorspace, located outside the city centre retail core and Key Urban Villages."

Based on Table 2-1 in this report, the size/floorspace of the proposed retail unit falls within this requirement. Accordingly, an RIS determining the retail impact of the proposed development has been undertaken to demonstrate how the development satisfies all relevant policies and will make a positive impact to local retail environment.

This RIS is structured upon the following sections:

- Section 2 introduces the existing site context and provides an overview of the proposed development focusing on proposed retail uses
- Section 3 provides an overview of planning policy relevant to the assessment of the retail impact of the proposed development
- Section 4 provides an overview of existing retail centres surrounding the Site
- Section 5 sets out a quantitative retail impact assessment of the proposed development
- Section 6 set out a qualitative impact assessment of the proposed development
- Section 7 concludes the RIS

This report assesses the retail element of the proposed development only, specifically convenience and comparison retail. Convenience retail goods are defined in the GRPGs at Annex 1 as food, alcoholic and non-alcoholic beverages, tobacco and non-durable household goods. Comparison retail goods are defined as clothing and footwear, furniture, furnishings

and household equipment, medical and pharmaceutical products, therapeutic appliances and equipment, educational and recreation equipment and accessories, books, newspapers and magazines, goods for personal care, goods not elsewhere classified and bulky goods. Elements of the proposal which relate to service, community or recreational uses are not assessed but the report does note their role in the overall offer of the new development.

A Design Year (Test Year) of 2029 has been assumed for the purpose of calculating the quantitative retail impact of the proposed development. This report assumes that the proposed development will open in 2027 which is consistent with assumptions made in the EIAR prepared as part of this planning application. A further 2 years has been allowed for shopping patterns to become established for the development by 2029.

2.0 Site Context

This Section introduces the existing site context and the proposed development with a focus on the proposed retail uses.

2.1 Site Location

The Subject Site is located on lands at Park West Avenue, Cherry Orchard, Dublin 10 and forms part of Site 4: M50-Cedarborok Avenue Site as identified in the Park West Cherry Orchard Local Area Plan 2019. The site is bound by Cloverhill Road to the north, Cedar Brook Avenue and Park West Avenue to the east, Park West Cherry Orchard Rail Station to the southeast, the rail line to the south, and the M50 motorway to the west. The site for the purposes of this application, represents part of Development Site 4 and will form the initial phase of the wider redevelopment of Development Sites 4 and 5.



Figure 2-1 Location of the Subject Site (red) and Key Development Sites 4 and 5 in the Cherry Orchard LAP (blue)

2.2 Site Description

The Subject Site (c. 6.27 hectares) is currently vacant and contains a large expanse of grassed lawn, mature trees and overgrown vegetation which form the western and northern boundary of the site. The lands are largely flat in nature rising sharply to the M50 along the western boundary falling towards the rail station. The lands are strategically positioned bounded by the M50 to the west and the Park West-Cherry Orchard rail station to the south which provides excellent accessibility and connectivity opportunities. The site also benefits from direct access via Cedar Brook Avenue which connects with Park West Avenue and is served by the No.60 and G1 bus routes providing direct linkages to Dublin City Centre and the Docklands. The surrounding area is mixed use in nature with two large industrial estates each to the southwest and southeast of the site, residential developments located further east, Cloverhill Prison to the north and a number of recreational and green spaces including Cherry Orchard Park.

The Subject Site is part of the wider area identified under the Dublin City Development Plan 2022-2028 for regeneration which is reflected in the lands' designation as a Strategic Development Regeneration Area (SDRA 4). The Park West Cherry Orchard Local Area Plan (hereafter 'the LAP') for the area was adopted in 2019 and identified 8 no. Key Development Sites within the wider LAP lands that offer the potential to deliver approximately 2,000 residential units in tandem with employment and commercial development. The subject site represents part of Development Site 4 and will form the first of four phases of development aimed at delivering upon the aspirations of the LAP for the redevelopment of these lands.

2.3 Proposed Development

The proposed development (GFA of c. 66,282sqm) involves the construction of a residential led mixed use scheme across 16 blocks contained within 9 buildings ranging in height from 4 to 15 storeys.

The proposed development principally involves the construction of a residential led mixed use scheme comprising 708no. residential apartments comprising 547no. cost rental and 161no. social / affordable units, a convenience retail supermarket, 7 no. independent retail / commercial units, dedicated internal and external community and arts / cultural spaces, a childcare facility with associated outdoor play area, landscaped public open space including community plaza, multipurpose amenity lawn, play space, outdoor fitness trail, multi-use games area (MUGA), playground and all associated site and development works.

The Planning Statement submitted alongside this planning application prepared by KPMG FA provides a comprehensive description of the proposed development.

The proposed development represents Phase 1 of the overall planned development for Development Sites 4 and 5 of the LAP lands. It is expected that Phases 2 and 3 could deliver an additional 407 residential units.

Proposed retail uses include a supermarket (2,523sq.m GFA) and 7no. small retail / commercial units (totalling 373sq.m GFA) which range from 41.4 sqm up to 75.5 sqm GFA. It is proposed that the retail / commercial units will be operated by a range of retail and retail service uses such as post office, café, restaurant, or laundrette. Many of the small units have

been designed to enable units to be joined or subdivided (subject to planning permission) to meet operators' requirements.



Figure 2-2 Proposed commercial centre including supermarket, small retail/commercial service units and retail car parking

New retail facilities are proposed to address the under provision of accessible neighbourhood retail uses in the Cherry Orchard Park West area as acknowledged in planning policy. There is currently no supermarket in Cherry Orchard and Park West. Currently, the only food shopping facilities in Cherry Orchard is a small Centra convenience food store and in Park West the Plaza Park West contains a small Spar convenience food store but they do not form part of a village and do not provide for supermarket shopping. The nearest supermarket is Lidl on New Nangor Road in Ballymanaggin which is a 5-minute drive or 35-minute walk from the Subject Site.

The proposed retail floorspace (including the supermarket) has been located beside the train station and fronting along Park West Avenue to provide improved sustainable access to convenience retail facilities for both existing and future communities of Cherry Orchard and Park West.

Park West Avenue is a busy transport hub for rail and bus transport links which will increase in footfall and activity on completion of the DART + upgrade to the railway line and the implementation of Bus Connects in Cherry Orchard. The positioning of the supermarket and small retail units aims to maximise opportunities for linked trips and reduce the reliance on private car journeys to access larger supermarkets which provide a greater range of goods.

The proposed retail development is intended to serve a local function; it will primarily serve existing and future communities of Cherry Orchard and Park West. The scale and format of the proposed retail development is consistent with this localised function as evidenced further in Section 5 of this report. The proposed development will improve consumer choice and competition in the local retail market by providing sustainable access to a greater range of retail goods and services for the communities in Cherry Orchard and Park West.

The proposed retail floorspace is detailed in Table 2-1. In this report it is assumed that each retail / commercial unit will be operated as a retail shop to test the reasonable worst-case scenario in the retail impact assessment (detailed in Sections 5 and 6). Informed assumptions need to be made about the split of comparison (i.e., non-food) and convenience (i.e., food) retail goods sold in the proposed supermarket and small retail / commercial units since operators have not yet been identified.

Table 2-1 Summary of Proposed Retail Floorspace

Unit	Total floor area sqm GFA	Total sales area sqm net	Convenience sales area sqm net	Comparison sales area sqm net	Ancillary (storage) sqm GFA
Supermarket	2,523.0	2,018.4	1,614.7	403.7	504.6
Retail Unit 1	60.0	48.0	38.4	9.6	12.0
Retail Unit 2	50.0	40.0	32.0	8.0	10.0
Retail Unit 3	41.5	33.2	26.6	6.6	8.3
Retail Unit 4	41.5	33.2	26.6	6.6	8.3
Retail Unit 5	50.0	40.0	32.0	8.0	10.0
Retail Unit 6	75.5	60.4	48.3	12.1	15.1
Retail Unit 7	54.5	43.6	34.9	8.7	10.9
Total	2,896.0	2,316.8	1,853.4	463.4	579.2

It is assumed that 80% of the total sales area would be used for the sale of convenience goods and 20% for comparison goods in both the supermarket and the small retail / commercial units. It is anticipated that the proposed supermarket will be operated by one of the discount grocery retailers (Aldi or Lidl) which sell a more limited range of comparison goods compared to the mid-market and premium grocery retailers (Tesco or Dunnes). The proposed supermarket has been designed having regard to the operational model and design standards of discount grocery retailers. Design features include a large, unencumbered floorplate of c. 2,500 sqm over a single storey of development with access to customer car parking to facilitate main food or trolley shopping trips. The proposed 80:20 convenience comparison split is consistent with the standard retail formats developed by the discount grocery retailers.

It is anticipated that the small retail / commercial units will be operated by a mix of convenience retail and retail services due to the size and format of the units they are not generally suitable

for most comparison retailers selling higher-order goods. However, it is considered appropriate to make an allowance for a small proportion of lower-order comparison goods to be sold in local convenience stores.

Based on the assumptions detailed above, the retail impact assessment (detailed in Sections 5 and 6) is prepared on the basis that the proposed development will provide up to 1,853.4 sqm net convenience sales floor area and up to 463.4 sqm net comparison sales floor area.

3.0 Planning Policy Context

This section of the RIS focuses on the policies and objectives of relevant national, regional and local planning policy documents as they pertain to retail uses and retail development. The Planning Statement submitted alongside this planning application, also prepared by KPMG FA, provides a comprehensive policy context.

3.1 National Policy Context

3.1.1 Project Ireland 2040 – National Planning Framework 2018 (NPF)

Project Ireland 2040 is the Government's long-term overarching strategy to make Ireland a better country for all of its people. There are various strands to Project Ireland 2040, with perhaps the most significant component being the National Planning Framework (NPF). The NPF outlines the Government's high-level strategy for the future sustainable development of Ireland.

Relevant National Policy Objectives which relate to the proper planning of retail development are set out below:

NPO 4: "Ensure the creation of attractive, liveable, well-designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being."

NPO 5: "Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity."

NPO 6: "Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets, that can accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area."

NPO 11: "In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth."

The proposed development is closely aligned with the National Policy Objectives listed above. The proposed development provides for a well-designed mixed-use scheme, which seeks to optimise use of a brownfield site in a key urban location. The enhanced retail provision will support the creation of new employment and stimulate economic activity in the local area and provide broader regeneration benefits whilst making Cherry Orchard a more attractive area in which to live, work, and visit.

3.1.2 Retail Planning Guidelines (2012) and Retail Design Manual (2012)

The Retail Planning Guidelines for Planning Authorities (RPGs) set out a strategic context for retail provision in development plans. Specifically, the principle aim of these guidelines is to provide a framework for the spatial distribution of new retail development, and to ensure that the planning system continues to play a key role in supporting competitiveness and choice in the retail sector.

While set out as guidance for planning authorities to prepare development plans and assess planning applications, they also provide a comprehensive framework for those developing proposals for new retail provision.

The RPGs contain five key policy objectives:

- 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
- Delivering quality urban design outcomes.

The RPGs establish a hierarchy of centres dependent on their scale and spatial context as follows:

- City and Town Centres
- District Centres
- Local Centre or Neighbourhood Centre

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

The RPGs set out three core criteria which should be considered when assessing the retail impact of a development – location, size, and impact.

Section 4.4 of the RPGs establishes the requirement for development proposals to demonstrate compliance with the sequential approach to the location of retail development as follows:

“Where the location of a proposed retail development submitted on a planning application is not consistent with the policies and objectives of the development plan and/or relevant retail strategy to support the city and town centre, then that development proposal, must be subject to the Sequential Approach and its policy principles and order of priority set out below and any departure from these principles must be justified.”

The proposed development adheres to the principles of sequential retail development and is consistent with the relevant retail policies / objectives of the DCDP.

The Subject Site is zoned Z14 'Strategic Development and Regeneration Area', specifically SDRA 4 – Park West / Cherry Orchard under the Dublin City Development Plan 2022 – 2028 (hereafter the "DCDP"). Shops (local and neighbourhood) are permitted in principle under the applicable Z14 zoning objective. Specific policy objectives for SDRA 4 aim to create a local neighbourhood centre within Cherry Orchard including new local retail provision and to create a new commercial destination at the train station including a supermarket.

The scale and format of proposed retail development as detailed in Section 2 of this report is consistent with the quantum of retail floorspace considered appropriate within SDRA 4 under the development plan. As such, there is no policy requirement to provide further justification in respect of the sequential approach.

Section 4.9 of the RPGs set out the criteria to be addressed through the RIS process when determining the retail impact of a proposed development. Appendix 8 requires the following criteria to be assessed in the quantitative retail impact assessment:

1. Identification of catchment or Study Area.
2. Estimation of expenditure available within the defined catchment or Study Area;
3. Estimation of the turnover of existing centres within the catchment area which is likely to be affected by a new development.
4. Estimation of the turnover of the new development for which a planning application is being lodged; and
5. Estimation of the quantum of consumer retail spending available in the catchment area which will be diverted from existing centres to the new retail development.

An assessment of the proposed development in relation to these criteria is set out in section 5 of this report.

The Guidelines are supported by the Retail Design Manual (2012), which provides design guidance for how retail development should contribute to the creation of vibrant, quality places. The proposed development represents a high design quality in line with the key principles set out in the manual and which has evolved in response to feedback from the planning authority. In particular, the proposal will deliver a significant improvement in the design quality of the public realm in Cherry Orchard particularly along Park West Avenue and around the train station.

3.2 Regional Policy Context

3.2.1 Regional Spatial and Economic Strategy (RSES) 2019-2031

The principal purpose of the RSES for the Eastern and Midland Regional Assembly (EMRA) is to support the implementation of the National Planning Framework and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the regions. In tandem with and as part of the RSES process, Metropolitan Area Strategic Plans ('MASPs') are provided with statutory

underpinning to act as twelve-year strategic planning and investment frameworks for the city metropolitan areas addressing high-level and long-term strategic development with the delivery of strategic infrastructure and housing as core issues.

The RSES sets out a retail hierarchy for the region, based upon the Retail Strategy for the Greater Dublin Area 2008 – 2016 ('RSGDA'). It is recognised in the RSES that the RSGDA is dissolved, and its assumptions are largely out of date. As such, RPO 6.10 notes the need for an updated strategy, and potential implications for the present hierarchy:

"RPO 6.10: EMRA will support the preparation of a Retail Strategy / Strategies for the Region in accordance with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update the retail hierarchy and apply floorspace requirements for the Region."

However, RPO 6.11 notes that proposals should be consistent with the retail hierarchy for the region contained in the RSES:

"RPO 6.11: Future provisions of significant retail development within the Region shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, and the retail hierarchy for the Region, expressed in the RSES, until such time as this hierarchy is updated."

As noted in Section 3.1.2, the location and scale of the proposed development is consistent with the site's designation in the retail hierarchy as a Key Urban Village (or District Centre) in the Dublin City Development Plan and Retail Strategy (2022) and the RSES.

3.2.2 The Retail Strategy for the Greater Dublin Area 2008 – 2016 (RSGDA)

The RSGDA sets out the retail hierarchy for Dublin City and broad retail floorspace thresholds for the region, council areas, and for each urban centre are identified. The RSGDA outlines a regional retail hierarchy comprised of city, town and/or district centres and sub-county town centres.

The strategy is largely no longer relevant with floorspace projections in particular out of date and reflective of Celtic Tiger era growth in the Irish economy and the retail sector. It also fails to reflect the substantial changes in consumer patterns over the recent decade, particularly the increase in online shopping accelerated by the Covid 19 pandemic. The DCC CDP at Appendix 2 acknowledges this stating:

"The RSGDA sets out the retail hierarchy for Dublin City and retail floor space thresholds for each urban centre. It is now largely recognised that the 2008 Strategy is out of date and was written at a time of unprecedented growth in the Irish economy. It was based on data at a time of record in migration, economic growth and expenditure. In this context, the floorspace projections are very ambitious and also do not reflect the pivotal changes that have occurred in the retail sector, particularly in the last number of years with the growth of online sales etc. "

However, the RSGDA still does form the primary basis for the designation of retail centres across the region, and for the categorisation of retail centres in development plans that have been recently adopted or are currently in preparation.

3.3 Local Policy Context

3.3.1 Dublin City Development Plan 2022 – 2028

The DCDP was adopted by Dublin City Council in November 2022 and came into effect on 14th December 2022. The following provisions from the plan are relevant to the assessment of retail impact for the proposed development.

Zoning

The Subject Site is zoned Z14 Strategic Development and Regeneration Area, specifically SDRA 4 – Park West / Cherry Orchard which has a Zoning Objective for such lands *“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.”*

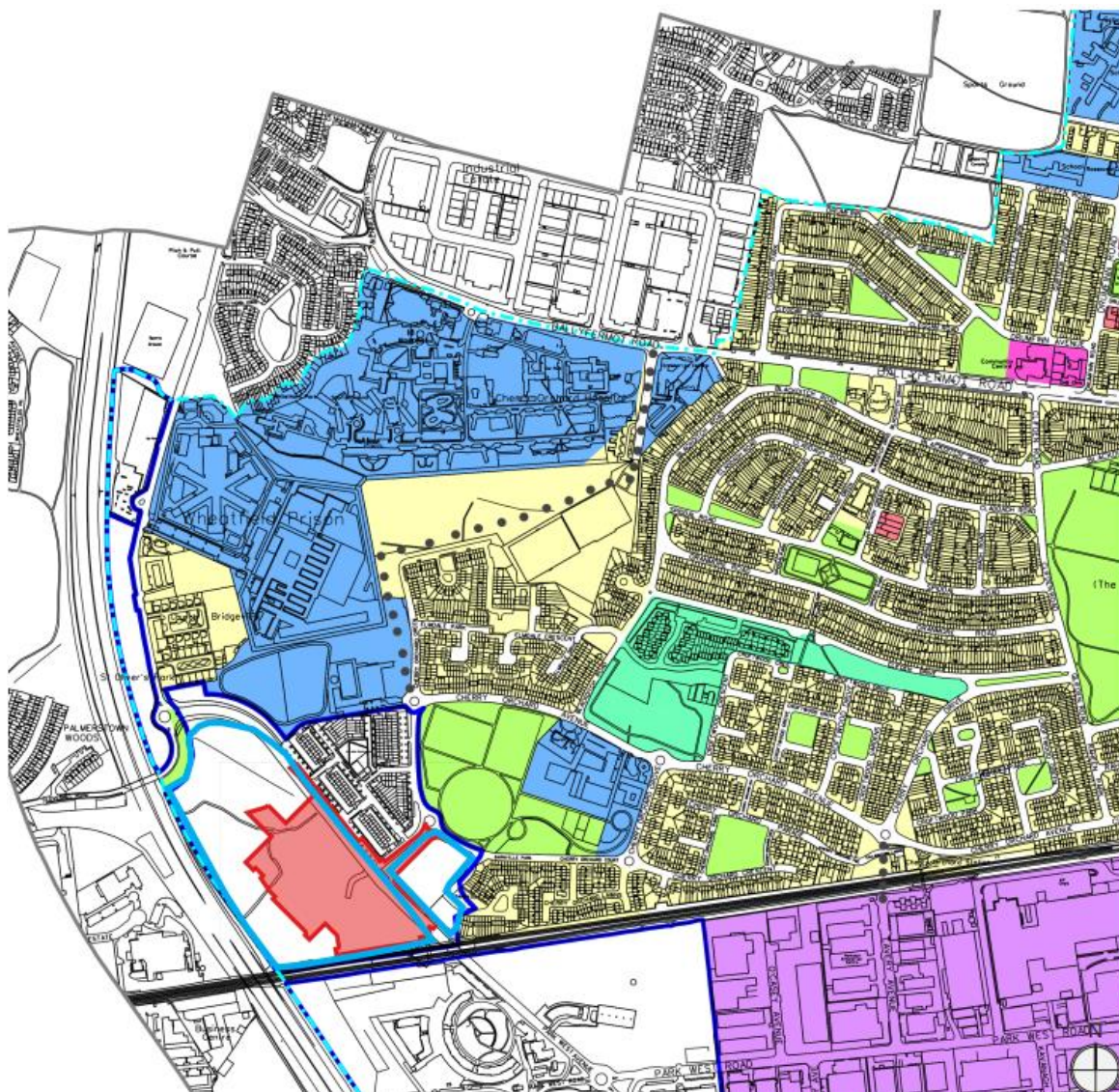


Figure 3-1: Dublin City Development Plan 2022 – 2028 Zoning Map (Subject Site in red)

The proposed retail /commercial uses are permissible under this zoning objective. The full range of uses which are permissible under the Z14 zoning objective include:

Assisted living/retirement home, **beauty/ grooming services**, bed and breakfast, buildings for the health, safety and welfare of the public, Build To Rent residential, **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 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 and recreational uses, student accommodation, **take-away**, training centre, **veterinary surgery**.

Additionally, the full range of uses which are Open for Consideration under the Z14 zoning objective include:

Open for Consideration: Advertisement and advertising structures, **betting office**, car park ancillary to main use, car trading, civic and amenity/recycling centre, cultural, creative and artistic enterprises and uses, funeral home, garage (motor repair/service), garden centre/ plant nursery, hostel (tourist), **internet café/call centre**, **laundromat**, nightclub, office-based industry, outdoor poster advertising, petrol station, pigeon lofts, postal hotel/motel, **shop (district)**, shop (factory shop), warehousing (retail/non-food)/retail park, warehousing.

Section 14.7.13 of the DCDP states that areas zoned Z14 are “capable of accommodating significant mixed-use development, of which residential would be the predominant use” and “must include proposals for additional physical and social infrastructure/facilities to support same.”

Section 13.6 of the DCDP sets out key guiding principles for the development of SDRA 4 – Park West/Cherry Orchard which reflect the guiding principles of the LAP. These principles include the following:

- “Create a local neighbourhood focal point within Cherry Orchard neighbourhood enhancing existing services and amenities and **providing new local retail provision**.
- Create a **new commercial destination in the vicinity of the train station, with mixed use and supermarket provision**, together with landmark buildings and civic spaces.
- Support opportunities and initiatives which promote education and aim to address unemployment supporting economic activity through the provision of existing and future services and businesses in the area.”

The retail element of the proposed development is fully consistent with the Z14 and SDRA 4 land use zoning designation. The proposed development will secure the residential-led redevelopment of a brownfield site and will deliver a range of supporting facilities including an

enhanced local neighbourhood centre with local retail provision and a new supermarket in the vicinity of the train station. The delivery of new modern high-quality retail and commercial units will support economic activity and job creation in Cherry Orchard by attracting services and businesses to locate in the area.

Specific Retail Policies

Chapter 7 of the Plan (The City Centre, Urban Villages and Retail) sets out objectives relevant for retail development. Appendix 2 of the DLR CDP provides a retail strategy for Dublin City. This strategy is in accordance with both regional and national policies and objectives and aims to ensure that all retail development is plan-led and promotes city / town centre vitality through the sequential approach to development. Relevant retail policy objectives include:

“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 application site forms a part of the SDRA 4 Cherry Orchard/Park West. The proposal will deliver the quantum, scale, and type of retail/commercial uses appropriate for Park West-Cherry Orchard SDRA, and achieves the regeneration aims of the site detailed out in the Local Area Plan.

“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 located within a designated SDRA and delivers a quantum and mix of retail uses considered appropriate for the Park West-Cherry Orchard SDRA. As such the proposal adheres to the principals of sequential retail development.

“CCUV6 Large Scale Retail / Mixed Use Developments: 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.”

The proposed retail / commercial units have been located at ground floor level along either side of Park West Avenue to animate this locally important route and will enhance the quality of the public realm. Car and cycle parking is conveniently located directly to the rear of the retail / commercial units.

“CCUV8 Competition and Innovation: To promote and facilitate competition and innovation in the retail sector to the benefit of the consumer, as an integral part of the proper planning and sustainable development of the city.”

The proposed development will improve consumer choice and competition in the local retail market by providing sustainable access to a greater range of retail goods and services for the existing and future communities of Cherry Orchard and Park West.

Section 7.5.3 sets out the role of the hierarchy of retail centres outside of the City Centre. The most relevant retail centres to this assessment include Naas Road District Centre / Key Urban Village (Level 3) and Ballyfermot District Centre / Key Urban Village (Level 3).

Section 7.5.4 sets out the objectives with regards to convenience and retail service shopping within the city across all levels of the retail hierarchy.

“CCUV27 Provision of Convenience Retail: 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.”

“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 a mix of convenience retail and retail services which are consistent with Cherry Orchard’s definition as a Neighbourhood Centre in the city-wide retail hierarchy (Level 4) and which will support the establishment of a new local focal point within Cherry Orchard neighbourhood for the benefit of existing and future communities.

Finally, the Retail Strategy at section 9.1 states that: *“Development proposals for significant retail development must be supported by a full Retail Impact Assessment. In general, significant retail development means 2,000 sq.m.+ net comparison floorspace and 1,500 sq.m.+ net convenience floorspace, located outside the city centre retail core and Key Urban Villages.”*

Based on Table 2-1 in this Report, the size/floorspace of the proposed retail unit falls within this threshold; the proposed development will provide up to 1,853.4 sqm net. Accordingly, an RIS determining the retail impact of the proposed development has been undertaken to demonstrate how the development satisfies all relevant DLR CDP policies and will make a positive impact to local retail environment.

3.3.2 Park West Cherry Orchard Local Area Plan (2019)

The Park West Cherry Orchard LAP was adopted by DCC on a statutory footing in October 2019. While the latest revision of the DCDP (2022-2028) post-dates the LAP it is considered that the LAP aligns with relevant sections of the DCDP as detailed above.

The LAP acknowledges the need for regeneration within Cherry Orchard and seeks to guide future development in a coordinated and sustainable manner, providing for the needs of the existing and future populations. The LAP aims to address the sporadic pattern of historic development over the last twenty years which has left some developments isolated and unconnected to amenities. The Subject Site forms a large part of Key Development Site 4 - M50-Cedarbrook Avenue Site as defined in the LAP.

The LAP aims to create a sustainable and attractive neighbourhood in Cherry Orchard which will maximise the benefit from new public transport infrastructure investments, including the DART+ Southwest, and provide much needed housing for the city. The LAP contains 46ha of land identifies for development with the potential to deliver approximately 2,000 new residential units alongside new mixed use and commercial development.

The LAP acknowledges that the area is poorly served by existing neighbourhood retail uses. Claddagh Green on Cherry Orchard Avenue contains a single small Centra convenience food store and some local retail facilities for Cherry Orchard and in Park West the Plaza Park West contains a small Spar convenience food store, but they do not form part of a village and do not provide for supermarket shopping.

The key guiding principles for the development of the LAP area as outlined under Section 3.2 of the LAP include:

- *“Facilitate the provision of local retail provision as part of enhancing the neighbourhood centre within Cherry Orchard.*
- *Create a new mixed-use environment incorporating a supermarket and other commercial/ employment opportunities in the vicinity of the train station.*
- *Create a new commercial destination in the vicinity of the train station, with landmark buildings and civic spaces.*
- *Support opportunities and initiatives which promote education and aim to address unemployment supporting economic activity through the provision of existing and future services and businesses in the area.”*

As detailed above, the proposed development provides a mix of convenience retail and retail services including a new supermarket in the vicinity of the train station which will support the establishment of a enhance neighbourhood centre within Cherry Orchard. In addition, the delivery of new modern high-quality retail and commercial units will support economic activity and job creation in Cherry Orchard by attracting services and businesses to locate in the area.

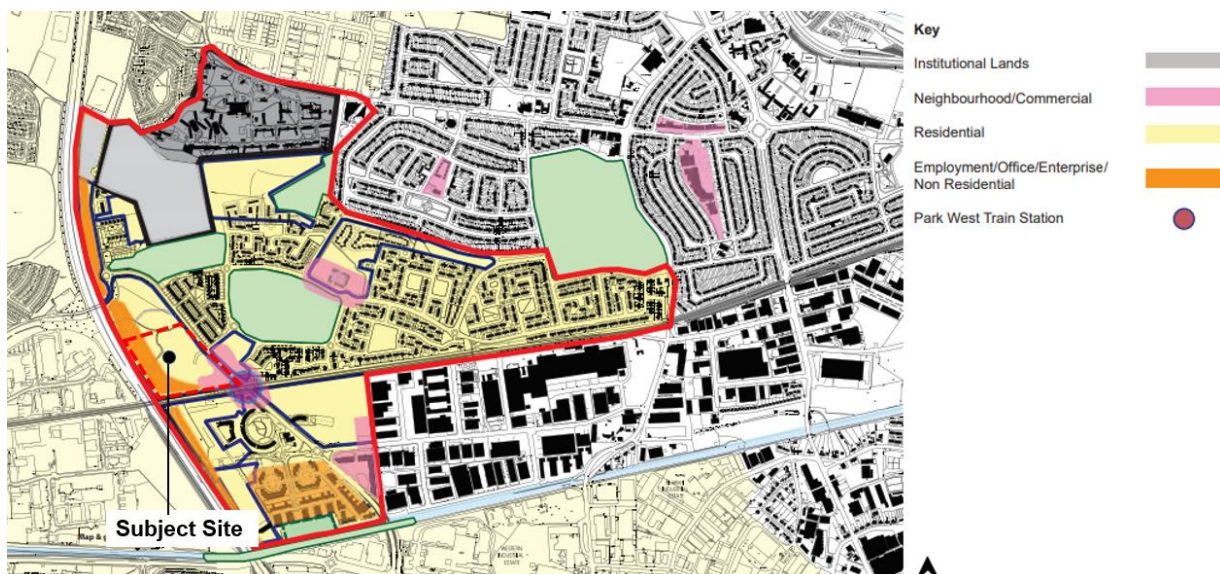


Figure 3-2 LAP Proposed Land Use Strategy (Source: Fig 35, Park West Cherry Orchard LAP)

3.3.3 South Dublin County Council Development Plan 2022 – 2028

While the Subject Site is located within Dublin City Council’s administrative area and subject to the objectives of the DCDP, it is appropriate to consider the objectives of the South Dublin County Development Plan (hereafter the SDCDP) for planned retail provision, and the implications of this for the proper assessment of retail provision within the proposed scheme. The SDCDP came into effect on the 3rd August 2022.

Section 9.4 of the SDCDP identifies the retail hierarchy for the County, which is generally consistent with that set out in the RSES. The relevant retail centres to this assessment which are situated close to SDCC’s boundary with Dublin City Council include:

- Liffey Valley Town Centre (Level 2)
- Clondalkin Town Centre (Level 3)
- Palmerstown Village, Palmerstown Shopping Centre and Rowlagh Village (Level 4).

Liffey Valley is designated as a Major Retail Centre in the SDCDP consistent with its level 2 Retail designation under the RSES. The SDCDP aims for the shopping centre to be redeveloped as a key public transport hub within the life of the plan which will provide the opportunity for the centre to further expand its offering and to take advantage of the opportunities provided by the vacant sites within the area. Policy EDE10 Liffey Valley Major Retail Centre sets out the policy objectives for Liffey Valley Town Centre:

“EDE10 Objective 1: To support Liffey Valley as a Major Retail Centre (MRC) and allow for the growth of the existing shopping centre and complementary leisure / entertainment, retail warehouse and commercial land uses.”

“EDE10 Objective 2: To support and facilitate consolidation of the quantum and quality of the retail offering at the Liffey Valley Major Retail Centre.”

“EDE 10 Objective 3: To support the development of retail warehousing within the Liffey Valley Major Retail Centre.”

“EDE10 Objective 4: To promote a high standard of urban design in the Major Retail Centre that contributes to the creation of safe and attractive spaces and creates desirable places within which to work and visit.”

Clondalkin is designated as a Town Centre in the SDCDP consistent with its level 3 retail designation under the RSES. The SDCDP identifies there is *“significant potential to expand retail and other town centre type uses on vacant lands within the town and to upgrade the existing shopping centre and surrounds.”*

Policy EDE11 Clondalkin Town Centre of SDCDP sets out the policy objectives for Clondalkin Town Centre:

“EDE11 Objective 1: To develop Clondalkin as a high quality, vibrant service and retail centre.”

“EDE11 Objective 2: To facilitate the provision of a high level and a broad range of retailing in the Core Retail Area of Clondalkin, along with a broad range of services and functions in the wider Town Centre zoning.”

“EDE11 Objective 3: To promote and encourage the enhancement and development / redevelopment of the identified retail / mixed use opportunity and other sites in the Core Retail Area of Clondalkin, including the Mill Centre lands, ensuring connectivity between sites and the town centre, to serve the established and growing catchment population.”

“EDE11 Objective 4: To protect the historic village core of Clondalkin, recognising the role it has in placemaking and the attractiveness of the town to retailing and other functions.”

3.4 Conclusion

This retail planning policy review confirms that the proposed development is fully in compliance with the objectives set out in relevant national, regional, and local development plan documents and guidelines. The proposed development provides a mix of convenience retail and retail services which are consistent with Cherry Orchard’s definition as a Neighbourhood Centre in the city-wide retail hierarchy (Level 4).

The proposed retail development adheres to the principles of sequential retail development. The scale of proposed retail development is consistent with the quantum of retail floorspace considered appropriate within SDRA 4 under the Development Plan. As such, there is no policy requirement to provide further justification in respect of the sequential approach.

In line with the requirements of the RPGs, an assessment of the retail impact of the proposal is not strictly required for the proposed development given its location within a proposed neighbourhood centre and the quantum of retail floorspace proposed. Notwithstanding this, an impact assessment determining the retail impact of the proposed development has been undertaken in Sections 5 and 6 of this report to demonstrate how the development satisfies all relevant policies and will make a positive impact to local retail environment.

4.0 Local Retail Context

This section provides an overview of the designated centres in the surrounding area most relevant to the consideration of retail development at the application site. Figure 4-1 identifies all designated centres with or on the edge of the 5-minute drive time catchment area which is adopted as the Study Area for the quantitative impact assessment in Section 5.0. The Study Area covers the administrative areas of DCC and SDCC. Section 5 of this report provides further justification for the adopted Study Area.

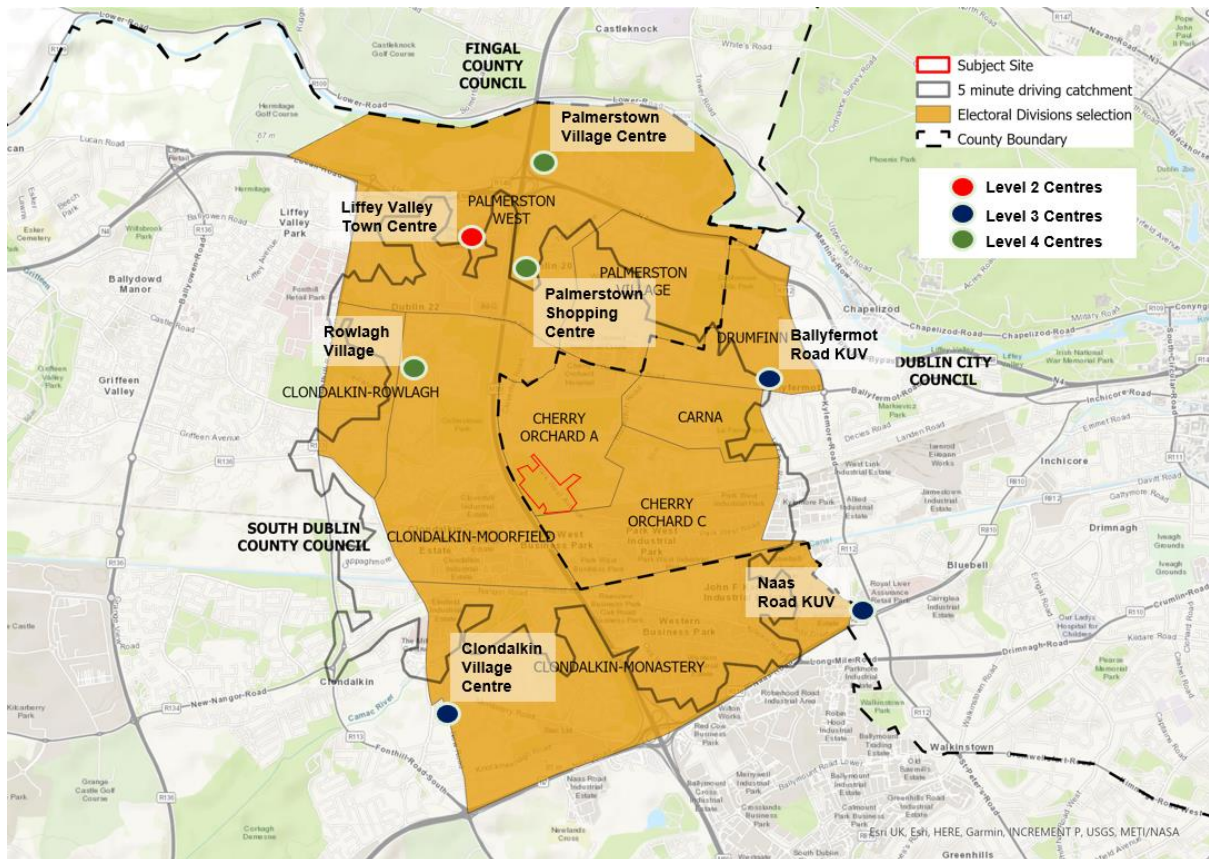


Figure 4-1 Designated Retail Centres in the Study Area

The Study Area contains seven existing retail centres which are designated as either Level 2, 3, or 4 centres in the Greater Dublin Area retail hierarchy. Dublin City Centre is the only Level 1 Metropolitan Centre in the region. The hierarchy of designated centres within the Study Area is as follows:

- Liffey Valley Town Centre (Level 2) (SDCC)
- Naas Road Key Urban Village (Level 3) (DCC)
- Ballyfermot Key Urban Village (Level 3) (DCC)
- Clondalkin Town Centre (Level 3) (SDCC)
- Palmerstown Village (Level 4) (SDCC)
- Palmerstown Shopping Centre (Level 4) (SDCC)
- Rowlagh Village (Level 4) (SDCC)

The retail impact assessment presented in Sections 5 and 6 of this report focuses on the above-listed designated centres.

4.1 Liffey Valley Town Centre

Liffey Valley Town Centre is a designated Level 2 Centre (Major Retail Centre) within the South Dublin City Retail Strategy located within SDCC's administrative area, just inside its boundary with DCC. The defined town centre includes Liffey Valley Shopping Centre and the adjacent Liffey Valley Retail Park. It is located at the junction of M50 Motorway and the N4 road and is very well connected to public transport routes being circa 2.19 kms via the M50 Motorway to the Subject Site.

The town centre consists of a mix of retail, retail warehouse, leisure, entertainment, and commercial uses. The shopping centre is anchored by Marks and Spencer, Dunnes Stores, Next, and Boots and consists of approximately 80 stores, 20 restaurants and a cinema. The town centre has a total retail sales area of 44,827 sqm net split between 4,170 sqm net convenience and 40,657 sqm net comparison¹. In addition, there are two extant planning permissions which if both implemented would provide an additional 16,219 sqm net comparison sales area². At present, there are two main convenience stores in the centre: Dunnes Stores and Tesco.

On-going redevelopment of the shopping centre is taking place with new and expanded retail offer and improved transport mobility measures. The centre is targeted to be converted into a key transport hub to provide opportunities for it to further expand its offering and to take advantage of the opportunities provided by the vacant sites within the area. Aligning with this objective, a new bus plaza opened at Liffey Valleys under the Bus Connects Programme.

Liffey Valley Town Centre draws trade from across the Greater Dublin Area however its primary catchment includes Palmerstown, Clondalkin, and Lucan areas.

By way of its scale, retail offer and location, Liffey Valley is not considered to compete readily with the proposed development for investment or consumer spending. Liffey Valley is primarily a comparison-shopping destination selling high-order goods with a large catchment area covering the GDA whereas the proposed development is intended to fulfil a local retail function providing a mix of convenience retail and retail services for existing and future communities of Cherry Orchard and Park West.

4.2 Naas Road Key Urban Village

Naas Road has been identified as a Key Urban Village in the Dublin City Retail Strategy in the context of significant residential development planned for the area, with the area designated as the future Key Urban Village being located circa 3.09 kms south from the application site via M50 Motorway. Currently, the area primarily contains large format "big box" retail warehouse units set within surrounding industrial sites. The Dublin City Retail Strategy (2022) notes that despite the LAP for the area identifying the potential for upwards of 35,000 sqm

¹ Retail Impact Statement Liffey Valley Plaza (March 2020) Avison Young

² Pl. Ref SD19A/0078 and Pl. Ref. SD20A/0089

retail floorspace, the Council does not envision that a future District Centre will exceed 20,000 sqm net retail floorspace.

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.

Naas Road is not considered to compete directly with the proposed development either for investment or for consumer spending and investment because of its scale, retail offer and location relative to the Subject Site. The proposed retail development is intended to serve a local function providing a mix of convenience retail and retail services for existing and future communities of Cherry Orchard and Park West.

4.3 Ballyfermot Key Urban Village

Ballyfermot Village is a designated Level 3 Centre (Key Urban Village) within the Dublin City Retail strategy. It is located adjacent to Le Fanu Road and R833, circa 3.36 kms via Kylemore Road towards east of the application site.

Anchored by Tesco, Ballyfermot Village takes a form of two storey parade of retail units along R833 which consists of a generous amount of service retail, cafes, restaurants, and pubs.

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. Convenience retail units include Tesco, Mr. Price, Iceland, SPAR, and pharmacy. Comparison units comprises mobile phone repair, clothing and merchandise, gift shop, betting shop and optician. Ballyfermot is also served via 40 and 79 bus routes.

Ballyfermot Village is expected to compete to a limited degree with the proposed development for consumer spending and investment because of its scale, retail offer and location relative to the Subject Site. Ballyfermot Village predominantly provides a mix of convenience retail and retail services which serve its local catchment.

4.4 Clondalkin Town Centre

Clondalkin Town Centre is a designated Level 3 Centre (Town Centre) within the South Dublin City Retail Strategy. It is located adjacent to New Nangor Road and M50 Motorway circa 2.28 kms via New Nagor Road and M50 Motorway to the Subject Site. The established town centre use in this area allows for complementary leisure, town centre retail and commercial land uses including the Round Tower's new visitor centre and gardens, which is close to the popular Happy Pear Café.

Currently, the village centre has four major convenience retail facilities: Dunnes Store, Tesco, SPAR, and Centra. Clondalkin Town Centre offers a pleasant shopping experience to visitors with its network of shopping streets and the Mill Shopping Centre. The majority of the retail provisions in the centre is provided within the Mill Street Shopping Centre.

The shopping centre was originally built in 1994 on the lands of Clondalkin paper mills and is now anchored by Dunnes Stores. The centre contains over 30 shops offering quality retail

outlets including women's fashion outlet stores, health shops, post office, restaurants, along with card/ toy and stationery/ bookstores, jewellers, bargain shops, pharmacies, opticians, phone stores, stores with fashion accessories, hairdressers, household goods, photo printing, coffee shop and restaurant, butchers, e-cigarette suppliers, and travel agent. The shopping centre with a floor area of approximately 9,029.90 sq.m GFA takes a shape of a linear mall with circa 820 no. surface level car parking spaces.

Clondalkin Town centre also comprises of other small-scale convenience and retail offerings like artisan shops, restaurants, pubs, pharmacies, and hairdressers. Existing non-retail uses within the town centre includes solicitors, libraries, Clondalkin leisure centre, Áras Chrónáin - Irish cultural centre, libraries, and post office.

The South Dublin City Retail Strategy aims to promote the redevelopment of identified mixed use opportunity sites in the core retail area of Clondalkin and identifies significant potential to upgrade the existing shopping centre and surrounds.

Clondalkin Town Centre is expected to compete to a greater degree with the proposed development for consumer spending and investment because of its location relative to the Subject Site and the strength of its convenience shopping offer.

4.5 Palmerstown Village

Palmerstown Village is a designated Level 4 Centre (District Centre) within the South Dublin City Retail Strategy. Palmerstown being one of the nine traditional villages of South Dublin County Council was identified for the council's active travel. It is located adjacent to N4 Dublin Sligo Road and River Liffey circa 2.38 kms shortest route via Coldcut Road and Cloverhill Road to the northeast of the application site.

Palmerstown Village is an attractive village above the River Liffey. Palmerstown Village is typically low rise with buildings generally two storeys in height. The village is made up of the cluster of local amenities and services with a main retail concentration along Kennelsfort Road. It consists of small-scale convenience stores, church, pubs, restaurants, general enterprises, bank healthcare service, schools, and community centre. There is a large number of suburban dwellings and labourers' cottages located towards north of the village. Major convenience retail uses include a SuperValu at the southern end of Palmerstown, and an Aldi near the old village accessed via Old Lucan Road. There are couple of local food and beverage outlets in the town such as the Palmerstown Inn and Coach House. Palmerstown village benefits from being co-located next to recreational facilities. Waterstown Park located in Palmerstown Village is a 35 Ha area designated as a special amenity area with walking trails.

Palmerstown Village is expected to compete to a greater degree with the proposed development for consumer spending and investment because of its location relative to the Subject Site and the similarity of its convenience shopping offer. The convenience offer is anchored by a discount retailer (Adli).

4.6 Palmerstown Shopping Centre

Palmerstown Village is a designated Level 4 Centre (District Centre) within the South Dublin City Retail Strategy. It is located at West Kennelsfort Road Upper and south of Palmerstown Village circa 1.78 kms via Coldcut Road and Cloverhill Road to the northeast of the application site.

The centre is made up of an informal parade of mainly convenience retail primarily situated along the western side of Kennelsfort Road upper which joins the Ballyfermot Road to the Lucan Road. The parade is covered by a series of high-pitched double roof. Anchored by the only convenience retail in the centre SuperValu supermarket, the shopping centre approximately comprises of 13 units including a gym, coffee shop, book shop, Palmerstown youth and community centre, salon, decorating centre, takeaways, and restaurants. The centre has a surface level car park. Palmerstown shopping centre is also served via 18 and 26 bus routes.

Palmerstown Village is expected to compete to a more limited degree with the proposed development for consumer spending and investment because of its scale and limited convenience retail offer.

4.7 Rowlagh Village

Rowlagh Village Centre recently receiving a 'village status' is now a designated Level 4 Centre (District Centre) within the South Dublin City Retail Strategy. It is located at Liscarne Close near the main roundabout intersection with the Neilstown Road circa 2.41 kms via Lucan-Newlands Road to the northwest of the application site.

Rowlagh Village centre is a newly developed small village centre which widely serves Clondalkin area and consist of a range of amenities and services to cater to the needs of the community of Clondalkin. The village centre anchored by SuperValu consists of convenience stores and community facilities with a parade of 8 (approx.) units. The parade is covered by a series of two storey units reflecting the pattern of residential development that surrounds the site. The centre runs from Rowlagh community centre to north Clondalkin library with shop units occupying 6 units and services with community service occupying 2 adjacent units. Retail units situated along Neilstown Road includes small scale convenience store, frozen food shop, butcher shop, pubs, restaurants, bedding shop, pharmacy, and barbers. The net sales area of the village is approximately 500 sq.m net. Community facilities include Dóchas family centre, Neilstown community centre, CEEDS, Clondalkin centre for unemployed, Rowlagh women's group, health centre, church, community café, and a creche. The village benefits from a large surface car park.

Rowlagh Village Centre is expected to compete to a more limited degree with the proposed development for consumer spending and investment because of its scale and limited convenience supermarket retail offer.

4.8 Other Retailers

There are also some standalone convenience retailers, predominately discount retailers, in the surrounding area, which are located outside of the defined centres contained in the DCC and SDCC retail hierarchies. In relation to the application site, the most relevant of these are:

- Lidl Ballyfermot Rd, Johnstown, Dublin
- Lidl 22 Fonthill Rd, Ronanstown, Dublin, D22 H6E8
- Lidl New Nangor Road, Ballymanaggin, Dublin
- Aldi Kylemore Rd, Inchicore, Co. Dublin, D10 DR58
- Aldi Fonthill Retail Park, Unit 3, Lucan, Co. Dublin, D22 HO22

It is worth noting that the Dublin City Retail Strategy does not define all centres as Level 4 or Level 5 retail centres, in particular smaller centres. While there are a number of such premises within the surrounding area, there are not considered to be significant with regards the retail impact of the proposed development.

5.0 Quantitative Analysis

5.1 Method

This quantitative retail impact analysis has been carried out in accordance with the method outlined in Appendix 8 of the RPGs and in this regard specifically assesses:

1. Identification of catchment or Study Area
2. Estimation of expenditure available within the defined catchment or Study Area
3. Estimation of the turnover of existing centres within the catchment area which is likely to be affected by a new development
4. Estimation of the turnover of the new development for which a planning application is being lodged and
5. Estimation of the quantum of consumer retail spending available in the catchment area which will be diverted from existing centres to the new retail development.

The robustness of any quantitative assessment relies on the suitability of parameters and assumptions and the accuracy of data inputs. This section sets out the range of data inputs used to build up the model and explains all assumptions that have been used. A number of key assumptions used in this assessment are derived from the Retail Strategy for the GDA published in 2008 which is the most up to date retail study for the GDA.

5.2 Identification of Study Area

This section establishes the Study Area (or catchment area) of the assessment, i.e., the geographic area from where the proposed development will derive most of its trade from (customers and spending).

To establish a Study Area for the proposed development we have assumed that it will derive most of its trade from the area within an up to 5-minute drive time of the Subject Site. This is based on the assumption that most customers would generally travel up to 5 minutes by car in a built-up area such as Dublin for a main (weekly) food shopping trip. This assumption is justified since the enhanced neighbourhood centre at Cherry Orchard will be anchored by a new supermarket which contains predominantly convenience floorspace (80%).

Section 5.4 of this report forecasts the total population and retail expenditure of the Study Area. To derive an accurate population figure for the Study Area we have refined the 5-minute drive time boundary to align as closely as possible with Electoral Division ('ED') boundaries which form the basis of our population and spending forecasts in the sections below. The resultant Study Area is shown in Figure 5-1. The Study Area is made up of 9 no. EDs of which 4 no. are in DCC (including the Subject Site) and 5 no. in SDCC.

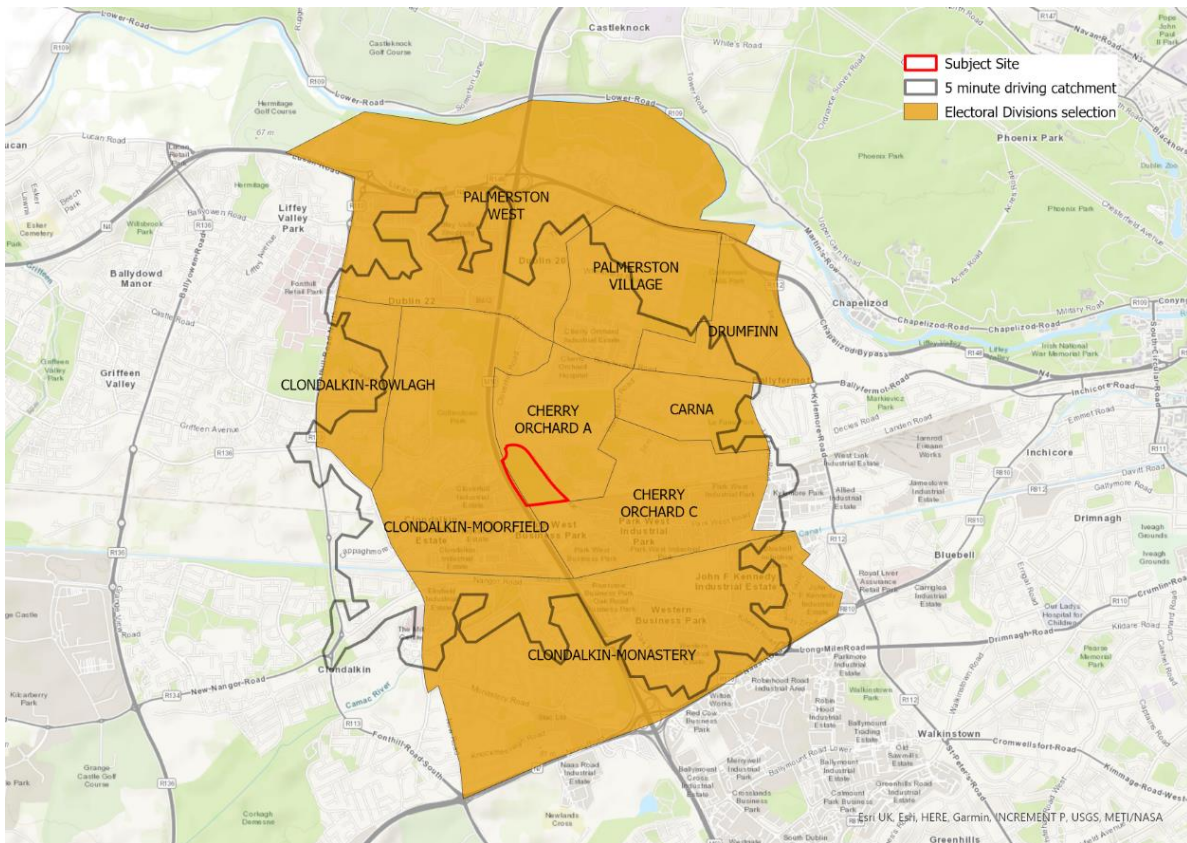


Figure 5-1 Study Area as denoted by the ED boundaries

5.3 Assessment Timeframe

The base year for our assessment is 2023 (i.e., current year) and the design year, which is the year we assess impact in, is 2029. This assumption is based on the expectation that the development will be completed, and retail units can commence trading by 2027. We have tested impact in 2029 to allow two years for trading patterns to become established after opening in line with industry best practice. The opening year assumed in this report is consistent with assumptions made in the EIAR prepared as part of this planning application, notably the traffic and transport assessment.

5.4 Population and Retail Expenditure in the Study Area

Table 5-1 shows per capita convenience and comparison expenditure for the Study Area in 2023 (base year) and 2029 (impact year).

The most up to date per capita spending data was captured from the CSO database for 2022. Using this as our base, per capita expenditure has been forecast for 2023 and 2029 by applying an annual expenditure growth rate of 1.5% for convenience and 4.2% for comparison up to 2029. The growth rates applied represent the average year-on-year growth rates achieved in the convenience and comparison sectors between 2017-2022 derived from the CSO Retail Sales Index³. We have therefore assumed that retail expenditure over the next six years will continue to grow at the same rate as the previous five years.

³Dublin Economic Monitor (November 2022) Dublin Mastercard Spending Pulse: <https://dmonitor-prd.s3.eu-west-1.amazonaws.com/wp-content/uploads/2022/11/07170729/spending-pulse-november-2022f.pdf>

Table 5-1 Study Area Per Capita Expenditure⁴

	2023 (€)	2029 (€)
Convenience	2,176.7	2,380.0
Comparison	3,456.6	4,424.4

Source: 2022 data from CSO database. 2023 & 2029 data are KPMG-FA calculations.

To estimate total expenditure in the Study Area to 2029 it is first necessary to estimate the total population of the Study Area. To forecast the population of the Study Area in 2029, we have used population figures derived by KPMG-FA from the 2022 Census data. This assessment uses the 2022 Census population figures as the base and applies an annual growth rate based on the historical growth rate trend recorded for the 2016-2022 intercensal period by the Census.

The population of the Study Area in 2023 is forecast to be 53,179. Table 5-2 shows the Study Area has a forecast population of 55,226 in 2029, an increase of 2,047 persons or 4%. By applying this population figure to the per capita expenditure figures in Table 5-1, it is forecasted that total expenditure in the Study Area will equate to €375.8m in 2029.

Table 5-2 Study Area Population and Total Available Retail Expenditure

	Population	Convenience Spend (€m)	Comparison Spend (€m)	Total Retail Spend (€m)
2023	53,179	115.8	183.8	299.6
2029	55,226	131.4	244.3	375.8
Growth 2023-2029	2,047	15.7	60.5	76.2

Source: KPMG-FA calculations

5.5 Turnover of Proposed Development

Table 5-3 shows the total retail floorspace and total retail turnover of the proposed development split out into convenience and comparison in 2023 (base year) and 2029 (design year).

To forecast the turnover of the proposed floorspace in 2029 we have applied a consistent turnover rate of €12,255.5 per sqm for convenience floorspace and €9,190.9 per sqm for comparison floorspace. The turnover rate is derived from the GDA Retail Strategy which applies an average turnover rate of €12,000 per sqm for convenience and €9,173 per sqm for comparison floorspace in the GDA in 2008. We have then applied an annual trading efficiency growth rate of 1% to both the convenience and comparison turnover rate up to 2029 in line with the GDA Retail Strategy trading efficiency growth assumptions.

⁴ Annual expenditure growth rate applied convenience +1.5% and comparison 4.2%

Table 5-3 Turnover of Proposed Development

	Net floor area sq.m.	Turnover density (€ per sqm)	Turnover in 2029 (€m)
Convenience	1,853	12,254.5	22.7
Comparison	463	9,190.9	4.3
Total	2,317	-	27.0

Source: KPMG-FA calculations

5.6 Turnover of Existing Retail Stores in the Study Area

Table 5-4 identifies the net floorspace within the centre/store and the retained turnover of each centre/store in 2029 which is drawn from the Study Area. Table 5-4 shows the total retained turnover of centres and standalone retail stores in the Study Area equates to €258.5m in 2029 excluding the proposed development.

Table 5-4 Retained Turnover of Existing Retail Destinations in the Study Area in 2029⁵

Location	Convenience Net floor area sqm	Convenience turnover (€m)	Comparison Net floor area sqm	Comparison turnover (€m)	Total turnover (€m)
Designated Centres					
Liffey Valley Town Centre ⁶	4,170	20.4	40,657	25.6	46.0
Ballyfermot Key Urban Village	4,042	37.1	485	3.3	40.5
Clondalkin Town Centre	6,837	41.9	7,017	32.2	74.1
Palmerstown Village	1,480	14.5	1,056	7.8	22.3
Palmerstown Shopping Centre	878	10.8	376	3.5	14.2
Rowlagh Village*	1,042	10.2	447	3.3	13.5
Standalone Supermarkets					
Lidl Ballyfermot Rd Johnstown	1,310	11.2	146	0.9	12.2
Lidl 22 Fonthill Rd Ronanstown	1,040	6.4	116	0.5	6.9
Lidl New Nangor Road Ballymanaggin	1,332	11.4	148	1.0	12.4
Aldi Kylemore Rd Inchicore	1,245	7.6	138	0.6	8.3
Aldi Unit 3 Fonthill Retail Park	1,231	7.5	137	0.6	8.2
Total		179.2		79.4	258.5

Source: KPMG-FA calculations

⁵ Turnover rates applied to all locations: €12,255.5 per sqm convenience & €9,191.9 per sqm comparison.

The proportion of total turnover drawn from households in the Study Area is assumed as follows: Liffey Valley Town Centre: 40% convenience and 5% comparison; Ballyfermot Key Urban Village: 75% convenience and comparison; Clondalkin Town Centre: 50% convenience and comparison; Palmerstown Village: 80% convenience and comparison; Palmerstown Shopping Centre: 90% convenience and comparison; Rowlagh Village: 80% convenience and comparison; Lidl Ballyfermot Rd Johnstown: 70% convenience and comparison; Lidl 22 Fonthill Rd Ronanstown: 50% convenience and comparison; Lidl New Nangor Road Ballymanaggin: 70% convenience and comparison; Aldi Kylemore Rd Inchicore: 50% convenience and comparison; and Aldi Unit 3 Fonthill Retail Park: 50% convenience and comparison.

⁶ Liffey Valley floorspace includes two retail commitments: Liffey Valley Plaza permission for 14,99 sq.m. net retail comparison floorspace (Reg Ref. SD20A/0089) and Liffey Valley Retail Park permission for a 1,220 sqm net mezzanine in Unit 14 (Reg. Ref. SD19A/0078)

As detailed in Section 4, there are a number of designated retail centres and large standalone retail stores within the Study Area. It is acknowledged that there are also other small convenience stores located throughout the Study Area located outside of designated centres. It has not however been possible to accurately quantify the turnover of these small shops since an up-to-date database detailing the floor areas of small shops is unavailable for the Dublin City and South Dublin areas.

The net floorspace of each centre / store has been identified from publicly available planning application documents. The turnover of each centre/store has been forecasted by applying a turnover rate to the net floorspace figure. We have applied a consistent turnover rate of €12,255.5 per sqm for convenience floorspace and €9,190.9 per sqm for comparison floorspace in line with the GDA Retail Strategy for each centre/store except where specific turnover rates are available for stores in published planning application documents.

Table 5-4 shows the turnover of retail destinations drawn from the Study Area. As such we have had to make assumptions for each retail destination about the proportion of its total turnover which is derived from households residing in the Study Area. Key considerations which have informed these assumptions include the location of the destination relative to the Study Area boundary and the scale, role, and function of the retail destination being considered. For example, retail destinations located centrally in the Study Area are expected to draw a higher proportion of their trade from within the Study Area compared to those located on the periphery. Further, retail destinations which mostly sell high-order comparison goods (such as Liffey Valley) are expected to draw a low proportion of their trade from the Study Area since they will have a larger catchment area extending well beyond the Study Area. For example, Liffey Valley Town centre has a wide catchment area which extends across the GDA⁷.

5.7 Trade Diversion and Impact

It has been forecast that by 2029 the total expenditure generated by the resident population within the Study Area will equate to €375.8m however, this expenditure will be available to support the turnover of stores both within and outside of the Study Area. Therefore, we must make informed assumptions about the amount of spending retained within the Study Area locally.

In Table 5-5 we have assumed that 90% of total convenience expenditure and 70% of total comparison expenditure is retained within the Study Area in 2029. These assumptions are robust and reflect existing patterns of retail provision as detailed in Section 4 of this report. Most of the Study Area is generally very well served by an established network of convenience retail facilities and comparison stores at Liffey Valley Town Centre. As detailed in Section 4, all existing designed centres provide a good standard of convenience retail provision with at least one supermarket and additional small, specialised convenience stores (such as butchers). The network of designated centres is enhanced by several standalone supermarkets.

⁷ Refer to Retail Impact Statement Liffey Valley Plaza (March 2020) Avison Young

Liffey Valley Town Centre is the primary comparison-shopping destination for households residing in the Study Area due to the wide range of comparison retailers represented in the centre selling both bulky and non-bulky goods and the relative ease of access to the centre by both private and public transport modes⁸.

Table 5-5 Retained Expenditure in the Study Area 2029 (€m)⁹

	€m	%
(A) Retained total expenditure (€m)	289.3	100%
(B) Turnover existing retail destinations + commitments (€m)	258.5	89%
(C) Turnover proposed development (€m)	27.0	9%
(D) Residual total expenditure (€m)	3.8	1%

Source: KPMG-FA calculations

Table 5-5 shows that the retained turnover of retail destinations, including retail commitments equates to 89% of total retained expenditure in 2029 and the proposed development equates to a further 9% of total retained expenditure. This supports our earlier finding that the Study Area is very well served by existing retail facilities. Retail commitments are retail schemes which have permission but have not been built out. In total we have identified a total of 16,219 sqm net committed comparison retail floorspace in the Study Area in Liffey Valley Town Centre with a forecast turnover of €145.9 in 2029¹⁰.

Table 5-5 shows that once deductions have been made for the turnover of existing centres, retail commitments and the proposed retail floorspace there is a residual expenditure of €3.8m which would be available to support the turnover of new floorspace elsewhere in the Study Area. This assessment demonstrates that there is sufficient demand within the Study Area to absorb the turnover of the proposed retail floorspace without diverting spending from existing retail destinations.

5.8 Retail Spend Generated by the Proposed Development

When assessing the retail impact of the proposed development it must be borne in mind that the proposed retail floorspace is part of a large residential-led mixed use development and that these new residential units will generate additional retail spending. The proposed development includes 708 residential units in Phase 1 with potential for an additional 408 units in Phases 2 and 3.

The total population of the proposed development (Phase 1) is 1,982 persons and the additional expected population of future Phase 2 and 3 is 1,142 persons, a total population of 3,125 over the three phases. This new population will generate additional retail spending which will be available to support the turnover of the proposed retail floorspace as well as existing retail destinations in the Study Area.

⁸ Refer to Retail Impact Statement Liffey Valley Plaza (March 2020) Avison Young

⁹ Informed assumptions applied in this assessment include: 90% of the proposed development's turnover is drawn from within the Study Area and 10% of the proposed development's turnover is drawn from outside the Study Area (inflow spend); 90% of total convenience spending is retained in the Study Area; and 70% comparison spending is retained in the Study Area.

¹⁰ Liffey Valley Plaza permission for 14,99 sq.m. net retail comparison floorspace (Reg Ref. SD20A/0089) and Liffey Valley Retail Park permission for a 1,220 sqm net mezzanine in Unit 14 (Reg. Ref. SD19A/0078)

Table 5-6 shows that the forecast total retail spending generated by the total population amounts to €22.5m which equates to 79% of the turnover of the proposed retail floorspace.

Table 5-6 Retail Spend Generated by Development Phases 1, 2 & 3 in 2029

	2029
Population	3,125
Convenience Retail Spend Per Capita (€)	2,380.0
Convenience Retail Spend Total (€m)	7.4
Comparison Retail Spend Per Capita (€)	4,424.4
Comparison Retail Spend Total (€m)	13.8
Total Retail Spend (€m)	21.3
% of Proposed Development Turnover	79%

Source: KPMG-FA calculations

This assessment demonstrates that the proposed development will be largely self-contained and that the proposed retail development is of a suitable scale to meet the neighbourhood shopping needs of the local catchment in Cherry Orchard Park West. It is therefore concluded that the scale and format of the proposed retail development is consistent with Cherry Orchard's identification as a Neighbourhood Centre in the DCDP retail hierarchy.

5.9 Conclusion

The foregoing expenditure capacity exercise illustrates that there is more than adequate available retail expenditure within the Study Area to support the proposed development without diverting expenditure from existing retail destinations in the design year (2029).

The proposed retail floorspace is not expected to have a significant impact on existing shopping patterns since it is proposed to address an identified local need for neighbourhood shopping facilities in Cherry Orchard and Park West as highlighted in local planning policy. This is supported by the analysis presented in Section 5.8 of this report which demonstrates that the proposed development will be largely self-contained; the new population generated by the development (Phases 1, 2 & 3) will generate an equivalent of 79% of the turnover of the proposed retail floorspace.

Given that the proposed retail floorspace is intended to serve existing and new communities in Cherry Orchard and Park West it is concluded that the proposed development is not expected to have a significant impact on existing shopping patterns.

The analysis presented in Section 5.8 of this report also demonstrates that the scale and format of the proposed retail development is consistent with Cherry Orchard's identification in the DCDP as a neighbourhood centre in the retail hierarchy.

Drawing together these findings we conclude that the proposed development will not have a significant adverse retail impact on any existing centre.

6.0 Qualitative Analysis

This section provides a qualitative analysis of the benefits and likely impacts of the proposed development in the context of its retail offer and that of surrounding retail centres in the Study Area as detailed in Section 4 of this report.

6.1 Method

The qualitative retail impact analysis presented in this section has been carried out in accordance with the criteria outlined under Section 4.9 of the RPGs and in this regard specifically assesses whether the proposed development would:

- a) support the long-term strategy for city/town centres as established in the retail strategy/development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres
- b) have the potential to Increase employment opportunities and promote economic regeneration
- c) have the potential to increase competition within the area and thereby attract further consumers to the area
- d) respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support
- e) cause an adverse impact on one or more city/town centres, either independently or cumulatively with recent developments or other outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community
- f) cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term
- g) ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society and / or
- h) link effectively with an existing city/town centre so that there is likely to be commercial synergy.

6.2 Assessment of Proposed Development

Table 6-1 Assessment against Key Criteria of 2012 Retail Planning Guidelines

RPG Criteria	Assessment of Proposed Development
<p>a) Support the long-term strategy for city/town centres as established in the retail strategy/development plan, and not materially diminish the prospect of attracting private sector investment into one or more such centres;</p>	<p>The quantitative retail impact assessment presented in Section 5 of this report demonstrates that the proposed retail development will not have a significant adverse retail impact on any existing centre in the establish retail hierarchy.</p> <p>The proposed retail floorspace is not expected to have a significant impact on existing shopping patterns since it is proposed to address an identified local need for</p>

RPG Criteria	Assessment of Proposed Development
	neighbourhood shopping facilities in Cherry Orchard and Park West as highlighted in local planning policy. This is supported by the analysis presented in Section 5.8 of this report which demonstrates that the proposed development will be largely self-contained; the new population generated by the proposed development will generate an equivalent of 56% of the turnover of the proposed retail floorspace.
b) Have the potential to increase employment opportunities and promote economic regeneration;	The proposed retail development will provide new modern high-quality retail and commercial units which will support economic activity and job creation in Cherry Orchard by attracting services and businesses to locate in the area.
c) Will it have the potential to increase competition within the area and thereby attract further consumers to the area; d) Will it respond to consumer demand for its retail offering and not diminish the range of activities and services that an urban centre can support;	<p>The proposed retail floorspace aims to address an identified local need for neighbourhood shopping facilities in Cherry Orchard and Park West as highlighted in local planning policy. There is currently no supermarket in Cherry Orchard and Park West and the nearest supermarket is Lidl on New Nangor Road in Ballymanaggin which is a 5-minute drive or 35-minute walk from the Subject Site.</p> <p>The proposed development will improve consumer choice and competition in the local retail market by providing sustainable access to a greater range of retail goods and services for the communities in Cherry Orchard and Park West.</p>
e) Cause an adverse impact on one or more city/town centres, either singly or cumulatively with recent developments or other outstanding planning permissions (which have a realistic prospect of implementation) sufficient to undermine the quality of the centre or its wider function in the promotion and encouragement of the arts, culture, leisure, public realm function of the town centre critical to the economic and social life of the community;	<p>The quantitative retail impact assessment presented in Section 5 of this report demonstrates that the proposed retail development will not have a significant adverse retail impact on any existing centre in the establish retail hierarchy cumulatively with outstanding retail planning permissions (retail commitments¹¹).</p> <p>The proposed retail floorspace is not expected to have a significant impact on existing shopping patterns since it is proposed to</p>

¹¹ Retail commitments assessed as part of the quantitative retail impact assessment in Section 5 include: Liffey Valley Plaza permission for 14,99 sq.m. net retail comparison floorspace (Reg Ref. SD20A/0089) and Liffey Valley Retail Park permission for a 1,220 sqm net mezzanine in Unit 14 (Reg. Ref. SD19A/0078)

RPG Criteria	Assessment of Proposed Development
	<p>address an identified local need for neighbourhood shopping facilities in Cherry Orchard and Park West as highlighted in local planning policy. This is supported by the analysis presented in Section 5.8 of this report which demonstrates that the proposed development will be largely self-contained; the new population generated by the proposed development will generate an equivalent of 56% of the turnover of the proposed retail floorspace.</p>
<p>f) Cause an increase in the number of vacant properties in the primary retail area that is likely to persist in the long term;</p>	<p>Considering the findings of the quantitative retail impact assessment presented in Section 5 of this report, it is considered that there is no likelihood that the proposed development would result in an increase in the number of vacant properties in any designated centre.</p>
<p>g) Ensure a high standard of access both by public transport, foot and private car so that the proposal is easily accessible by all sections of society; and/or h) link effectively with an existing city/town centre so that there is likely to be commercial synergy.</p>	<p>The proposed retail floorspace (including the supermarket) has been located beside the station and fronting along Park West Avenue to provide improved sustainable access to convenience retail facilities for both existing and future communities of Cherry Orchard and Park West.</p> <p>Park West Avenue is a busy transport hub for rail and bus transport links which will increase in footfall and activity on completion of the DART + upgrade to the railway line and the implementation of Bus Connects in Cherry Orchard. The positioning of the supermarket and small retail units aims to maximise opportunities for linked trips and reduce the reliance on private car journeys to access larger supermarkets which provide a greater range of goods.</p>

In conclusion the proposed development complies with all relevant qualitative RPG criteria for assessing retail impact as demonstrated in Table 6-1.

7.0 Summary and Conclusion

The key findings of this report are summarised below:

- Section 5.7 of this report demonstrates that there is more than adequate available retail expenditure within the Study Area to support the turnover of the proposed development without diverting expenditure from existing retail destinations in the design year (2029).
- The proposed retail floorspace is not expected to have a significant impact on existing shopping patterns since it is proposed to address an identified local need for neighbourhood shopping facilities in Cherry Orchard and Park West as highlighted in local planning policy.
- This is supported by the analysis presented in Section 5.8 of this report which demonstrates that the proposed development will be largely self-contained; the new population generated by the development as a whole (Phases 1, 2 & 3) will generate an equivalent of 79% of the turnover of the proposed retail floorspace.
- The analysis presented in Section 5.8 of this report demonstrates that the scale and format of the proposed retail development is consistent with Cherry Orchard's identification in the DCDP as a Neighbourhood Centre in the retail hierarchy.
- Drawing together these findings we conclude that the proposed development would not have a significant adverse retail impact on any existing centre within the Study Area.

Having regard to the above, it is submitted that the proposed development is in line with all relevant policies with regards to retail impact. Furthermore, the proposed development will provide substantial benefits to the local area by addressing an identified local need for additional convenience retail facilities, improving consumer choice and supporting economic activity by attracting new services and businesses to locate in Cherry Orchard.

In conclusion, this report finds that the proposed development will not have a significant adverse retail impact on any existing centre and will address an identified retail need in the local area. As such, the proposed development should be considered acceptable with regards to retail impact.